

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

**Pre-submission  
Publication  
Document**

October 2018



**Wyre Forest**  
District Council



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### Wyre Forest District Local Plan Pre-Submission Publication – Foreword

Welcome to the Wyre Forest District Council consultation on the Pre-Submission Publication as part of the Review of the Local Plan. The Council is planning an Autumn/Winter of consultation on its Local Plan which includes proposals to accommodate its housing and employment needs up to 2036. This Local Plan Pre-Submission Publication Consultation is part of the process the Council has to follow to eventually adopt a new Local Plan to replace the current one which was adopted in 2013. The process of reviewing the Local Plan began in 2015 when the Council consulted on the broad Issues and Options, and was followed by the Preferred Options consultation held in 2017. The Council hopes the process will be complete when the Local Plan is adopted in 2020. The Local Plan that is finally adopted will have to respect the guidance provided to Local Authorities by Government's National Planning Policy Framework which requires Councils to plan positively for a period of at least 15 years for development in its area and particularly to meet the objectively assessed need for market and affordable housing.

Wyre Forest District Council believes that to have an up-to-date adopted Local Plan is essential in order to successfully plan for development to go where we want it and to enable the Council to make good decisions on planning applications.

The Council welcomes responses to this consultation which will run from 1st November 2018 until 5pm on 17th December 2018. This consultation is different from previous consultations as all comments submitted to us during this consultation will go to the government appointed planning inspector. The planning inspector will only consider two questions about the plan; whether the plan is within the law, and whether it can be considered 'sound'. Any comments received must address these issues.

We will be undertaking consultation drop-in sessions across the district throughout November and inviting people to respond. We need to work together to successfully adopt a new Local Plan and we need your help to do that. We therefore encourage you to let us have your views on this Local Plan Pre-Submission Publication.



A handwritten signature in black ink that reads "M. J. Hart".

**Councillor Marcus Hart**  
Leader of the Council



A handwritten signature in black ink that reads "I. J. Hardiman".

**Councillor Ian Hardiman**  
Deputy Leader and Cabinet Member for  
Planning and Economic Regeneration

## Introduction

**1.1** This document is Wyre Forest District Council's Local Plan Pre-Submission Publication. In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 it has been published to allow representations to be made before the document is submitted to the Planning Inspectorate. Consultation on the Local Plan Pre-Submission Publication will run from 1st November 2018 to 17th December 2018. All representations received will be submitted with the Local Plan to the Secretary of State for examination in public.

**1.2** Wyre Forest District Council (WFDC) is the local planning authority responsible for producing the Local Plan; town and parish councils can produce neighbourhood plans, and Worcestershire County Council is responsible for producing the minerals and waste local plans and also the Local Transport Plan. Together these plans make up the Development Plan, which sets out where development can take place, or where it should be avoided, and what form and type of development should take place.

### What is the Local Plan Review?

**1.3** This document is the latest stage in the preparation of the Wyre Forest Local Plan Review which sets out the long-term vision and strategic context for managing and accommodating growth within the District until 2036. The aim of the Local Plan is to set out:

- the areas where development will take place;
- the areas that will be protected; and
- policies that will be used to determine planning applications.

**1.4** Under the planning system most development needs planning permission. The principal basis for making those decisions is the development plan; this emerging Local Plan once adopted will form the main part of it for Wyre Forest District, replacing the currently adopted Local Plan.

### How has the Local Plan Review been prepared?

**1.5** The key stages for preparing the Local Plan have included gathering evidence, identifying key issues and options and public consultation. The Council has consulted extensively on the development of the Local Plan. Key public consultations are listed below:

- Issues and Options consultation - Autumn 2015
- Preferred Options consultation - Summer 2017
- Pre-Submission Publication consultation - currently being undertaken (2018)

**1.6** The Council received more than 1,600 responses to the Issues and Options public consultation, and over 5,000 responses to the Preferred Options public consultation, many of which were very detailed. Summaries of the consultation responses and key issues raised are available on the Council's website. In addition, a number of 'Call for Sites' has been undertaken

during which landowners were able to submit their sites for consideration. Various meetings have been held throughout the process including meetings with Worcestershire County Council, meetings with Statutory Consultees such as Historic England and Natural England, ongoing discussions with service and infrastructure providers and other local authorities and key bodies. Wherever possible, responses have been taken into account in the preparation of this emerging Local Plan.

## National Planning Policy

**1.7** The content of the Wyre Forest emerging Local Plan has to be in conformity to the Government's national planning policy as set out in the National Planning Policy Framework (NPPF), and the guidance contained in the National Planning Practice Guidance, the content of new relevant legislation and Government statements about planning. Whilst preparing this Pre-Submission Publication, the Government published its draft revised NPPF in March 2018 with the final version being published on 24th July 2018.

## Background and Context

**1.8** The current adopted Local Plan has served the District well. It has effectively directed development in a sustainable pattern and has brought forward sufficient land to meet the District's needs whilst at the same time protecting the District from speculative greenfield development. It has supported and encouraged the significant enhancement of the District during its lifetime.

**1.9** It has however been necessary to undertake a review of the Local Plan, as the Council has a legal obligation to have an up-to-date Local Plan. This process commenced in September 2015 with the "Issues and Options" consultation which explained that it is necessary to review the current plan for a number of key reasons:

- To consider the amount of development that will be required in response to the most recent official data (including population trends, demand for housing, economic trends) and locally generated evidence.
- To respond to recent changes in legislation (including the Housing and Planning Act 2016) and national planning policy as reflected in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).
- To respond to the Government's demand that Local Planning Authorities should have a Local Plan that is regularly reviewed and evidence-based to enable them to respond strategically to changing development needs over at least a 15 year period.

**1.10** It is important to note that the proposed Local Plan as set out by this Pre-Submission Publication document is a complete Plan and would be intended to replace all of the currently adopted Core Strategy (2010), Site Allocations and Policies Local Plan (2013), and the Kidderminster Central Area Action Plan (2013). As such the coverage of the new Local Plan will be:

- The **strategic element and policies** (Part A) as generally currently set out in the adopted Core Strategy;

- The **development management policies** (Part B) as generally currently set out by the adopted Site Allocations and Policies DPD;
- The **allocations policies** (Part C) as generally currently set out in the adopted "Site Allocations and Policies" and "Kidderminster Central Area Action Plan" DPDs;
- The proposed approach to **monitoring and implementation** (Part D).

**1.11** This will assist the reader by placing all aspects of the Local Plan into a single document and will remove the repetition which is unavoidable in the current documentation.

### Influences on the development of the Plan

**1.12** National planning policy includes the National Planning Policy Framework (NPPF). The NPPF sets out a number of fundamental issues that need to be taken into account during the preparation of local plans, which include the following requirements:

- To set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth.
- To use a robust and up-to-date evidence base to ensure that the local plan meets the objectively assessed needs for the market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF, including identifying key sites that are critical to the delivery of the housing strategy over the plan period.
- To set criteria, or identify strategic sites, that will help to encourage local and inward investment to match the strategy and meet anticipated needs over the plan period.
- To maintain a five-year supply of deliverable housing sites with an appropriate buffer.
- To recognise a duty to co-operate between public bodies and to implement a new soundness test, to ensure that plans are "positively prepared."

**1.13** Wyre Forest District is unusual in that it currently constitutes a self contained Housing Market Area whilst at the same time it is a member of two Local Enterprise Partnerships (LEPs) - namely Greater Birmingham and Solihull LEP and Worcestershire LEP. This provides Wyre Forest with a range of opportunities to further enhance its economic position, access funding streams and ensure that the area is able to continue to look both towards the rest of Worcestershire and the conurbation in the same way that it has done for many years. It also brings a range of challenges in terms of ensuring that development is balanced, is proportionate to the capacity of the District and does not undermine the unique character of the area.

**1.14** In 2013 leaders from Worcestershire's business, voluntary, community and public sector organisations pledged to work together to create a better future for Worcestershire. Expressed via "Worcestershire Next Generation" <sup>(1)</sup> this provides an update to the Sustainable Community Strategy.

## The Duty to Co-operate

**1.15** The Duty to Co-operate was introduced through the Localism Act 2011 and places a requirement on Local Planning Authorities (as well as a number of other public bodies) to work together on cross-boundary strategic issues. Local Planning Authorities and other public bodies are required to engage constructively, actively and on an on-going basis to develop strategic policies. This requirement is also established in national planning policy (NPPF, paragraphs 24 to 27).

**1.16** The NPPF introduces a new 'soundness' requirement to be met through the compliance with the Duty to Co-operate. Plans are to be positively prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. Joint working should be diligently undertaken for the mutual benefit of neighbouring authorities and enable Local Planning Authorities to work together to meet development requirements which cannot wholly be met within their own areas. Local Planning Authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross boundary impacts when their Local Plans are submitted for examination. Co-operation should be a continuous process of engagement.

**1.17** As part of its plan making process, Wyre Forest District Council has consulted and engaged with relevant Local Planning Authorities and other public bodies on emerging policies at key stages. The Duty to Co-operate formalises this process and places an emphasis on continuity.

**1.18** Wyre Forest District Council is fully committed to continuing to work positively and proactively with other local authorities and public bodies to address strategic issues in the longer term, particularly with regards to addressing opportunities to meet unmet housing needs. Where necessary, Statements of Common Ground will be prepared for the purposes of the examination stage (in accordance with NPPF).

## Evidence

**1.19** In order to ensure that the Local Plan's policies are robust and supported by evidence, the Council has carried out and commissioned a wide range of studies. Work undertaken includes the following and can be viewed on the Council's Planning Policy webpages:

- Objectively Assessed Housing Needs (now the Housing Needs Study)
- Employment Land Review
- Green Belt Study

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1 <http://www.wearethenextgeneration.co.uk>

- Strategic Flood Risk Assessment
- Water Cycle Study
- Heritage Impact Assessment
- Ecological Appraisals
- Open Space, Built Facilities and Playing Pitch Strategies
- A revised settlement hierarchy
- Retail and Commercial Leisure Needs Survey
- Traffic Modelling
- Infrastructure Delivery Plan
- Viability Assessment

**1.20** A Sustainability Appraisal report is also required under European and government legislation, which has to assess the sustainability implications of the proposals and policies in the emerging Local Plan. A Sustainability Appraisal report has therefore been prepared to accompany the Local Plan.

### **Using this Local Plan Pre-Submission Publication Document**

**1.21** This Local Plan Pre-Submission Publication has been written with the intention that it should be read as a whole. Taken together, the policies and proposals within the Local Plan Pre-Submission Publication will form a coherent strategy for development in the Wyre Forest Plan area up to 2036 (Local Plan period is 2016 to 2036). It is therefore important that individual policies are not considered in isolation. (Note that the plan period has been extended by 2 years to that which was consulted on at Preferred Options stage. This is so the Local Plan will be in conformity with the NPPF, with a 15 year time period post adoption which is anticipated to be in 2020).

**1.22** The policies in the emerging Local Plan will only apply where planning permission is required and not where permitted development rights exist as set out in the Town and Country Planning (General Permitted Development) (England) Order 2015.

**1.23** This document is accompanied by a Policies Map which shows the area specific policies and proposals on an Ordnance Survey base map. The Policies Map identifies areas to be allocated for development and designations which need to be taken into account in applying policies. The Local Plan Policies Map does not replicate proposals and designations from the 'made' neighbourhood plans and their maps will need to be consulted separately.

## How to Comment on the Local Plan Pre-Submission Publication document

**1.24** The seven week consultation on the Local Plan Pre-Submission Publication will start on Thursday 1st November 2018 and will close promptly at 5:00pm Monday 17th December 2018. **No late responses will be accepted.**

**1.25** The consultation response form follows the same structure as the standard response form issued by the Planning Inspectorate. This is so that consultation responses are set out in the way the Planning Inspector will consider comments at the public examination. The consultation response form is available to complete on the Council's website: [www.wyreforestdc.gov.uk/localplanreview](http://www.wyreforestdc.gov.uk/localplanreview) **We will only accept responses submitted using the consultation response form.**

**1.26** The Council strongly encourages responses to be submitted using the on-line response form via the District Council's interactive consultation system. Consultation responses will only be accepted if submitted in one of the following ways:

- Via the On-line portal
- by downloading the form from our website: [www.wyreforestdc.gov.uk/localplanreview](http://www.wyreforestdc.gov.uk/localplanreview)
- collecting a hard copy from main reception at Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF, or from the Customer Service Centre (The Hub), Town Hall, Vicar Street, Kidderminster, DY10 1DB.
- forms should be emailed to: [LPR@wyreforestdc.gov.uk](mailto:LPR@wyreforestdc.gov.uk) or posted back to Planning Policy Team, Wyre Forest DC, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF.

**1.27** *Please note that representations made at this stage in the process cannot remain anonymous, but details will only be used in relation to the Wyre Forest District Local Plan Review. Your response will be made available to view as part of the Examination process.*

**1.28** The Planning Policy Team will host a number of drop-in sessions during the consultation period where you can come along and speak to us about the Local Plan Pre-Submission Publication and how it might affect you. These sessions will be as follows:

**Table 1.0.1**

Date	Time	Venue
Friday 16th November 2018	3pm - 7pm	Cookley Village Hall
Saturday 17th November 2018	10am - 2pm	Offmore Evangelical Church Hall, Kidderminster
Tuesday 20th November 2018	5:30pm - 8pm	Heronswood Primary School, Spennells, Kidderminster
Friday 23rd November 2018	3pm - 7pm	Areley Kings Village Hall

Date	Time	Venue
Saturday 24th November 2018	10am - 2pm	Stourport Civic Hall
Tuesday 27th November 2018	3pm - 7pm	St Georges Hall, Bewdley
Thursday 29th November 2018	3pm - 7pm	Kidderminster Town Hall
Friday 30th November 2018	3pm - 7pm	St Oswalds Church Centre, Broadwaters Drive, Kidderminster

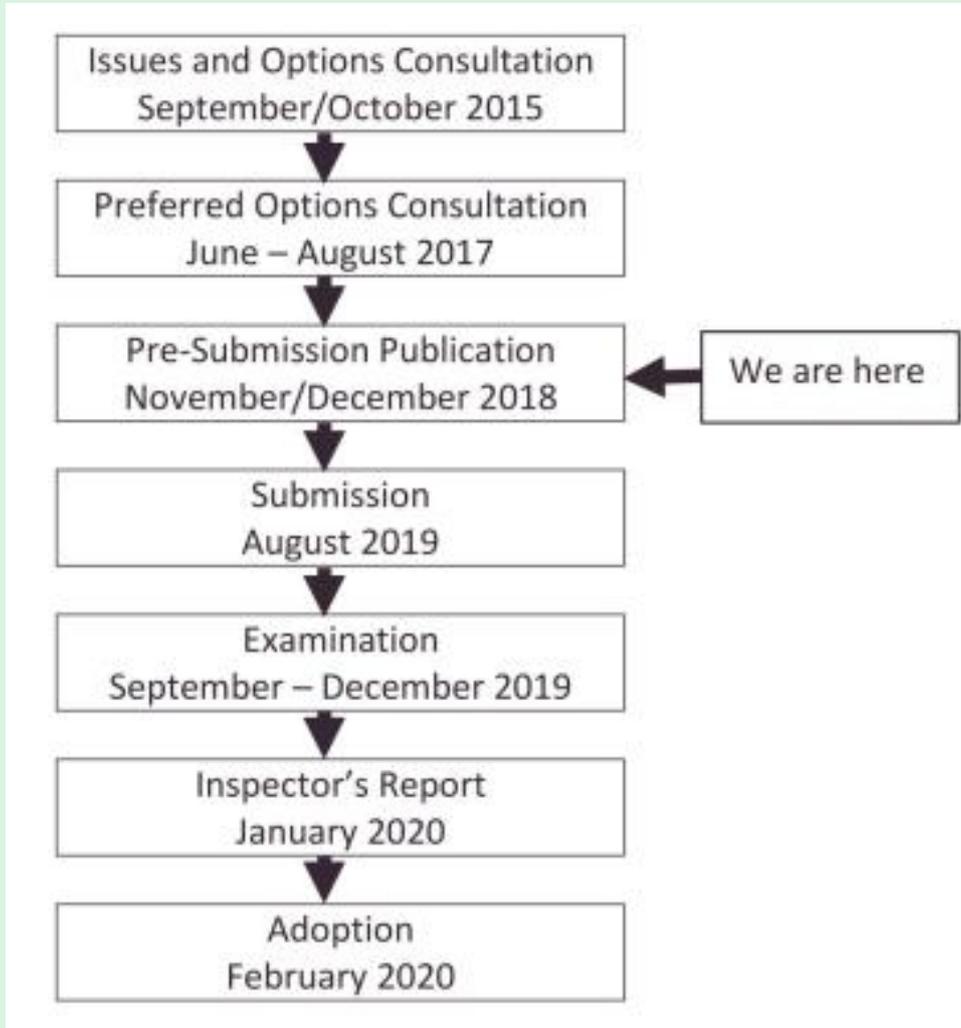
## The Next Stages

**1.29** After the Local Plan Pre-Submission Publication consultation period ends, we will consider all of the consultation responses received during the consultation period and may, as a result, update the Submission version of the Local Plan. The Submission version will be approved by a meeting of the full Council which is expected to happen in July 2019. We will then submit the Submission version of the Local Plan for examination by an independent Government appointed Planning Inspector. Consultation responses received for this Local Plan Pre-Submission Publication document and the updated evidence base studies will be passed to the Planning Inspector.

**1.30** The Council anticipates that an examination in public will be held on the plan in late 2019 with adoption of the Local Plan taking place in 2020. **However, the timetable after submission is beyond the Council's control and will be in the hands of the Government appointed Planning Inspector.**

Key stages of the Wyre Forest District Local Plan Review

Picture 1.1



## Wyre Forest today – a pen picture

**2.1** This section paints a picture of Wyre Forest District and provides a snapshot of its key features. It also summarises the key issues facing the District. These include continuing to make the most of brownfield regeneration, ensuring that we have thriving communities with suitable jobs and homes and ensuring that the natural environment is enhanced, used and enjoyed by all. The narrative below reflects the feedback provided via the Preferred Options consultation which ran from 15<sup>th</sup> June to 14<sup>th</sup> August 2017 and the “Issues and Options” consultation which ran from 1st September to 16th October 2015.

### The Settlement Hierarchy

**2.2** Wyre Forest District is named after one of the largest ancient semi-natural woodlands in the country and is situated in north-west Worcestershire. The local authority area covers 75 sq.miles and has an estimated population of around 100,600 people in 2018<sup>(2)</sup>.

**2.3** The population increased by 1.1% (2001-2011), by a further 1.1% from 2013 to 2015 and again by a further 1.1% 2015 to 2017. The rate of growth in Wyre Forest District is below that of Worcestershire which is 6.7%, the West Midlands 8.9%, or England 10.8% (Amion 2017). The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036. This means that the population is likely to rise to 105,300 in 2036<sup>(3)</sup>. The District has an ageing population and therefore there will be a higher number and percentage of older residents. The population aged 65 years and over is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036<sup>(4)</sup>.

**2.4** The District is largely rural, and has three towns: Kidderminster, Stourport-on-Severn and Bewdley. The three towns form a triangle of settlements at the centre of the District; between each of the towns is a narrow area of countryside. Each of the towns has its own character and community identity.

**2.5** Kidderminster (pop.56,538 in 2016), is the largest of the three towns and is the main centre for retail, industry and housing. The town developed rapidly in the 19th Century as a world leading centre for the production of carpet. This manufacturing industry has been in decline since the 1970s.

**2.6** Stourport-on-Severn (pop.20,542 in 2016), developed as an important industrial Georgian Canal Town at the confluence of the River Severn and River Stour with the construction of the Staffordshire and Worcestershire Canal. For over 100 years this attractive town with its riverside meadows has been a popular day trip destination for residents from Birmingham and the Black Country.

**2.7** Bewdley has a population of approximately 9,000 (including the surrounding rural area the population is approximately 13,802) and is a Georgian riverside town, an inland port with surviving wharves which saw significant development during the 1960s. Today Bewdley is an attractive historic market town and a popular visitor destination.

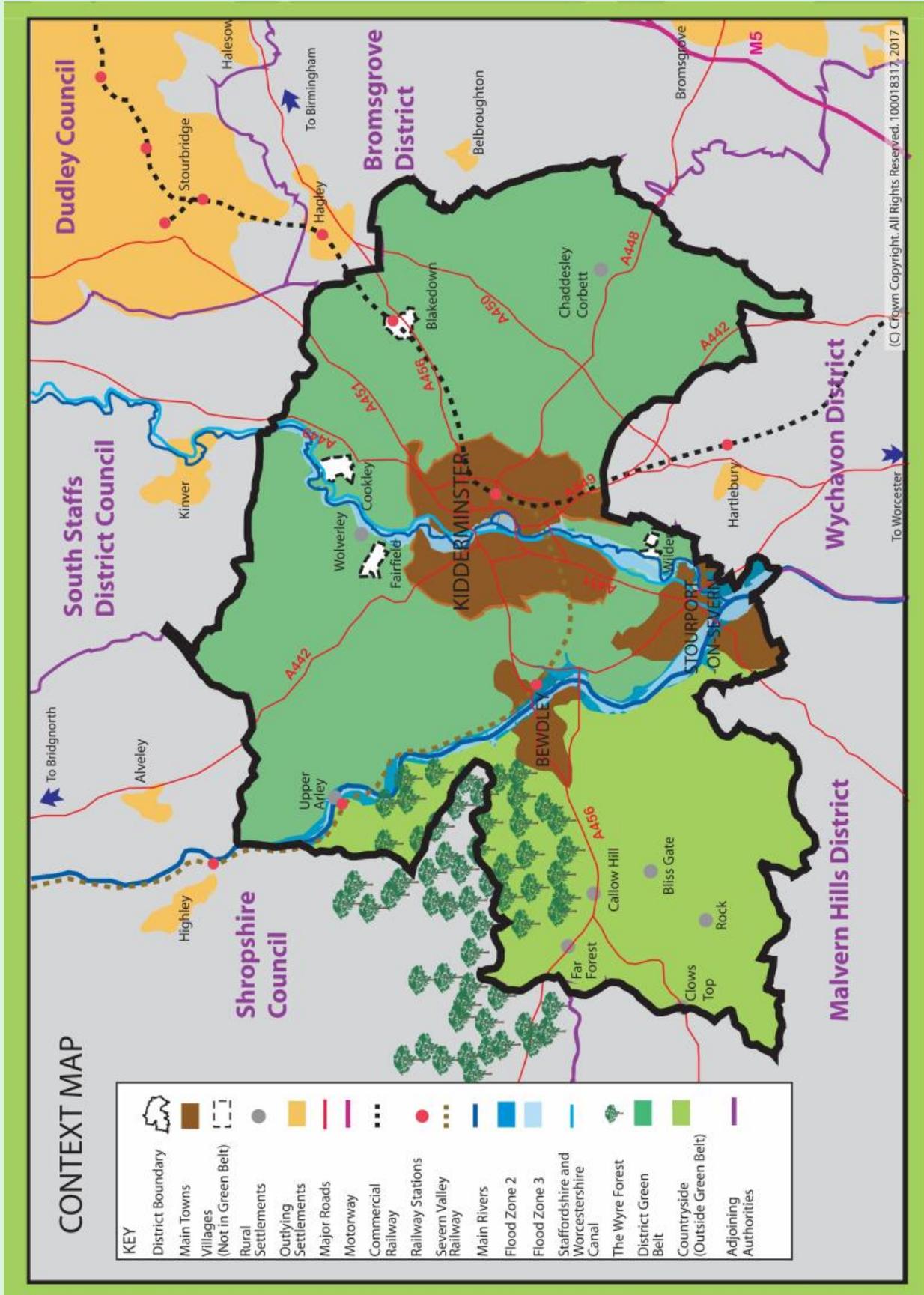
2 ONS 2016 Subnational Population Projections

3 ONS 2016 Subnational Population Projections

4 ONS 2016 Subnational Population Projections

**2.8** To the east, the larger more accessible villages include Blakedown and Cookley which are served by both facilities and public transport, Blakedown having a railway station. Villages in the west, which include Rock and Far Forest, are smaller with fewer facilities and more limited public transport.

Context Map



### Issues facing Wyre Forest

**2.9** The Preferred Options consultation conducted in June – August 2017 together with the Issues and Options consultation conducted in September - October 2015, considered a range of challenges that face the Wyre Forest District area. The consultations provided valuable feedback to the development of the Pre-Submission document which has helped to steer the strategy's development.

**2.10** The issues set out in Table 2.0.1 were proposed by the Issues and Options paper and are divided into three categories: social; economic; and environmental.

**Table 2.0.1 Issues highlighted in Preferred Options and Issues and Options Consultation documents**

#### **Social issues for Wyre Forest District:**

- Ageing population. Low percentage of residents in the 0-19 and 20-39 age groups. High proportion of residents aged 45-64; very high proportion of residents aged 65+.
- The ageing population means that more care facilities are needed for elderly/end of life as well as specialist accommodation.
- The elderly may want to downsize to smaller residential units which could free up family sized accommodation. Need to ensure that residential development caters for all groups in society.
- There are high obesity levels.
- The District has a low level of in-migration.
- Whilst the population has increased, the number of households has increased at a greater rate as the quantity of residents per unit of accommodation is falling.
- Housing affordability problems.
  
- Need to ensure that residential development caters for all groups in society.
- Fuel poverty.
- Noticeable variations in health between those living in the most affluent wards and those living in the most deprived wards in the District.
- High costs of providing healthcare for an ageing population with high obesity which results in more medical intervention; for example, hospital stays or visits to GPs.
- Low availability of services in the District's rural areas.
- Leisure and sport facilities should be accessible to local residents. Participation in swimming and attending the gym are highest within the District with over 10% of the public accessing these activities.

#### **Economic issues for Wyre Forest District:**

- Reduction in traditional manufacturing industries – need for employment opportunities and suitable housing. Working age people need to be attracted to the District as economically active people improve the area. This helps retail and regenerates the area; more people spending money encourages more shops; this in turn improves the town centre so that more retailers wish to open shops, restaurants and provide services.
- The ratio of economically dependent people to economically active people is high. Therefore, we need to attract more economically active people to the District to ensure that communities are better balanced.

- Generally low unemployment within the District; however, there are pockets of higher unemployment in Foley Park and Hoobrook ward and Broadwaters ward.
- Lower earnings, both by location of employment and by residence than the West Midlands or Great Britain. It is likely that many people are commuting to Worcester or Birmingham for higher paid jobs. About 40% of residents commute to outside the district for work. Need to raise wage levels by attracting employers with higher wages, thus reducing the wages gap between the district and neighbouring local authority areas, and reducing commuting.
- Development of brownfield sites - current Government policy states that 90% of suitable brownfield sites should have a Local Development Order for residential development by 2020. This could potentially push industrial development into other areas such as the Green Belt. Diversify the economy, create more skilled jobs to reduce out of District commuting and increase the retention of young educated residents.
- Need to deliver infrastructure to support housing and employment development.
- Improve rates of qualification at both GCSE level and higher and further education.
- Greater diversity of shops as improvements are made to Kidderminster shopping centre to encourage more visitors to the town centres and to tourist attractions throughout Wyre Forest District.
- Need to regenerate the town centres, areas of the town centre which have been traditionally retail could change to other uses and the primary shopping area could be redefined.

#### **Environmental issues for Wyre Forest District:**

- Pressure for development in the Green Belt as over half of the District falls within the West Midlands Green Belt.
- Pressure for development in flood zones.
- Safeguarding the best and most versatile agricultural land.
- Improving air quality and water quality.
- Ensuring that new development reflects Wyre Forest District's distinctive character.
- Protecting, conserving and, where it is possible to do so, enhancing the District's rich natural environment and historic assets.
- Planning for the impact of climate change, which includes flooding, in new development.
- Poor air quality (AQMA) at Horsefair, Kidderminster and Welch Gate, Bewdley.

**2.11** These issues from the Preferred Options consultation and the Issues and Options consultation were broadly supported by respondents with a range of specific comments being made which primarily related to:

- Very poor public transport and high levels of traffic congestion with poor strategic transport infrastructure. It was strongly felt by consultees that these issues need to be addressed to encourage further investment in the District.

- Concern felt that the proposed Eastern Relief Road would not solve the problem of congestion in Kidderminster.
- Concern that infrastructure i.e GP surgeries and schools are at capacity and more dwellings would mean more population that would add to the problem.
- Concern raised regarding the number of dwellings required and amount of employment land required as many considered the amount required is too high.
- Many residents concerned that development of dwellings or employment may take place in the Green Belt.
- Many residents wanted brownfield sites to be developed before greenfield or Green Belt sites.
- Many local residents raised the importance of protecting the Green Belt and concerns over increased recreational pressures on the countryside.
- A number of comments were received regarding the future role of the Severn Valley Railway and the part it could play in improving passenger transport.
- A number of landowners and others involved in the development industry registered their concern that the relationship between the Green Belt, brownfield land availability, housing completions and employment opportunities had not been addressed.
- Many residents commented that Kidderminster town centre needs regeneration and a range of uses introduced into the centre including residential.

**2.12** These additional issues from both the Preferred Options consultation and the Issues and Options consultation have been considered within the development of this Local Plan Pre-Submission Publication document together with evidence from the evidence base studies.

**3.1** In the same way that the issues facing Wyre Forest District were previously consulted on so were the Vision and Objectives for the District. Again there was general support for these although with some suggested changes. Table 3.0.1 below presents the proposed amended Vision and Objectives.

**Table 3.0.1 What will Wyre Forest District be like in 2036?**

<ol style="list-style-type: none"> <li>1. In 2036 the three main towns of Kidderminster, Stourport-on-Severn and Bewdley in Wyre Forest District continue to maintain their distinctive and separate identities. The outlying villages have grown organically to meet their own needs. The Rivers Severn and Stour and the Staffordshire and Worcestershire Canal together with other green infrastructure are valued links for both wildlife and residents within and between the town centres, the surrounding countryside and villages.</li> <li>2. The District’s varied natural habitats, together with its diverse and historic landscapes are thriving, and offer a range of outdoor interests, contributing to local educational opportunities and sustainable tourism. Residents and businesses rely increasingly on energy from locally generated renewable sources. Water management forms an integral part of the planning and design of developments. This includes the mitigation of flood risk, water efficiency and widely used SuDS.</li> <li>3. Kidderminster has benefited from sustainable brownfield regeneration. The attractive and accessible town centre provides a range of retail and commercial leisure opportunities as well as civic spaces and urban greenspace. Kidderminster supports a vibrant visitor economy and a flourishing evening economy. Through its links with the region’s Universities and Colleges, Kidderminster provides an important educational and vocational training centre. The transformation of the town has been enhanced by an improved transport infrastructure through which traffic congestion in the town centre has been considerably reduced with an associated improvement in air quality and opportunity for regeneration.</li> <li>4. Stourport-on-Severn offers a range of facilities to local residents and visitors alike and its canal and riverside remain a key visitor attraction. Its public realm is enhanced through the restoration of its unique heritage including the canal basins and the regeneration of Bridge Street.</li> <li>5. Bewdley remains a thriving market town which meets the local community’s needs. The town’s historic character is preserved and its flourishing riverside environment continues to attract visitors.</li> <li>6. To the east of the District, the larger villages of Cookley and Blakedown continue to provide local residents and the surrounding rural hinterlands with key local services. There remain more limited services, focussing on the needs of local communities, in settlements to the west such as Rock, Clows Top and Far Forest.</li> <li>7. The District's housing market provides a choice of accommodation responding well to local needs and catering for single households, families and the elderly in particular. Job creation is balanced with housing delivery, encouraging younger people to remain within and be attracted to the District to create a better balanced population structure.</li> <li>8. A vibrant and sustainable economy exists, primarily focussed around Kidderminster, Stourport-on-Severn and the Stourport Road Employment Corridor providing a range of jobs across the service, retail, research and development and manufacturing sectors, with the infrastructure and a skilled population in place to support it. The urban areas of Kidderminster and Stourport-on-Severn and the South Kidderminster Enterprise Park are the main focus for employment but they are supported by the rural economy including several existing and significant industrial estates where sustainable growth will have occurred, and sustainable tourism.</li> <li>9. The three towns and rural areas are well served by a sustainable transport network that delivers high levels of accessibility to key services and attractions by a variety of modes of transport. The urban environments have experienced reduced levels of traffic congestion and improved air quality within the town centres which has encouraged the renaissance of Kidderminster town centre. Kidderminster Railway Station acts as a high quality gateway to the District providing convenient interchange for pedestrians and cyclists alike. Frequent rail links to the nearby regional centre of Birmingham and the sub-regional centre of Worcester give access to higher order services. There will also be traffic calming measures in place around schools that are properly enforced.</li> </ol>
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10. Crime and disorder in the District remain low and local residents feel safer. Residents have the opportunity to lead healthier lifestyles with improved access to clean and attractive green spaces, facilitated by a comprehensive network of routes suitable for vulnerable users (e.g. walkers, cyclists, horse riders). Young residents can access a variety of activities and facilities in the three towns and can make better use of community facilities in the rural villages. Educational achievement rates have improved, particularly in the wards of Oldington & Foley Park and Broadwaters.<sup>(5)</sup> Local residents are more skilled through improved access to training opportunities within the community. As they get older, residents' good health and wellbeing continues through easy access to quality health care and community facilities.
11. New development in Wyre Forest is properly supported by the timely provision of suitable infrastructure.
12. Lea Castle Village will be a new sustainable village with enough housing to generate a new village centre with its own local shop, primary school, employment uses and new and upgraded sports pitches. It will be set within an extensive woodland/landscape setting.
13. The Kidderminster Eastern Extension will be a well-designed residential development offering a choice of high quality new homes to meet local needs set within an extensive area of green space which is readily accessible to everyone in the area.

#### Development Plan Aim and Objectives

**3.2** The following plan objectives (Table 3.0.2) will help address the key challenges facing Wyre Forest District and will contribute to the achievement of the Vision expressed above.

**Table 3.0.2 Wyre Forest Development Plan – Aim and Objectives**

##### Plan Aim

By 2036 Wyre Forest will be a District where people want to live *and* work *and* fulfil their potential without the need for excessive travel.

##### Plan Objectives

1. To encourage the long term sustainable development of Wyre Forest and its communities.
2. To address the key challenges facing the District especially in terms of housing, employment, health and transport.
3. To address housing needs in order that existing and future residents' requirements are met and the economic development of the area is supported.
4. To recognise the changing nature of employment, encourage economic diversification and make sufficient high quality employment sites available.
5. To maximise the use of previously developed land in order to ensure the best use is made of available land both within and beyond the main towns.
6. To protect and support the role of the Green Belt through a strategic review and to identify limited 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.
7. To maximise opportunities for the inclusion of green infrastructure into high quality development in order to provide a good quality of life and maximise the benefits of walking and cycling. Safeguard and enhance the District's biodiversity and geodiversity assets.
8. To promote the historic environment and landscape and conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.
9. To increase provision and to facilitate greater access to sport, recreational and other community facilities in order to encourage healthier lifestyles and improve the health and wellbeing of the District's population.

<sup>5</sup> Pre May 2015 Wards are referred to as data is not yet available for new Wards.

10. To improve connectivity within the District and achieve more sustainable travel patterns and reduce the need to use the private car through improved public transport services (bus and rail), and new and enhanced cycleways and footpaths. These actions will contribute to an improvement in air quality.
11. To protect the District's water supply and quality, and reduce the risk of flooding.

## Document Structure

**3.3** To address this range of challenges and issues within the space of a single document is both challenging and complex. In order to achieve this, the document is ordered according to the following structure:

**Table 3.0.3**

Part	Description	Associated Policies	
		Section	Policy Title
A	Strategic Policies	5	Overarching Sustainable Development Principles
		6	A Sustainable Future – Development Strategy
		7	Strategic Green Belt Review
		8	A Desirable Place to Live
		9	Health
		10	A Good Place to Do Business
		11	A Unique Place
		12	Strategic Infrastructure
		13	Transport and Accessibility
		14	Strategic Green Infrastructure
		15	Water Management
		16	Pollution, Minerals and Waste
	Key Diagram		
B	Development Management Policies	18	A Desirable Place to Live
		19	Providing Accommodation for Gypsies, Travellers and Travelling Showpeople
		20	Community Facilities
		21	Employment Land
		22	Retail
		23	Sustainable Tourism
		24	Telecommunications and Renewable Energy
		25	Safeguarding the Green Belt
		26	Safeguarding the Historic Environment

Part	Description	Associated Policies	
		Section	Policy Title
		27	Quality Design and Local Distinctiveness
		28	Rural Development
C	Proposed Allocations	30	Kidderminster Town
		31	Lea Castle Village
		32	Kidderminster Eastern Extension
		33	Stourport-on-Severn
		34	Bewdley
		35	Previously Developed Sites in the Green Belt
		36	Rural Wyre Forest
D	Monitoring and Implementation Framework	37	Monitoring and Implementation Framework

Wyre Forest District Council is satisfied that this Local Plan has been designed to achieve sustainable economic growth throughout the plan period, in accordance with the requirements of the NPPF. It has identified and promoted a range of sites suitable for housing, employment-generating activity, mixed-use, commercial and retail growth and appropriate rural diversification and enterprise activities.

**4.1** The remainder of Part A of this Plan sets out the primacy of the need for sustainable, positively planned development required to meet the needs of Wyre Forest District throughout this plan period (2016 - 2036). In doing so it describes the Development Strategy necessary to address the identified issues and challenges and to guide development to ensure that it is appropriate in scale and balanced.

**4.2** In setting out the Development Strategy this section proposes a range of Strategic Policies intended to provide the context and necessary framework for the subsequent Development Management and Site Allocations policies (Sections B and C respectively) of this document. This Section's policies consider:

- **Section 5 Overarching Sustainable Development Principles**
- **Section 6 A Sustainable Future – Wyre Forest Development Strategy**
- **Section 7 Strategic Green Belt Review**
- **Section 8 A Desirable Place to Live**
- **Section 9 Health**
- **Section 10 A Good Place to do Business**
- **Section 11 A Unique Place**
- **Section 12 Strategic Infrastructure**
- **Section 13 Transport and Accessibility**
- **Section 14 Strategic Green Infrastructure**
- **Section 15 Water Management**
- **Section 16 Pollution, Minerals and Waste**
- **Key Diagram**

**5.1** The purpose of the planning system is to contribute to the achievement of sustainable development. The Government defined sustainable development via the National Planning Policy Framework (NPPF) which, when taken as a whole constitutes their view of what this means in practice for the planning system in England.

**5.2** Government's overall requirement is summarised at NPPF paragraph 11 which considers that plans and decisions should apply a presumption in favour of sustainable development. As with the Government's view that the meaning of sustainable development is expressed by the entirety of the NPPF, Wyre Forest District Council considers that the meaning of sustainable development for its area is embodied by the whole of this document and the policies it contains.

**5.3** The following policy integrates the presumption in favour of sustainable development into the Wyre Forest District Local Plan. It should be noted that this policy does not affect or remove statutory consultation on planning applications.

### **Summary of Preferred Options Responses**

General support that Policy 5A broadly reflects national guidance and is consistent with the presumption in favour of sustainable development that is at the heart of the National Planning Policy Framework (NPPF).

### **Summary of Issues and Options Responses**

General support for the concept of sustainable development and the need to maximise the benefit of existing and future supporting and strategic infrastructure.

### **Policy 5A - Sustainable Development**

- A. When considering development proposals, Wyre Forest District Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). The Council will always work jointly and proactively with applicants in a positive and creative way which mean that proposals can be approved wherever possible, and to secure development that improves economic, social and environmental conditions in the District.
- B. Planning applications that accord with the policies in the Development Plan (and where relevant, with polices in Neighbourhood Plans) will be approved unless material considerations indicate otherwise.
- C. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- i. the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

### Reasoned Justification

**5.4** The economic, social and environmental aspects that make up sustainable development need to be balanced carefully to accomplish a positive outcome. The NPPF makes it clear that the purpose of the planning system is to contribute to the achievement of sustainable development.

**5.5** In order to achieve a sustainable end result, the Plan (through its overall approach and policies) needs to perform a number of roles:

- a. **An economic role** – contributing to building a strong, responsive and competitive Wyre Forest economy by:
  - i. Ensuring that sufficient land of the right type is available in the right locations and at the right time to support economic and social growth and innovation.
  - ii. Identifying and co-ordinating development requirements, including the provision of infrastructure.
  - iii. Promoting accessibility to everyday facilities for all, especially those without a car or those seeking to achieve a modal shift away from the car.
  - iv. Implementing the Worcestershire LEP Strategic Economic Plan.
  - v. Implementing the Greater Birmingham and Solihull Strategic Economic Plan.
- b. **A social role** – supporting strong, vibrant and healthy communities in Wyre Forest by:
  - i. Ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.
  - ii. Fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

- iii. Creating a strong sense of place by strengthening the distinctive and cultural qualities of towns and villages.
  - iv. Creating safe and accessible environments where crime, disorder and the fear of crime do not undermine quality of life or community cohesion.
- c. **An environmental role** – contributing to protecting and enhancing Wyre Forest’s unique natural, built and historic environment by:
- i. Making effective use of land.
  - ii. Helping to improve biodiversity.
  - iii. Using natural resources prudently.
  - iv. Minimising waste and pollution.
  - v. Safeguarding and enhancing landscape character.
  - vi. Protecting significant historic buildings, monuments, sites of archaeological significance and the integrity of local planning designations.
  - vii. Protecting and enhancing green infrastructure.
  - viii. Mitigating and adapting to climate change and flood risk, including moving to a low carbon economy and reducing flood risk and wastewater through water management.

**5.6** These roles should be delivered through the application of the policies within the NPPF and the Development Plan.

**5.7** Economic growth can secure higher social and environmental standards and well-designed buildings and places can improve the lives of people and communities. For example, the promotion of local food production can help support and diversify the local agricultural economy, promote healthier lifestyles and provide valuable habitats or wildlife. Similarly, sustainable drainage can provide a cost-effective measure to reduce the environmental impact of surface water run-off and increase resilience to flooding. To achieve sustainable development, economic, social and environmental gains will be sought jointly and concurrently wherever possible.

**5.8** The Local Plan will seek to guide development to achieve sustainable solutions and the policies, taken as a whole, constitute the authority’s view of what sustainable development means in practice for Wyre Forest when promoted through the planning system.

**5.9** Development proposals will need to accord with the Development Plan, which comprises the adopted Local Plan, neighbourhood plans that have been made, the Waste Core Strategy, Minerals Local Plan, and the Local Transport Plan. Neighbourhood plans that have been

approved at referendum are also part of the Development Plan, unless the District Council decides that the neighbourhood plan should not be made. Any relevant adopted Supplementary Planning Documents should also be considered as part of the planning application process.

## Introduction

**6.1** The Development Strategy sets out the broad framework for future development within the District for the 2016-2036 time period. It takes forward the vision and development objectives into a strategy to address the issues and challenges facing the District and to guide development into the future. Importantly it also establishes a clear role for the District's settlements in accommodating future development.

### Summary of Preferred Options Responses

Some of the key issues raised during the Preferred Option consultation included the following:

- A number of respondents disagreed with the OAHN requirement of 300 dwellings per annum and thought the figure should be lower.
- Concerns over Green Belt release for future development. Loss of agricultural land and wildlife.
- The proposed Eastern Relief Road proved to be unpopular with criticism that this relief road would not be sufficient to alleviate the traffic problems in Kidderminster.
- Brownfield land should be built out first before releasing any Green Belt land.
- The Plan period should be extended beyond 2034 to be NPPF compliant, i.e. Local Plans should have a 15 year time horizon from adoption.
- Concerns that infrastructure will be insufficient to support new development, i.e. not enough school places, GP surgeries already fully stretched, and congestion on road network.
- Concern that there are insufficient jobs to sustain the number of extra people.
- In terms of the proposed options A and B, there was criticism of both options and a number of respondents considered a combination of the two options would provide both deliverable and sustainable growth for the district.

### Summary of Issues and Options Responses

The Issues and Options consultation was broadly supportive of the matters identified. Consultees' particular concerns related to:

- Very poor public transport and high levels of traffic congestion with poor strategic transport infrastructure. It was considered that these issues need to be addressed to encourage further investment in the District.
- The need to meet the District's housing and other requirements and that a pro-growth agenda should be pursued. This needs to look beyond just brownfield redevelopment and should address the relationship between the Green Belt, brownfield land availability, the deliverability of current Plan allocations, housing completions and employment opportunities.
- Other issues included the need to look at Green Infrastructure strategically, the potential to focus new development around strategic transport infrastructure and the progression of a strategic Green Belt Boundary Review.

- General support for the re-utilisation of brownfield land (Option 1) continues though there are concerns about the viability of some of these sites. Similarly support continues for the emphasis of concentrating development in and around the main settlements.
- Support for a sustainable urban extension to the north of Kidderminster based on the Lea Castle Hospital site (Option 2) and the Hurcott Lane ADR: although in respect of the latter concern was expressed in respect of traffic and impact on the SSSI.
- Local opposition from local residents (particularly the Spennells Housing Estate) in respect of an Eastern Kidderminster extension (Option 3) although some support for this approach was expressed from other quarters.
- Continuing widespread support for the brownfield regeneration of Stourport (Option 4) with some querying whether further greenfield development there is necessary.
- Concerns over the recent lack of development in Bewdley were expressed with the acknowledged need for some development to meet local requirements (Option 5). This may need a redrawing of the settlement boundary if the Air Quality Management Area problems are not worsened.
- Little enthusiasm was expressed for allocating development to the Rural East villages (Option 6). Where development takes place this should be proportionate.
- Due to its isolation and poor sustainability little enthusiasm was expressed for directing development to the Rural West (Option 7) though the requirement to meet local need is acknowledged.

### 6.2 The Development Strategy is made up of six policies which consider:

- the Development Needs – or amount of development - to be delivered within the Plan period (Policy 6A);
- the general location strategy for new development and Settlement Hierarchy (Policy 6B);
- the role of Kidderminster as the strategic centre (Policy 6C);
- the role of the Strategic Allocation Sites (Policy 6D);
- the role of Stourport-on-Severn and Bewdley as market towns (Policy 6E); and
- the role of the villages and other rural settlements (Policy 6F).

**6.3** The 'Key Diagram' supports the Development Strategy by showing the opportunities and constraints to guide new development and significant future infrastructure. The Key Diagram is the principal illustration of the spatial strategy. The diagram identifies broad locations for development, key areas of constraint, the main patterns of movement and also outlines the classification of settlements, reflecting the settlement hierarchy included within the Spatial Development Strategy. The Key Diagram can be viewed at end of Part A.

### **Policy 6A - Development Needs 2016 - 2036**

- A. During the Plan Period (2016-2036) Wyre Forest District Council will make provision for, monitor and manage the delivery of housing, employment land, retail and offices

at the levels of development contained in Table 6.0.1. This delivery will be in accordance with the site allocations set out in Part C of this document.

- B. As required by the Duty to Co-operate <sup>(6)</sup>, due consideration will be given, through a future review of the WFDC Local Plan where appropriate, to the housing needs of neighbouring local authorities in circumstances when it has been clearly established through the local plan process that these needs must be met through provision in the Wyre Forest District area.

**Table 6.0.1 Wyre Forest Development Needs 2016-2036**

Type of Development	Amount of Development Required	Annual requirement
Dwellings (net additional)	5,520	276
C2 use (Institutional / Care home bed spaces)	487 bed spaces	Not applicable
Employment Land	29 hectares	Not applicable
Comparison Retailing	Zero	Not applicable

**Reasoned Justification**

**6.4** Housing provision will be made for 5,520 dwellings (net) which includes market housing and affordable housing provision. A separate provision for 487 C2 (e.g. care homes / nursing homes bed spaces) will also be made. This level of housing is considered appropriate by Wyre Forest District Council in order to meet the challenges posed by the need for economic regeneration of the District and the provision of an improved level of affordable housing without undermining the local housing market. Key objectives of the Development Strategy include making provision for:

- a. The right amount of land and type of employment uses at readily accessible locations in which business will thrive and be resilient to current and future challenges;
- b. Sufficient housing provision that enables the labour force to live locally and contributes to achieving the right mix of housing types so that the wide range of housing needs can be met;
- c. Whilst the current quantum of available retail provision is considered to be broadly correct it will be necessary to ensure that the retail offer is appropriate to the future requirements of the District. Therefore, whilst it is not anticipated that there will be a need for any additional large scale provision, it may be appropriate for the offer to evolve in order to meet future requirements. Where additional requirements are anticipated to be required to support housing allocations these will be detailed by the specific site allocation policies in Part C of this document.
- d. Infrastructure that supports communities which are housing the labour force and facilitates the movement of people to their employment, education and other services through the

6 Section 110, Localism Act (2011) relating to unmet need.

alignment of the phasing of development and supporting infrastructure, including green infrastructure.

**6.5** The National Planning Policy Framework (2018) requires that Local Planning Authorities, as a minimum, meet their objectively assessed needs (OAN) for both market and affordable housing (as far as is consistent with other policies in the Framework). The most up-to-date work on OAN, and that which is used in this Local Plan is the Housing Needs Study 2018 (HNS, 2018). This 2018 study uses an updated set of demographic projections, taking account of information including 2016 based Sub-National Population Projections from ONS and the 2016 based Household Projections. It also takes account of the Government's new standardised methodology for calculating housing need. This HNS (2018) study supercedes all previous Objectively Assessed Needs Reports published by the Council.

**6.6** As such the figure of 5,520 (from the HNS study, 2018) reflects the necessary housing requirement to satisfy housing need plus additional need arising from the necessity to provide additional affordable housing and opportunities for economic growth. The same report separately identifies an additional requirement of 487 C2 (e.g. care homes / nursing homes bed spaces).

**6.7** The Employment Land Review (ELR) (2018) report appraised a range of employment land projections for Wyre Forest District using a variety of methodologies in accordance with the former Planning Practice guidance (as this being the most up-to-date PPG at the time). A range of factors were considered within the report to help inform the judgement on the appropriate level of employment need for the district. The ELR report concludes that the employment land requirement for Wyre Forest District should be 29ha of land between 2016 and 2036. The Local Plan seeks to allocate sufficient employment land to accommodate this employment need of 29ha.

### Annual requirements

**6.8** Table 6.0.1 also sets out the annual housing requirement for the Wyre Forest District. This is derived by a simple division of the housing requirement (5,520) by the number of years that the Plan will apply (20 years). This equates to an annual housing requirement of 276 dwellings. As discussed in Policy 8B (Affordable Housing) there will be a number of elements that make up the affordable housing component.

**6.9** Sites considered unsuitable (e.g. because of flood risk), not viable or not deliverable have been excluded. As in all plan-making it is also necessary to adopt a precautionary approach to allow for sites that may not be delivered - this is particularly the case for sites with a poor viability (such as brownfield sites). It is therefore necessary to identify some additional sites so that in the event of a site not coming forward, or sites being excluded from the final Plan (consequent to further evidence including consultation outputs), the District is able to demonstrate that the housing and employment requirements can still be met and flexibility is demonstrated.

**6.10** In order to achieve the required flexibility it is necessary to propose allocations in excess of the housing requirement of 5,520. The Plan therefore includes an over allocation of 15%, to allow for sites not coming forward and to be able to maintain a five year housing land supply. At the time of preparation of this consultation document the Council's understanding of how this might be informed was guided by the following available data.

Table 6.0.2

Source of Supply	No. of Dwellings (approx)
Completions (1st April 2016 to 1st September 2018)	521
Under Construction at 1st September 2018	96
Commitments not yet started at 1st September 2018 <sup>(7)</sup>	537
Strategic Allocation Site - Lea Castle Village	1,400
Strategic Allocation Site - Kidderminster Eastern Urban Extension	1,440
Remaining Development Sites:	
Kidderminster Town	988
Stourport-on-Severn	1,069
Bewdley	225
Rural Settlements	65
Total:	6,341

### Duty to Co-operate

**6.11** It is clearly demonstrated by the HNS (2018) that, unusually in the West Midlands, the Wyre Forest District Council area is co-terminus with the Wyre Forest Housing Market Area. As such the housing requirement reflected by this Plan is based solely on that required for the needs of Wyre Forest District. However, this does not negate the need for the Plan to be prepared in consultation with neighbouring and near-by authorities (e.g. other Worcestershire districts, Birmingham and the Black Country, South Staffordshire, Shropshire); accordingly Wyre Forest District has co-operated with authorities that are both adjoining and beyond in order to consider strategic priorities for the delivery of homes, including cross-boundary requirements. The evidence base documents the joint working and other activities demonstrating effective co-operation consistent with the Duty to Cooperate legal requirement and the NPPF.

### Management of land supply

**6.12** The Council’s monitoring of the provision of dwellings demonstrates that, whilst under normal economic circumstances, a fairly consistent supply can be achieved. Under unusually buoyant or depressed economic circumstances extremes (both high and low) of delivery can be evidenced. It is therefore prudent to ensure that the authority is in a position to respond quickly to changing circumstances. Positive planning measures may be required to help bring forward sites for development earlier in the plan period to ensure a five-year supply of sites is able to be sustained. Whilst not exhaustive such initiatives might include:

- a. Working with house builders / landowners / Housing Association Registered Providers, to monitor and progress the housing supply and to identify any causes of supply problems and where appropriate to act on feedback received.

7 \* The Commitments shown in the table do not include lapse rates. At 1st September 2018, the lapse rate was 5%. Applying 5% to the commitments not yet started = 537 x 95% = 510. For further information on completions and commitments please refer to the Council's 5 Year Housing Land Supply Report, which will be updated annually throughout the Plan Period).

- b. Production of detailed Planning Briefs and / or area-based Supplementary Planning Documents, to increase certainty for developers on the progression of sites through the planning process.
- c. Regular meetings with stakeholders about the major urban extensions.
- d. As part of the preparation of Planning Briefs, indicate different development permutations to accommodate different viability scenarios.
- e. Pre-application discussions with developers, landowners and their agents to increase certainty in the development management process.
- f. Sensitive application of policy where issues around scheme viability have been clearly demonstrated.
- g. Prioritise public sector land.
- h. Potential funding streams, such as Homes England and other public funding sources.
- i. Testing of viability through an independent study and liaison with developers about viability issues.
- j. Annual update of the Council's Brownfield Land Register.
- k. Bringing forward Reserved Housing Sites, subject to Policy 7B.

**Policy 6B - Locating New Development**

A The Development Strategy and the site allocations in this Plan (as described by Policies 6C – 6F) are based upon the following principles:

- i. Provide accessible, attractive employment sites and positive policies to deliver job creation opportunities.
- ii. Provide for and facilitate the delivery of sufficient accessible housing to meet objectively assessed needs to 2036.
- iii. Encourage the effective use and re-use of accessible, available and environmentally acceptable brownfield land.
- iv. Safeguard and (wherever possible) enhance the open countryside.
- v. Maintain the openness of the Green Belt (as identified on the Policies Map).
- vi. Focus most development in and adjacent to the urban areas, where both housing needs and accessibility to more effective public service provision are greatest.

B Windfall development proposals will be assessed in accordance with the settlement hierarchy described below:

**Table 6.0.3 Wyre Forest Settlement Hierarchy**

Category	Settlements Included	Role	Suitable Development
Main Town	Kidderminster	<ul style="list-style-type: none"> <li>● Administrative centre of the District</li> <li>● Focus of public services</li> <li>● Focus of employment</li> </ul>	<ul style="list-style-type: none"> <li>● Focus of large scale housing provision including Kidderminster Eastern Extension</li> <li>● Utilisation of appropriate brownfield and greenfield sites, subject to the more detailed Plan policies</li> <li>● Comparison and convenience A1 retail (to meet District requirements and needs)</li> <li>● Commercial leisure</li> <li>● Large and small scale offices</li> <li>● Residential</li> <li>● Employment</li> <li>● Hotels, tourism and leisure</li> <li>● Sports and education facilities</li> <li>● Major services</li> </ul>
Large Market Town	Stourport-on-Severn	<ul style="list-style-type: none"> <li>● Comprehensive range of local services</li> <li>● Employment for residents and those in nearby rural areas</li> <li>● River/Canal based Tourism and leisure</li> </ul>	<ul style="list-style-type: none"> <li>● Support role in the provision of larger scale housing</li> <li>● Utilisation of appropriate brownfield and greenfield sites, subject to the more detailed Plan policies</li> <li>● Convenience A1 retail (to meet the needs of Stourport-on-Severn)</li> <li>● Local services</li> <li>● Employment, offices and commerce</li> </ul>

Category	Settlements Included	Role	Suitable Development
Market Town	Bewdley	<ul style="list-style-type: none"> <li>Fewer services</li> <li>Employment opportunities especially for rural area west of the River Severn</li> <li>Tourism and leisure</li> </ul>	<ul style="list-style-type: none"> <li>Convenience A1 retail to meet local needs.</li> <li>Employment, offices and commerce</li> <li>Housing to meet local needs</li> <li>Leisure and business tourism</li> <li>Local services</li> </ul>
Villages covered (washed over) by Green Belt	Chaddesley Corbett Wolverley Upper Arley	<ul style="list-style-type: none"> <li>Varying ranges of local services and facilities</li> </ul>	<ul style="list-style-type: none"> <li>Housing to meet local needs via allocated sites and rural exceptions sites in appropriate circumstances.</li> <li>Local services.</li> <li>Small scale rural employment including offices</li> </ul>
Other villages and rural settlements	Inset Green Belt: <ul style="list-style-type: none"> <li>Fairfield</li> <li>Cookley</li> <li>Blakedown</li> <li>Wilden</li> <li>Lea Castle</li> </ul> Non Green Belt: <ul style="list-style-type: none"> <li>Clows Top</li> <li>Rock</li> <li>Bliss Gate</li> <li>Far Forest</li> <li>Callow Hill</li> </ul>	<ul style="list-style-type: none"> <li>Varying ranges of local services and facilities</li> <li>Settlements to west of River Severn tend to have a widely dispersed catchment for employment, services etc</li> </ul>	<ul style="list-style-type: none"> <li>Housing to meet local needs via allocated sites and rural exceptions sites in appropriate circumstances.</li> <li>Infill development within settlement boundary</li> <li>Local services</li> <li>Small scale rural employment including offices</li> </ul>
New Village	Inset Green Belt: <ul style="list-style-type: none"> <li>Lea Castle Village</li> </ul>	<ul style="list-style-type: none"> <li>New sustainable village with enough housing to generate a new village centre with local facilities and primary school.</li> <li>To also include employment use.</li> </ul>	<ul style="list-style-type: none"> <li>Residential</li> <li>Employment</li> <li>Sports and education facilities</li> <li>Local services</li> </ul>

C Where a community decides to develop a Neighbourhood Plan the District Council will cooperate with and support the community in this activity so that greater local control over the location of development can be exerted whilst supporting the delivery of the Local Plan. Neighbourhood Plans will need to be consistent with the policies of the Local Plan as a whole and will be expected to support the District in meeting its development needs.

D The open countryside is defined as land beyond any development boundary. In the open countryside development will be strictly controlled and will be limited to dwellings for rural workers, replacement dwellings and rural exception sites (Policy 8C); employment

development in rural areas and buildings for agriculture and forestry (Policy 21B) and renewable energy projects (Policy 24B) and development specifically permitted by other Wyre Forest Local Plan policies.

E The Green Belt (as identified on the Policies Map) will be maintained and development proposed within the Green Belt will be considered in accordance with national policy as set out in the NPPF, and with the policies set out in this Local Plan. In particular, Local Plan Policies 7A, 7B, 18B, 25A and 35.

## Reasoned Justification

**6.13** The development strategy is driven by the Wyre Forest vision and its associated objectives. It brings together land use, development and infrastructure considerations that flow from the economic, environmental and social characteristics of the area. The Sustainability Appraisal (SA) demonstrates that the proposed development strategy will help deliver the SA objectives.

**6.14** The new development strategy builds upon the previous Wyre Forest Core Strategy which concentrated development on the large amount of brownfield land in the urban core of the District. Whilst the new strategy continues to maximise the benefit of this resource it will no longer be possible to be entirely reliant on brownfield land meaning that some greenfield land take will be required. This is due to two key factors:

- a. much of the readily available deliverable brownfield land has now been developed;
- b. the housing requirement of Wyre Forest District is significantly greater than the availability of brownfield land.

**6.15** The purpose of the settlement hierarchy is to provide a clear steer on the future role of the District's settlements and to focus new development in locations which will promote sustainable communities. The settlement hierarchy is based on an assessment of the services and facilities that are available in each settlement and further information on this can be found in the evidence base documents <sup>(8)</sup>.

**6.16** The urban areas of the District have the greatest housing needs and are locations where the cost of public service delivery is relatively low. Accordingly the bulk of development needs that cannot be met via brownfield land (including brownfield land in the Green Belt) will be via greenfield land release adjacent to the main towns, especially Kidderminster. In the other settlements, the allocated growth and future development sites are primarily to meet local needs whilst at the same time ensuring the future sustainability of the settlement.

**6.17** The villages and hamlets in Wyre Forest, particularly to the west of the River Severn, are characterised by close-knit communities that in many places retain links with the traditional rural economy as well as providing some limited services. Sites beyond development boundaries generally are less sustainable as access to local services and employment opportunities tends

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to be poorer and therefore it is appropriate that development in the open countryside is restricted to proposals which are supportive of more specific Local Plan policies, e.g. Policy 21B – Rural Employment.

**6.18** Maintaining the identity and integrity of individual settlements is an important issue for local communities. To the east of the River Severn this is achieved by the West Midlands Green Belt designation. Green Belts serve five purposes (set out in the National Planning Policy Framework), which are:

- to check the unrestricted sprawl of large built up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

**6.19** Locally, the Green Belt continues to serve all the purposes of national policy and the boundaries are considered to be strong and enduring. However, due to the exceptional circumstances of an increased housing demand coupled with a reduced amount of brownfield land and a very tightly constrained Green Belt boundary restricting the ability to develop sustainable locations the District Council considered it necessary to undertake a Green Belt Review through this Local Plan Review (NPPF para 136). Where the Green Belt is fundamental in preventing the neighbouring towns from merging (e.g. between Bewdley and Kidderminster along the A456 corridor and Kidderminster and Stourport-on-Severn along the A451 corridor), it will be particularly important to ensure that the land remains open.

**6.20** The nearest sub-regional centre to Wyre Forest District is Worcester which has a sub-regional function. Additionally, particularly in respect of commuting, there are links with the southern Black Country and Birmingham. Within the District the largest and most important retail and commercial centre is its administrative centre, Kidderminster, which also provides a focus for public services, comparison shopping, etc. This strategy will continue to support the role of Kidderminster and will seek to facilitate its further regeneration through the redevelopment of such key zones as Lion Fields (the Eastern Gateway) and Churchfields.

**6.21** The other Main Town centres at Stourport-on-Severn and Bewdley are smaller and provide a smaller scale and range of retail and other services typically serving their own settlement and their hinterland of smaller settlements and villages. Centres in the villages and rural settlements are again smaller and will typically provide only a limited range of day-to-day retail and other services.

### **Policy 6C - Kidderminster town as the strategic centre of the District**

Kidderminster will continue to be the strategic centre for the District and its role in providing a focus for new housing, commercial, employment, retail, office and leisure development is to be enhanced. New development will focus on the regeneration opportunities on the identified sites within and adjacent to the town. Two sustainable strategic allocation sites are proposed (see Policy 6D).

The future development needs of Kidderminster will be allocated and implemented through Policy 30 (Kidderminster Site Allocations) as well as the “ReWyre Renewed” Strategy.

Development proposals which help to promote Kidderminster as the tourism 'hub' of the District will be encouraged during the plan period. This includes the provision of supporting facilities such as sports facilities, hotels, conferencing facilities and developments that improve the evening / night time economy and cultural offer of the town. Sustainable transport links and infrastructure to promote ease of access to the Wyre Forest, Stourport-on-Severn, Bewdley, West Midland Safari Park and Kidderminster Railway Station will be sought, where practical and viable.

## Reasoned Justification

**6.22** Kidderminster is a former carpet manufacturing town which has been, and is still experiencing economic restructuring as a result of the decline in activity of this industry. Consequently Kidderminster faces a number of economic challenges and contains areas which experience acute deprivation. The challenges include lower than average household incomes, low skill levels and poor educational attainment.

**6.23** There is great potential for regeneration in Kidderminster. The Staffordshire & Worcestershire Canal and River Stour both run through the town centre, providing a significant opportunity to create new waterside destinations. Whilst much of the deliverable brownfield land in the town has now been redeveloped, Kidderminster still benefits from significant areas of brownfield land suitable for redevelopment most notably Lionfields (the Eastern Gateway) and Churchfields.

**6.24** As the District's strategic centre Kidderminster has a unique role within the District. There are key opportunities to improve the town's tourism and employment roles, boosted by the Severn Valley Railway, the West Midland Safari Park, and the economic success of the South Kidderminster Enterprise Park. Overall, opportunities to create additional employment and learning opportunities, improve the natural and built environment, increase tourism and provide new housing, through regeneration are all present in Kidderminster.

**6.25** All new development should make a positive contribution to the vitality and viability of the town and support the creation of a safe, attractive and accessible urban environment and improve both the overall mix of land uses in the town and its connectivity to adjoining areas.

**6.26** The development of a diverse evening/night time economy centred on Kidderminster is seen as an important element in driving the improvement of this strategic centre and the wider District. Careful consideration will be required to determine the number, type and scale of activities and uses to ensure that a rich, inclusive and safe environment is created.

**6.27** There should be sufficient protection/provision of outdoor sports facilities as identified in the Playing Pitch Strategy.

### Policy 6D - Strategic Allocation Sites

The strategic allocation sites are defined on the Policies Map and will come forward in line with the detailed requirements expressed by Policy 31 and Policy 32.

The proposed strategic allocation sites are:

- i. Lea Castle Village (the ex-hospital site at Lea Castle and wider site area) - Policy 31;
- ii. Kidderminster Eastern Extension - Policy 32.

### Reasoned Justification

**6.28** In recognition of the insufficient amount of sustainably located readily available land to accommodate the necessary housing and employment requirement two well-designed sustainable strategic allocation sites are proposed.

**6.29** In line with the NPPF (Para 136) Wyre Forest District Council has determined the need for a review of the Green Belt within the District under the exceptional circumstances provision. This is to specifically accommodate larger scale development such as new settlements or major urban extensions and is necessary due to the scale of development needs identified for the District up until 2036.

**6.30** The proposed housing requirement is 5,520 dwellings for the plan period plus an additional 487 C2 Institutional (e.g. care homes / nursing homes bed spaces). The Plan also allocates in excess of the housing requirement by 15% to allow for sites that may not come forward.

**6.31** The Plan allocates an additional 2,097 dwellings on brownfield sites. Together with existing completions and commitments, this means that 49% of all housing developed in this Plan period will be on brownfield sites. These figures include 600 dwellings at Lea Castle ex-hospital site (this takes into account viability and flood risk issues). There is limited greenfield capacity on suitable and sustainable sites to the west of the River Severn.

**6.32** Therefore to meet the needs of the growing population and ensure that sufficient high quality accessible land is available for residential and economic development the District has proposed two strategic allocation sites which will require the removal of land from the Green Belt. This will enable the delivery of planned sustainable urban development with accompanying primary school, local services and infrastructure. The proposed Lea Castle Village will also include some employment use. *(Note that the total Green Belt land take for the Plan equates to 2.1% for all of the Green Belt site allocations in the Plan).*

**6.33** The District Council will continue to work proactively in these locations with existing landowners, stakeholders and other agencies to bring forward these strategic developments during the plan period.

**Policy 6E - Role of Stourport-on-Severn and Bewdley as Market Towns**

Within the District's market towns of Stourport-on-Severn and Bewdley, both of which have Conservation Areas as their town centres, the following development proposals will be sought:

- Employment, start-up business units and commerce, to provide local employment opportunities and enhance economic viability.
- Current A1 retail provision will be safeguarded where possible, however, diversification proposals will be assessed against their overall positive contribution to the town centre.
- New retail development proposals should be appropriate to the town's position in the District's settlement hierarchy.
- Developments which provide additional community and health facilities for the local area.
- Sustainable transport infrastructure should be enhanced to ensure ease of access to the town's services and facilities, particularly from the surrounding rural areas. Access from the market towns to the higher order services available in Kidderminster will also be improved where practical and viable.
- There will be some Green Belt release to enable the market towns to contribute to the housing requirement whilst addressing the need for sustainability and cost effective infrastructure provision (see Policy 33 and 34).
- Sufficient protection/provision of outdoor sports facilities.

### Stourport-on-Severn:

- Due to its role in the settlement hierarchy and mix of employment and service opportunities, Stourport-on-Severn is expected to make an important contribution to meeting the District's requirements for new homes. The focus will be on existing brownfield sites within the town supplemented by some greenfield release.
- Developments which will increase the variety and mix of the tourism offer in the town will be encouraged and facilities which focus on heritage tourism, particularly capitalising on the historic canal basins, will be especially promoted.
- Development within the three Conservation Areas should preserve or enhance those areas.
- The proposed allocations for Stourport-on-Severn are detailed at Policy 33.

### Bewdley:

- Bewdley's contribution towards the District's housing need will be limited to meet local needs on allocated sites. This reflects the town's conservation context and the more limited availability of jobs and services within the town. Some limited greenfield development will be permitted to enable this.
- The role of Bewdley as a sustainable tourist destination is to be enhanced, with sustainable transport links to the Wyre Forest, Severn Valley Railway, West Midland Safari and Leisure Park and Kidderminster Rail station being a particular focus, where practical and viable.
- Development within the Bewdley and Wribbenhall Conservation Areas should preserve or enhance those areas.
- The proposed allocations for Bewdley are detailed at Policy 34.

### Reasoned Justification

**6.34** Within market towns, local people and those in the surrounding rural hinterland, should be able to buy most things they need and have sufficient access to housing, jobs, education and entertainment.

**6.35** The geography of the District means that Kidderminster is just 3 miles from each of the market towns with the potential for good public transport links between them. Therefore, the need for Bewdley and Stourport-on-Severn to provide facilities and services should be balanced with their proximity to Kidderminster and the services it provides in its function as the strategic centre of the District.

**6.36** There should be sufficient protection/provision of outdoor sports facilities as identified in the Playing Pitch Strategy.

## Stourport-on-Severn

**6.37** With a population of 20,000 Stourport-on-Severn is a large market town that is well served by local amenities such as shops and community facilities. It is relatively well served by public transport, although some outlying housing estates have poor access to bus services. The town provides a good level of existing employment opportunities.

**6.38** The town has the potential to accommodate a significant amount of new development on brownfield sites within or adjacent to the town centre. However, regeneration will need to be carefully considered in the context of the town's historic character and heritage in addition to the settlement hierarchy.

**6.39** In Stourport-on-Severn town centre congestion is an issue because the current road layout, pedestrian arrangements and lack of alternative routes (including bridge access and capacity). In respect of future development in and around the town the strategic transport infrastructure in the town is therefore a key consideration. Accessibility to the town centre by alternative modes for residents and visitors alike is extremely important to the town's future functionality and viability.

**6.40** Stourport-on-Severn has unique origins as a canal town and has five historic basins which have recently undergone a major restoration programme. The town is also located on the banks of the River Severn which has helped it become a popular visitor destination. The town is a particular attraction for day trippers, especially for people from the Birmingham and Black Country areas. The tourism offer of the town has a great potential for generating economic activity, but this has not been fully utilised in the past. A key opportunity is available to promote Stourport-on-Severn's history as a canal town with its historic basins and take advantage of its heritage assets. This would help to enable the town to tap into new tourism markets and potentially attract a higher-spending, longer-stay visitor.

## Bewdley

**6.41** Bewdley has a smaller population at around 9,000 but has a greater interdependent relationship with the surrounding rural parishes.

**6.42** There is a reasonable level of service provision in the town with shopping and community facilities to serve the local population. However, higher order services and goods are on offer in Kidderminster and therefore are available within a short distance from Bewdley.

**6.43** Employment opportunities are very limited within the town with the majority of workers having to commute out to the surrounding areas.

**6.44** Like Stourport-on-Severn, Bewdley is also a popular tourist destination. This is largely due to its attractive and historic Georgian architecture, its setting on the River Severn, the West Midland Safari Park and the Severn Valley Railway station close to the centre. The town's setting within the countryside is also an important factor and the Wyre Forest is located just on the town's outskirts. Therefore, Bewdley is well located within a tourist setting and provides opportunities for developing sustainable tourism.

**6.45** The ability to accommodate new development on brownfield sites within or adjacent to the town centre is limited due to the heritage setting of the town as well as its topography and the Welch Gate Air Quality Management Area. Development within the town's Conservation Area itself, which covers most of the town centre, is especially sensitive and will need to preserve or enhance the special character and appearance of the area. There are few development opportunities within the built environment and conservation is a priority.

**Policy 6F - Role of the villages and rural areas**

**Sustaining Community Facilities and Services**

- Developments that provide the rural community with essential facilities and services will be supported in principle.
- The network of local groups of shops and public houses will be safeguarded in order to support nearby settlements and reduce the need to travel.
- Kidderminster, Stourport-on-Severn and Bewdley will remain the most sustainable places to provide higher order services and facilities to the rural areas, but access to them by public transport should be improved.

**Providing Housing for Local Need**

- New residential development in the District's villages, rural settlements and other rural hamlets will be to meet local housing needs, as established through the Housing Needs Study and parish surveys (Policy 8C - Rural Exception Sites, and Policy 18B - Residential Infill Development).

**The Rural Economy**

- The rural economy will be supported by promoting development which contributes to rural employment sectors as well as encouraging appropriate farm diversification schemes.
- Development proposals will not be permitted where they would be likely to have direct and significant impact on the District's best and most versatile agricultural land.
- Historic farmsteads will be protected from inappropriate development (for details refer to Policy 26 and Policy 28A).
- The provision of rural based workspace and live/work units will be permitted providing:
  - i. the proposals are small scale (i.e. not major development);
  - ii. that they are appropriate to the character of the area;
  - iii. that they do not have an adverse impact on the Green Belt.

Priority will be placed on the re-use or replacement of existing rural buildings.

The proposed allocations for the villages and rural areas of Wyre Forest are detailed at Policy 36.

Policy 35 identifies proposed allocations for previously developed sites in the Green Belt.

### Reasoned Justification

**6.46** Agriculture is the predominant land use within the District's rural areas. The quality of agricultural land is generally very high in the area running from east and south east of Kidderminster to the District boundary. There are also significant blocks of high quality land to the north of Kidderminster and around Rock.

**6.47** Economic and employment opportunities in rural areas go beyond the traditional land based and agricultural sectors. There are great opportunities for sustainable farm diversification, particularly with regard to the tourism and leisure sectors. New employment opportunity sectors such as creative industries and environmental technologies may also be available in rural areas. The provision of superfast and ultrafast broadband in addition to the availability of mobile infrastructure able to provide 2G, 3G, 4G and increasingly 5G coverage will be essential in developing the economic base of the rural areas.

**6.48** Equestrian activities are also prominent uses in rural areas. <sup>0</sup>Commercial equestrian development in particular, can contribute significantly to the rural economy and provide employment for local people. However, equine related development will need to be balanced with the potential impact on the landscape and character of the rural environment and the continued need to preserve the best and most versatile agricultural land to enable localised food production in the future.

**6.49** However, the economic development of the District's rural areas does not need to be at the expense of environmental protection and enhancement and must be balanced by the pressure to regenerate the adjacent towns.

**6.50** Sustainable living is as important in rural areas as it is in urban areas. Measures that encourage working practices that cut down on commuting and improve the work/life balance should be encouraged. It is also important to help establish lifestyle changes that support the local economy and the sustainability of the rural community. However, much of the rural area is close to the combined urban area of Kidderminster, Stourport-on-Severn and Bewdley and to the employment opportunities and services they provide. Therefore, significant numbers of the rural population will rely on these centres regularly to access these facilities. Transport links between the urban and rural areas should be improved to increase the sustainability of the relationship between the two areas.

### Policies Map

**6.51** Throughout the Local Plan, reference is made to the Policies Map. This includes statutory designations for areas such as Green Belt, Sites of Special Scientific Interest (SSSI) and Nature Reserves. It also includes site specific allocations for residential, employment, retail and community uses. The map makes it easier to identify the major areas for change as well as those for protection.

**6.52** The Policies Map and the maps throughout the Local Plan use Ordnance Survey base maps which are Crown Copy right protected (Ordnance Survey 100018317 (2018)).



### Introduction

**7.1** The establishment and maintenance of Green Belts around many of England's main urban areas has long been a part of national planning policy designed to strictly control development. The Green Belt (GB) within the administrative Area of Wyre Forest District Council is part of the larger West Midlands Green Belt and was intended to prevent urban sprawl, restrict the expansion of villages and protect the open countryside from the pressure for development.

#### Summary of Preferred Options Responses

There was some acknowledgement that previously developed land alone will not be sufficient to meet the growth requirements of the District.

Support was given to the Council's commitment to Green Belt review through the Local Plan preparation process. It was acknowledged that this will enable development to be brought forward in a number of sustainable locations.

A clearer explanation is required as to what the "exceptional circumstances" are to justify Green Belt release.

Some responses suggested consideration should be given to the need to identify additional or alternative areas of 'Safeguarded Land' between the urban areas and the Green Belt, in order to meet the longer-term development needs of the District.

A number of local residents raised the importance of protecting the Green Belt; though some mistakenly were under the impression that Green Belt is a landscape protection tool.

There were objections to some of the existing ADR sites being used for development; although this is a misconception as these sites have already been removed from the Green Belt.

There was some support for the concept of sustainable urban extensions to the north and east of Kidderminster with general support for the use of the Lea Castle Hospital site. This was however accompanied by the expression of concern at the loss of Green Belt.

#### Summary of Issues and Options Responses

A number of local residents raised the importance of protecting the Green Belt; though some mistakenly were under the impression that Green Belt is a landscape protection tool.

Some comments were received from landowners regarding concerns that the Issues and Options document failed to address the relationship between the Green Belt, brownfield land availability, housing completions and employment opportunities.

Issues raised by key stakeholders included the need to look at the potential to focus new development around strategic transport infrastructure and the progression of a strategic Green Belt Boundary Review.

There was some support for the concept of sustainable urban extensions to the north and east of Kidderminster with general support for the use of the Lea Castle Hospital Site and the prioritised use of ADR sites. This was however accompanied by the expression of some concern at the loss of Green Belt.

### **Policy 7A - Strategic Green Belt Review**

The District's most up-to-date Green Belt boundaries are identified on the Policies Map.

There is a general presumption against inappropriate development within the Green Belt, and such development will not be permitted unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings in the Green Belt, will be assessed in relation to the relevant national planning policy.

The important role of the District's Green Belt will be recognised and protected, with the majority of new development being channelled towards the most sustainable Main Towns of Kidderminster, Stourport-on-Severn and Bewdley, many parts of which are bounded by the Green Belt.

In accordance with paragraph 136 of the National Planning Policy Framework, a number of changes will be made to the Green Belt boundaries to support the strategic development of Wyre Forest through this Plan. The following areas will be removed from the Green Belt to accommodate future development needs and are shown on the Policies Map. Where appropriate, further details are provided in Policies 30, 31, 32, 33, 34, 35 and 36:

- Changes to the Green Belt boundary to enable sustainable development at two strategic allocation sites:
  - i. to the north of Kidderminster, to enable the Lea Castle Village development.
  - ii. the eastern edge of Kidderminster urban area.
- Changes to the Green Belt boundary will also be made at locations around Kidderminster, Stourport-on-Severn and Bewdley to enable the development needs for the District to be met most sustainably and economically.
- The following Areas of Development Restraint (ADRs) (see Site Allocations and Policies Local Plan, adopted 2013) will be released for residential development, in accordance with Local Plan Policies 30.12 and 33.13:
  - i. Hurcott ADR (land between A451 and Hurcott village) - green gap to be maintained as per Policy 30.12;
  - ii. Four Acres Caravan Park, Stourport-on-Severn (in accordance with Policy 33.13).

The Policies Map also shows the villages that continue to be included in the Green Belt. These villages will be protected from inappropriate development due to the important contribution which the open character of the village makes to the openness of the Green

Belt. However, limited infilling in these locations may be considered appropriate if in accordance with Policy 25, Policy 18B and NPPF Green Belt policy. Any proposal in these locations will be expected to be of an appropriate density to reflect surrounding properties and should not impact negatively on the openness and character of the wider Green Belt.

Limited affordable housing for local community needs in the Green Belt will be supported on rural exception sites where the development complies with Policies 8B (Affordable Housing Provision) and Policy 8C (Addressing Rural Housing Needs).

Opportunities to enhance the beneficial use of the Green Belt and improve public access to Green Belt areas will be supported in line with the National Planning Policy Framework and Policy 25A (Safeguarding the Green Belt).

This policy should also be used in conjunction with Policy 35 (Part C of Plan), which permits certain forms of development at identified Previously Developed Sites in the Green Belt (as shown on the Policies Map).

### Reasoned Justification

**7.2** The WFDC Green Belt was originally determined in the mid-1970s and was subsequently confirmed in detail by the Wyre Forest Urban Areas Local Plan, adopted in 1989. Subsequent Local Plan Reviews (1994, 2004 and 2010) did not identify the need for any significant changes although some limited adjustments around a number of the larger villages were made.

**7.3** Within the WFDC administrative area, the current 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, Fairfield and Wilden. There are three villages included within the Green Belt (i.e. washed over by Green Belt). These three villages are Chaddesley Corbett, Wolverley and Upper Arley.

**7.4** Provision for longer-term development was made in the 1996 Adopted Local Plan through the adoption of a number of Areas of Development Restraint (ADRs). ADRs are areas of land which have been 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 existing ADRs are as follows:

- Land between A451 and Hurcott Village, Kidderminster
- Land off Hayes Road, Fairfield
- Land off Lowe Lane, Fairfield
- Land off Kimberlee Avenue, Cookley
- Land off Wilden Top Road, Stourport-on-Severn
- Four Acres Caravan Park, Stourport-on-Severn

**7.5** With the exception of the Hurcott ADR and the Four Acres Caravan Park ADR, it is proposed to maintain the current ADR sites as Reserved Housing Sites (Safeguarded Land) as per Policy 7B. 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 as per Policy 30.12 'Land at Stourbridge Road BW/4 south'. 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 Policy 33.13. The other ADR sites are greenfield and will remain as Safeguarded Land (Policy 7B). They 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.

## Green Belt review

**7.6** The important role of the Green Belt is fully recognised. The NPPF (para 133) states that "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." The Green Belt serves five purposes as set out at paragraph 6.17.

**7.7** The NPPF (para 136) 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. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period."

**7.8** Whilst the District Council has been able to adopt subsequent Local Plans without requiring incursions into the Green Belt or requiring the development of ADRs to meet development needs, the time has come for the District Council to look beyond the boundaries of its urban areas for sites to meet the District's development needs.

**7.9** The Local Plan seeks to minimise the impact of development upon the Green Belt. However, it has been concluded that there are now exceptional circumstances which justify a review of the Green Belt boundary. It is proposed that the existing Green Belt boundary should be amended for the need to locate development to the most sustainable settlements and locations where there is easy access to a range of existing services and facilities and supporting infrastructure.

**7.10** The Strategic Review of the Green Belt in Wyre Forest District is justified for the following two key reasons:

- i. National Planning Policy Framework (NPPF) makes it clear that it is necessary for the evidence base for all Local Plans to be up-to-date. As stated above the Wyre Forest Green Belt was instituted in the mid-1970s and has not been subjected to fundamental review since. The District Council therefore needs to provide up-to-date evidence to support its Green Belt policies. To achieve this it is necessary to perform a review to demonstrate that the Green Belt boundary within the District remain robust and defensible so that it can effectively fulfil the five purposes set out in the NPPF (para 134). The NPPF requires that Green Belt boundary reviews must be established through strategic policies during the preparation or updating of plans.
- ii. Wyre Forest has been successful in utilising previously developed land to meet its housing and employment land requirements in previous adopted Local Plans. However, in this Local Plan period (up to 2036) previously developed land on its own will not be sufficient to

accommodate all development needs. It will therefore be necessary to ensure that the most appropriate and sustainable locations are utilised for future development whilst at the same time protecting the future role and functions of the Green Belt in a robust and thoroughly evidenced way. This will require some strategic adjustments to the Green Belt boundary.

**7.11** A Strategic Green Belt Study (AMEC 2016) and a more detailed Second Stage Green Belt Study (AMEC 2017, and updated in 2018) form that robust evidence base. These studies demonstrate that across the District the Green Belt fulfils its intended strategic purpose as part of the West Midlands Green Belt with many instances of more than one Green Belt purpose being fulfilled.

**7.12** These studies have formed a key part of the evidence base in deriving the policy options and decisions in the preparation of the Strategic, Development Management and Allocations Policies contained within this document. It is important to note that the NPPF also requires the consideration of whether the Green Belt boundary will remain appropriate to meet the District's needs beyond 2036.

### **Wyre Forest District Exceptional Circumstances**

**7.13** The Wyre Forest District Housing Need Assessment (2018) highlights Wyre Forest District's housing need to be at least 5,520 homes to 2036 (based on 276 dwellings per annum). Having undertaken a comprehensive review of the Green Belt together with a full analysis of other relevant evidence, it has become clear that the Council cannot physically accommodate all of this need within its existing urban areas.

**7.14** 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.

**7.15** 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 Green Belt land must be utilised.

**7.16** Without the release of land for development that is currently in the Green Belt, it is highly unlikely the District would be in a position to demonstrate a continuous five year supply of housing land or a continuous supply of employment land over 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.

### **Policy 7B - Reserved Housing Sites in the Green Belt**

1. The areas of Reserved Housing Sites (Safeguarded Land) comprise the following sites and are shown on the Policies Map.

- a. Land off Hayes Road, Fairfield (WFR/WC/23);
- b. Land off Lowe Lane, Fairfield (WFR/WC/22);
- c. Land off Kimberlee Avenue, Cookley (WFR/WC/10);
- d. Land off Wilden Top Road, Wilden (MI/21);
- e. Lawnswood, Cookley (WFR/WC/12).

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. An ecological appraisal of the site will also be required where necessary to demonstrate no net loss of biodiversity (in accordance with the GI policies in this Plan).

2. If the Council is unable to meet the NPPF requirement of being able to demonstrate a 5 year supply of land for housing or where the Housing Delivery Test indicates that housing delivery was substantially below the housing requirement over the previous three years, then sites allocated as 'Reserved Housing Sites' within the adopted Local Plan, will be considered for development if the applicant can demonstrate why the site should be released in advance of other allocated sites within this Plan or prior to the completion of any future Local Plan review, including consideration of the harm that might arise by its early release and submission of Very Special Circumstances.

## Reasoned Justification

**7.17** The NPPF sets the approach to defining the Green Belt boundaries. Its purpose is to help ensure that the Green Belt (as defined in this Plan) endures beyond the Plan period and that defensible boundaries are maintained.

**7.18** Paragraph 139 of the NPPF expressly mentions the opportunity to safeguard land within the Green Belt as part of a Local Plan. It is not however allocated for development at the present time and is instead identified for consideration through future Plan reviews. As such, planning permission for the permanent development of safeguarded land will only be granted following a Local Plan review or Neighbourhood Plan which proposed the development. For clarity, in this Local Plan 'safeguarded sites' are referred to as 'Reserved Housing Sites'. Reserved Housing Sites are areas of land which have been taken out of the Green Belt to meet longer-term housing needs. They are treated as Green Belt land until they are allocated for development through the plan making process.

**7.19** The NPPF requires local planning authorities to demonstrate a five-year supply of deliverable housing sites. If the Council is unable to demonstrate a 5 year supply of land for housing, then sites allocated as 'Reserved Housing Sites' within the adopted Local Plan will provide the first option to consider for development if sites are not available to meet the desired requirement in other, sequentially preferable locations. The applicant will need to demonstrate why the site should be released in advance of the completion of the Local Plan review, including consideration of the harm that might arise from its early release. This is to allow flexibility in the Local Plan if a 5 year housing land supply cannot be demonstrated. Inappropriate development on non-allocated sites within the Green Belt will not be supported.

**7.20** The Council considers this flexible approach to adapt to rapid change will support sustainable development, support on-going commitment to Duty to Co-operate, and assist the long term protection and management of the Green Belt in the District.

**7.21** The Council would encourage early pre-application discussions for any proposals on Reserved Housing Sites.

## Introduction

**8.1** The 2018 Housing Need Study has evidenced the overall requirement for 276 new dwellings per annum over the new plan period. This would total 5,520 new dwellings (before discounting those already built or granted permission since 2016) plus 487 C2 Institutional (e.g. Residential Care Homes) over the whole plan period. The policies contained in this section set out how new housing types will be delivered within the District in accordance with the overarching Development Strategy policies at Section 6. They also address site provision for gypsies, travellers and travelling showpeople during the new plan period.

**8.2** 2011 Census migration data suggests that 66.1% of all household moves are within the Wyre Forest District area and that 59.1% of residents in employment work within the District. Of the individuals who work in the District, 74.4% also live within Wyre Forest. Therefore Wyre Forest is a largely self contained Housing Market Area. A review of market signals data undertaken in 2016/17 suggests that the Housing Market in this area is relatively stable.

**8.3** The Housing White Paper (February 2017) has set out more specific requirements for housing types to encourage greater delivery of housing and to promote home ownership. National Housing Policy focuses on building more affordable housing; improving the quality of rented housing; helping more people to buy a home and providing housing support for vulnerable people. Policies within the Local Plan will be required to take account of this and to set out a proactive approach to delivery to meet specific needs.

### Summary of Consultation Responses from Issues and Options Consultation

- This topic generated much debate but most respondents agreed that the final housing mix policy will need to reflect latest evidence for the Housing Market Area and needs identified.
- The current housing density policy has little support and again should reflect the latest evidence.
- Affordable housing issues are likely to be complicated by recent changes to Government policy and changes arising from the Housing White Paper.
- Respondents consider that further research needs to be done on specialist housing provision requirements. And more proactive policies incorporated into the Local Plan.
- The issue of gypsy site provision provoked much debate and gave no clear cut answers as to the best way forward.

### Policy 8A - Housing Density & Mix

A minimum annual average target of 276 new dwellings will be delivered during the plan period to 2036.

New housing developments must be well designed and address local housing needs incorporating a range of different types, tenures and sizes of housing to create mixed communities.

On the basis of dwelling size data including the data obtained from the Housing Register, which considers needs over aspirations and includes both general and supported housing needs (including housing needs for older people). Table 8.0.1 provides an indicative view on the likely overall dwelling size required. Actual mix of housing will be influenced by both the market and housing needs specific to the site.

**Table 8.0.1**

<b>Table 8.0.1 - Suggested dwelling mix for 276 units by market and affordable dwellings (including all types of housing need)</b>		
Unit size	Market	Affordable
One bedroom	24	23
Two bedroom	87	23
Three + bedroom	96	23
<b>Total</b>	<b>206</b>	<b>69</b>

*Source: Derived from Table 7.6 Housing Need Study (arc4, September 2018)*

The make up of individual developments, their design and density will be in sympathy with the development context (e.g. brownfield development in a town centre or greenfield) and existing neighbouring development. It is anticipated that new greenfield developments in town centres will have an average density of 35 dwellings per hectare, unless it can be shown that there are strong reasons why this would be in conflict with the development context and existing neighbouring development area. Individual site characteristics may mean that this level of density is not achievable on all greenfield developments and this will need to be evidenced by the applicant through an independently verified financial viability assessment.

## Reasoned Justification

**8.4** The Local Plan needs to plan positively for a mix of housing based on an assessment of the population that will live in the District both now and in the future. Housing mix refers to both the size of property (number of bedrooms) and the type of housing – whether detached, semi-detached, terraced or apartments. Housing completions over the last 9 years within the District have provided a good mix of house types and sizes.

**8.5** Within the District, 71.23% of dwellings are owner occupied, 14.44% are social rented and 14.33% are private rented. The 2016 OAHN Report undertook an analysis of stakeholder feedback into housing priorities for the District. This is set out in the table below:

**Table 8.0.2 Ranking of priorities by stakeholders**

High Housing Priorities	Percentage
Properties Designed for Older People	75
Affordable Homes to Rent	63
Affordable Homes to Buy	44
Properties for People with Specialist Needs	40
Improving Quality of Existing Stock	31
Building Open Market Homes	12
Executive Housing	6

*NB: Percentages do not add up to 100% since respondents were permitted to nominate more than one priority*

**8.6** Analysis (arc4, September 2018) indicates a particular requirement for the development of 2 and 3 bedroom market dwellings and a mix of 1, 2 and 3+ affordable dwellings. The affordable dwellings data is derived from the Housing Register which restricts people to housing need / housing benefit eligibility and rather than housing aspirations and so the Council would seek to provide a higher ratio of 2 and 3 bedroom properties to meet current and future housing requirements.

**8.7** This broadly accords with the findings of stakeholder consultation which suggests that there is a mix of size and tenure needed across the District to support a spectrum of needs, cater for demand and attract people to the area.

**8.8** In the preparation of the April 2017 Objectively Assessed Housing Needs stakeholders were asked to identify what types of housing they thought should be built. The following were mentioned:

- larger affordable family homes;

- two- and three-bedroom homes for families;
- executive homes;
- housing for the elderly including bungalows and lifetime homes, in addition to extra care schemes;
- specialist housing to support specific household groups identified as in need; and
- smaller one bedroom flats to rent.

**8.9** The NPPF emphasises the need to set minimum standards of density for cities and towns as part of the Local Plan, and in particular it establishes that the minimum standard should be a significant uplift in average density. The 35 dwellings per hectare standard meets this requirement. This standard is considered viable for most development in greenfield sites in town centres, and it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Different density standards could be supported where necessary to ensure the development is in sympathy with the development context and existing neighbouring development.

### **Policy 8B - Affordable Housing Provision**

#### **Level of Provision**

A minimum annual average target of 90 affordable dwellings will be delivered during the plan period to 2036.

Affordable housing provision of a minimum of 25% on sites of 10 or more homes, or sites of an area of 0.5 hectares or more, will generally be required. Individual site characteristics may mean that this level of provision is not achievable on all development sites and this will need to be evidenced by the applicant through an independently verified financial viability assessment.

If a development scheme comes forward which is below these thresholds and thus does not require the provision of affordable housing, but the scheme is followed by an obviously linked subsequent development scheme at any point where the original permission remains extant, or up to 5 years following completion of the first scheme, then, if the combined total of dwellings provided by the first scheme and the subsequent scheme/s provide 10 or more (or the area of the site of the first scheme and the subsequent scheme/s is 0.5 hectares or more), then an affordable housing provision of a minimum of 25% will be enforced, with the precise level of affordable housing to be provided being 'back dated' to include the earlier scheme(s).

Vacant Building Credit will apply to brownfield land where vacant buildings are being reused or redeveloped. Vacant building will need to meet all the following criteria:

1. The building is not in use at the time the application is submitted, and has not been in continuous use for any six months during the last five years up to the date of the planning application is submitted.
2. The building is not covered by an extant permission, or a permission expired within the six months up to the date of the planning permission is submitted.
3. The building has not been made vacant for the sole purpose of redevelopment: the applicant will be required to provide evidence that the site has been actively marketed for at least two of those three years at realistic prices, and that no financially viable interest has been expressed.

### **Tenure Split**

An indicative tenure split of 65% rented (including social rent) and 35% intermediate tenure (including sub-market private rent and shared ownership) will be sought for affordable housing provision on new sites. The exact split will be determined on a site by site basis based on housing need and viability (if relevant).

### **Affordable Housing led schemes**

Where Registered Providers want to develop sites where the intention is to provide higher numbers of affordable housing units than the planning obligations require but would still need some enabling market housing to make the site viable, the number, tenure and type of units will be agreed on a site by site basis. This will be used on both housing needs information and viability. The number of enabling dwellings should not be higher than the number of affordable dwellings and would not normally exceed more than 20% of the overall number.

### **Build to Rent Schemes**

The District Council will support the development of Build To Rent proposals which will offer a mixture of houses at market rent and Affordable Private Rent, aimed at lower to middle income households. Such schemes should demonstrate that they have fully considered the incorporation of a proportion of homes to be made available at a Affordable Private Rent. They should also offer security of tenure through tenancy agreements of 3 years or more. Any impacts on the market rate will be taken into account by the Council at viability assessment stage.

### **Entry Level Exception Sites**

The District Council will work with the Town and Parish Councils, Community Led Housing Groups and Neighbourhood Planning Forums to identify appropriate sites for entry-level exception sites. Such schemes will be subject to the following criteria:

- i. The site provides entry-level homes suitable for first time buyers (or equivalent, for those looking to rent). The scheme should include provisions to maintain houses at an affordable price or rent for future eligible households. Where legislation prevents this from happening then agreement must be reached with the Registered Provider to find a replacement unit if the original property is sold at market price.

- ii. The site is adjacent to the existing settlement, and should be accessible to local services and facilities.
- iii. The number, size, type, mix and tenure of dwellings must not exceed the extent of identified local need.
- iv. The scale of the scheme should be appropriate to the size and character of the settlement and must not damage the character of the settlement or the surrounding landscape.
- v. Any enabling market housing required to make the development of affordable dwelling on the site viable must be accompanied by a robust viability assessment (open book) in order to justify the required enabling development. The number of dwellings should not be higher than the number of affordable dwellings and would not normally exceed more than 20% of the overall number.

### Reasoned Justification

**8.10** The definition of Affordable Housing, Build to Rent and Affordable Private Rent is consistent with the National Planning Policy Framework.

**8.11** The Wyre Forest Housing Need Study (September 2018) establishes an affordable housing need of 158 dwellings per annum over the new plan period. However it could render the plan unviable to expect this level of affordable housing delivery and this level is unrealistic in light of delivery in recent years. Over the period April 2010 to September 2015, Council data indicates a total of 521 affordable dwellings have been built – an annual average of 96 affordable dwellings. The anticipated future supply of affordable homes over the next five years will be around 90 per year.

**8.12** Analysis undertaken suggests that for open market housing rental within the District the minimum income required is £23,280 for lower quartile renting. For house purchase an annual income of £33,429 is required for entry level house prices. The table below sets out the affordability ratios (based on 3.5 x household income ratios) across the District for housing products.

**Table 8.0.3**

Housing Type/Product	% of District Population who can afford
Median House Prices	40.0
Average House Prices	16.5
Lower quartile House Prices	43.4
Shared Ownership (50% and 25%)	42.9% and 56.7%
Help to Buy	63.0
Median rent	59.8

Housing Type/Product	% of District Population who can afford
Average rent	43.8
Lower quartile rent	66.3
Affordable rent	70.8
Social rent	77.6

**8.13** Evidence suggests that there is a significant need for affordable housing within the District. In particular, the table above demonstrates that more rental properties are required, with the greatest need being for social rent. The current level of housing need as evidenced in the Housing Needs Study supports the Council in having a preference for social rented units but the inclusion of affordable rent and other intermediate housing within the overall affordable housing mix including affordable private rent schemes and discounted home ownership will be sought in line with the NPPF and Housing White Paper. This will need to be delivered through a combination of policy measures and proposals including 100% provision of affordable housing on sites (including exception sites); Section 106 provision as part of the overall mix on sites over 10 dwellings or above 0.5 hectare, according to the NPPF definition of major development; schemes for build to rent which incorporate affordable private rent properties; and below market private rent and starter homes provision.

**8.14** The District is required to set an overall minimum target for the Wyre Forest District area for the amount of affordable housing to be provided per annum. This target should take account of local assessment of need and also be subject to viability assessment to ensure that it is deliverable. Viability testing has suggested that a minimum figure of 25% affordable housing provision on new sites would be appropriate for the area. This could be informed by individual viability assessments. The past annual average delivery of 96 affordable dwellings would suggest that it may be more appropriate to set a target of 90 per annum, particularly with the Government's new emphasis on promoting schemes for affordable rent and other intermediate tenures.

The District Council supports the reuse and redevelopment of brownfield sites and the reuse of vacant buildings for housing. Acknowledging that redevelopment of vacant buildings incur additional costs compared to greenfield site development of the same size and typology, the District aims to implement the Vacant Building Credit methodology established in the NPPF and PPG. The Policy outlines the requirement to define a vacant building, as opposed to a building made vacant for the sole purpose of development and to an abandoned building, two situations where the Vacant Building Credit does not apply according to the NPPF and PPG.

The Housing Needs Study and Viability evidence suggests an overall tenure split of 65% rented (including social rent) and 35% intermediate tenure dwellings. It is therefore recommended that a 65% rented and 35% intermediate tenure split is appropriate for affordable housing provision. According to the Housing Needs Study 22% of households in the district can't afford affordable housing at social rent levels. The Council will therefore seek social rent as the dominate tenure type within the 65% split.

**Policy 8C - Addressing Rural Housing Needs**

The provision of residential development to meet specific local needs within the District's rural settlements will be encouraged. Residential development will be permitted where it is in accordance with the relevant rural development or Green Belt policies as contained within the Local Plan. Residential schemes that take account of local housing needs on windfall sites will be positively considered within the rural areas. Housing should be located where it will enhance and maintain the vitality of rural communities and within the settlement boundary.

**Rural Exception Sites**

The District Council will work closely with the Parish Councils, Registered Providers, Community Led Housing Groups and Neighbourhood Planning Forums to identify appropriate sites for rural exception schemes. Such schemes will be subject to the following criteria:

- i. The provision of affordable housing must remain so in perpetuity in agreement with the Registered Provider but where legislation prevents this from happening then agreement must be reached with the Registered Provider to find a replacement unit if the original property is sold.
- ii. The number, size, type, mix and tenure of dwellings must not exceed the extent of identified local need.
- iii. The scale of the scheme should be appropriate to the size and character of the settlement and must not damage the character of the settlement or the surrounding landscape.
- iv. The site should be accessible to local services and facilities.
- v. Any enabling market housing required to make the development of affordable dwelling on the site viable must be accompanied by a robust viability assessment in order to justify the required enabling development. The number of enabling market dwellings should not be higher than the number of affordable dwellings and would normally be expected to be up to 20% of the overall number.

**Rural Workers Dwellings**

Applications for rural workers' dwellings will be permitted where it can be clearly demonstrated that:

- i. There is a clear and established existing functional need.
- ii. The need relates to a full time rural worker who is employed locally in livestock management, agriculture/agricultural contracting or forestry.
- iii. The proposed dwelling is of a size commensurate with the functional requirement and need of the worker's household.
- iv. Wherever possible, the dwelling is sited within, and designed in relation to the main building complex where the worker works, or a nearby group of dwellings.

Where permission is given for such dwellings, occupation of the dwelling will be restricted by condition to a person solely employed in the locality in livestock management, agriculture/agricultural contracting or forestry, or a widow or widower of such a person, and any resident dependants. The removal of an occupancy condition will only be permitted where it has been demonstrated that there is no longer a need for the unit to be occupied by a person employed locally in livestock management, agriculture/agricultural contracting or forestry, or by a widow or widower of such person and any resident dependants. Any application for the removal of an occupancy condition should include evidence to demonstrate that the dwelling with the occupancy condition in place has been actively marketed to rural workers or potential rural workers employed locally for a period of 12 months, at a price which reflects the existence of an occupancy condition, and that no financially viable interest has been expressed from within the District or its adjoining parishes.

### Replacement Dwellings in the Open Countryside

The replacement of a permanent existing lawful dwelling will be permitted in the following circumstances:

- i. The dwelling is subject to residential use and has not been abandoned.
- ii. The replacement dwelling is in the same or less prominent position as the original with curtilage only being amended or required by re-siting, landscape enhancement, vehicular safety or neighbour amenity.
- iii. The replacement dwelling should not be materially larger than the one it replaces. In this respect the District Council will apply the following size criteria;
  - If the dwelling is in its 'original' form – the existing size plus 20% floorspace increase;
  - If the dwelling has been extended beyond its original form – the existing size.

When considering comparisons in size, the District Council will have particular regard to floorspace, volume and height.

The terms 'original' form refers to the floorspace, volume, and height of the building as it was originally built, or as existed on 1st July 1948. The term 'existing' size refers to the floorspace, volume and height of the existing dwelling.

In respect of all of the categories contained within this Policy the costs of any independent assessment that is required will be met by the applicant.

### Reasoned Justification

**8.15** The District's rural areas have some of the most expensive house prices within the District, which means that many local families who wish to remain are priced out of the market. In addition, more elderly residents may wish to downsize to smaller properties and bungalows which in turn will release housing opportunities for families. The Housing Needs Study report (September 2018) demonstrates significant affordability issues relating to house purchase in all of the parishes. This is most marked within the rural parishes of Broome, Chaddesley Corbett,

Churchill & Blakedown, Kidderminster Foreign, Ribbesford, Rushock and Stone. The analysis shows that rental products are far more accessible to parish residents in terms of their household income.

**8.16** Local housing needs are established through housing needs surveys which are undertaken in agreement and partnership with the relevant Town or Parish Council. It is also established through the Housing Register of persons assessed according to the Council's Allocations Policy as qualifying residents.

**8.17** Rural Exception Sites are sites where general market housing would not normally be acceptable, which provide affordable housing in rural areas. Such sites may only come forward where there is a need for specific housing types as identified through a Parish Housing Need Survey. Where no housing needs survey is available, the District Council will consider need demonstrated by the housing register data.

**8.18** Housing provision on rural exception sites must seek to address the needs of the community by accommodating households who are existing residents or who have an existing family or employment connection to the area in line with the local connections criteria. Proposals for development will need to demonstrate that arrangements are put in place to ensure that the housing will remain permanently available to meet the continuing needs of local people.

**8.19** In circumstances where it is not viable to deliver 100% affordable housing on rural exceptions sites, it may be possible to cross subsidise a scheme with an element of market housing (typically no more than 20%). Under these circumstances, developers will be required to provide additional supporting evidence in the form of an open book development appraisal for the proposed site. The provision of starter homes to meet identified local needs will also be an acceptable form of housing on rural exception sites in addition to other tenure types that meet local housing needs.

**8.20** There can be a need for livestock management, agricultural/agricultural contractors or forestry workers to live on site. Rural workers dwellings will only be permitted where they are considered to be essential and the assessment of this will depend on the needs of the particular enterprise. Where permission is granted for an additional dwelling, then the applicant will be expected to agree to retain the existing accommodation for use within the unit. Convincing evidence should be provided with any application for the removal of an occupancy condition, as set out in Policy 8C.

**8.21** There may be specific circumstances where existing dwellings are in poor repair or no longer appropriate in terms of their design to meet the occupant's needs. In such circumstances, it is considered that it may be appropriate to permit replacement dwellings to meet a specific local need.

### **Policy 8D - Self Build and Custom Housing**

To support prospective self builders on sites of 10 or more dwellings, or sites of an area of 0.5 hectares or more, the developer will need to demonstrate how the need of self builders have been taken into consideration. The developer will fulfill this requirement via agreement

with the Council, taking into consideration demand on the Self Build Register. Sites of more than 50 dwellings will be considered as most suitable for delivering self build dwellings. Self Build and Custom Housing dwellings within the site will be developed in accordance with an agreed design code. Where plots have been made available and marketed appropriately for at least 12 months and have not sold, the plot(s) may be built out by the developer.

The District Council will support planning applications for small scale self build and custom housing, provided they are in keeping with the other policies contained in this Plan.

Overall provision will be reviewed on an annual basis as part of the residential land availability assessment and will be based on the demand as set out in the Custom and Self Build Register maintained by the Council.

The District Council will work closely with Developers, Registered Providers, the Parish Councils, Community Led Housing Groups and Neighbourhood Planning Forums to identify appropriate sites for Self Build and Custom Housing schemes which provide 10 or more services plots. Such schemes will be subject to the following criteria:

- i. The numbers of each different type of Self Build Custom Housing offered in the scheme should reflect the proportion of preference for each type as present in the register.
- ii. Self Build and Custom Housing dwellings within the scheme will be developed in accordance with an agreed design code. The design code will ensure the number, scale, and design of Self Build and Custom Housing should be appropriate to the size and character of the settlement and must not damage the character of the settlement or the surrounding landscape.
- iii. The site should be accessible to local services and facilities and within or adjacent to existing settlements.
- iv. Where plots have been made available they should be reasonably priced to reflect prevailing market values and average local income.

## Reasoned Justification

**8.22** Under the Self Build and Custom House Building Regulations 2016, the District Council is required to have regard to a register of people who are interested in self build or custom build projects in the area. This will help to inform policy development and future plot requirements in the District. There are different types of custom build which will have specific requirements for the types of land plots to be allocated through the Local Plan.

- DIY Custom Build
- Self Finish Custom Build
- Full Turn Key Custom Build
- Independent Community Custom Build
- Supported Community Custom Build
- Co-housing Custom Build
- Affordable Custom Build

**8.23** In April 2018 there was a local demand for 60 Self Build and Custom Plots within the District, with a preference for DIY Custom Build, followed by Self Finish Custom Build and Full Turn Key Custom Build. Of these 40 households expressed interest in a self/custom build plot on a new build development.

### **Policy 8E - Housing for Older People and others with special housing requirements**

The Council will continue to work with providers and developers to meet the additional need for 1,642 C3 dwellings for older people over the lifetime of the plan.

The District Council will also require all major housing development proposals to provide evidence that they have fully considered the provision of the following tenure and type within the overall housing mix on site:

- Bungalows
- Sheltered Housing
- Extra Care Units
- Other types of supported housing

These housing types should include housing for sale and rent and include intermediate forms of provision in line with the Housing Needs Study, Housing Needs Survey (where available) and Housing Register.

We will allocate a minimum provision of 487 Residential Institutional (C2) Units over the Plan Period to be met on sites allocated for housing.

### **Accommodation for Family Members and carers**

The development of annex accommodation will be supported subject to its consistency with all other Local Plan policies and where it meets the following criteria:

- i) Accommodation should be provided by way of an extension which is physically linked to the existing dwelling.
- ii) The dwelling and annex should share vehicular and pedestrian access and the extension should only incorporate a maximum of two bedrooms.

### **Accommodation for families with children**

The needs of families should be met through general developments.

There are a number of homeless households with dependant children whose needs are unlikely to be met through market housing and there will be a requirement to provide a majority of family style housing within the affordable housing mix.

### **Accommodation for people with disabilities**

The District Council will require all major housing development proposals to contribute towards providing 20% of the total housing requirement to meet the higher access standards of Part M Building Regulations (Access to and use of buildings), (Category 2 M4(2), accessible and adaptable dwelling); and a further 1% of the overall number of housing units to meet Category 3 M4(3), wheelchair user dwellings standards.

## Reasoned Justification

**8.24** National Planning Practice Guidance (NPPG) specifies that Local Plans should consider the size, location and quality of dwellings needed within the area to allow older people to live independently and safely in their own home for as long as possible. Future needs should be broken down by tenure and type:

- Sheltered
- Extra Care
- Registered Care Homes
- Residential Institutions (C2 Uses)

**8.25** The Housing Needs Study recognises the number of people aged 65 or over is increasing from 24,000 in 2016 to 31,800 by 2036. Wyre Forest District's population has an old age dependency ratio of 38.6%; this is well above Worcestershire – 34.1%, West Midlands – 28.3% and England – 27.2%. A major strategic challenge for the Local Plan is to ensure a range of affordable housing provision, adaptation and support for the ageing population.

**8.26** During 2010/11 – 2012/13 Core Lettings data showed that 699 older people with support needs were accommodated in the social rented sector within the District. This housing need will need to be met within the overall housing requirements and in addition the Wyre Forest Housing Need Study September 2018 has identified that there is a requirement of 487 C2 units for the plan period.

**8.27** Given the ageing population and the identified levels of disabilities amongst the population it will be essential for some element of the new housing to be built to accessibility standards to meet these needs. It is estimated that 23% of all residents in Wyre Forest have a illness/disability and this is expected to increase to 26% by 2036. It is estimated that there are 450 households requiring wheelchair accessible housing in the district.

**8.28** Financial viability testing has been undertaken and therefore the policy thresholds have been set at 20% of new housing (on sites of 10 or over) meeting M4(2) dwelling standard and 1% meeting M4(3).

**8.29** The provision of annexes or flats as part of an extension to an existing dwelling can be a useful way of meeting the accommodation needs of elderly, sick or disabled relatives or children returning to the parental home. However, it is important to ensure that annexes do not become physically separate dwellings where new dwellings would not normally be permitted.

**8.30** It is expected there will be a further 700 families over the plan period 2016 - 2036.

**8.31** In 2017/18 there were over a 1000 households approaching the Council for housing advice and 150 households owed the full rehousing duty with the majority of these requiring family style housing.

**8.32** There is limited identifiable need for bespoke student housing or for service families in Wyre Forest. Those in serious housing needs could be met through the Housing Register.

### **Policy 8F - Gypsy and Traveller Site Provision**

The following sites, as shown on the Policies Map, will continue to be safeguarded for Gypsy and Traveller use:

- Site A – Lower Heath, Stourport-on-Severn ( 22 pitches)
- Site B – Broach Road, Stourport-on-Severn (9 pitches)
- Site C – Power Station Road, Stourport-on-Severn (4 pitches)
- Site D –1 Broach Meadow, Stourport-on-Severn ( 3 pitches)
- Site E – 1b Broach Road, Stourport-on-Severn (3 pitches)
- Site F – 6/6a Broach Road, Stourport-on-Severn (5 pitches)
- Site G – Meadow Park, Stourport-on-Severn (7 pitches)
- Site H – Saiwen, Stourport-on-Severn (5 pitches)
- Site I – 28/29 Sandy Lane, Stourport-on-Severn (6 pitches)
- Site J – Land adjacent Nunn’s Corner, Stourport-on-Severn (8 pitches)
- Site K – The Gables Yard, Stourport-on-Severn (5 pitches)
- Site L – Gatehouse Caravan Park (16 pitches)
- Site M – Wilden Lane (4 pitches)

The allocations set out in this policy meet the short to medium term needs up to 2020 though after that some additional provision may be required. Sites to meet the longer term needs will come forward through the development management process and will be determined against other policies within this document. Further small scale sites to meet the indicative need of 17 pitches to 2036 will be allocated during the lifetime of the Local Plan. Proposals for Gypsy and Traveller sites are predominantly residential and will be acceptable on previously developed land or in areas allocated primarily for residential development subject to all relevant policies within the Local Plan being met.

## Reasoned Justification

**8.33** Gypsies and Travellers are defined as per the Planning Policy for traveller sites (2015).

**8.34** The 2014 Worcestershire Gypsy and Traveller Accommodation Assessment (GTAA) provides a robust evidence base to determine an appropriate level of pitch and plot provision for the District. The GTAA identified a total indicative need for 29 pitches over the Plan Period. This can be split down into 5 year tranches as follows:

**Table 8.0.4**

	Surplus of 6 pitches (takes account of turnover rates)
2019/20 – 2023/24	6 pitches
2024/25 – 2028/29	10 pitches
2029/30 – 2033/34	13 pitches

**8.35** It should be noted that the later time periods have not had turnover rates applied to them and therefore should be considered as indicative requirements only. Since the GTAA was undertaken, planning permission for an additional 8 pitches on land at Gatehouse Caravan Park has been approved. In addition a further 4 pitches on Firs Yard, Wilden Lane are allocated in this Local Plan, which brings the total requirement during the plan period to 17 pitches.

**8.36** The GTAA indicated a preference for smaller, privately operated sites amongst the travelling community. It will therefore be necessary to identify and allocate suitable sites to meet these needs within the Local Plan Review. The Sandy Lane Area of Stourport-on-Severn has traditionally accommodated the District's provision for Gypsies and Travellers. This is an industrial area which is also home to many local businesses. It is considered that a balance between the uses within this area needs to be maintained and therefore no further sites should be identified for gypsy and traveller provision in this area.

**8.37** Planning Policy for Traveller Sites (PPTS) (2012) states that traveller sites should be preferably located on previously developed land. Development in the open countryside that is away from existing settlements or outside areas identified in the Local Plan should be strictly limited. However, it does recognise that some rural areas may be suitable for gypsy sites and that where this is the case sites should respect the scale of and not dominate the nearest settled community.

**8.38** PPTS states that traveller sites in the Green Belt are inappropriate development – if traveller sites are needed in the Green Belt then they should be allocated through the Local Plan making process. This would mean making an exceptional limited alteration to the Green Belt Boundary to meet a specific identified need for a traveller site.

### Policy 8G - Site Provision for Travelling Showpeople

The land to rear of Zortech Avenue (as shown on Policies Map), is allocated to meet the immediate needs of the existing Travelling Showpeople family currently living within the District. Any proposals brought forward should submit suitable arrangements for sewerage treatment in addition to satisfactory drainage measures. The scale of the site should be to meet the specific housing needs of the existing family.

### Reasoned Justification

**8.39** Whilst the GTAA did not identify a requirement for additional plots for Travelling Showpeople within the District, there is an existing established site through lawful use at Long Bank, Bewdley. Due to the impending displacement of the current occupiers from this site there is now a requirement to formally allocate a site to meet these needs. Therefore there is a specific current need for one family site to be allocated within the District through the Local Plan Review process.

**8.40** Previous site assessments and consultation undertaken to inform the Site Allocations and Policies Local Plan were unsuccessful in securing the allocation of a site for travelling showpeople. Whilst there is evidence to suggest a track record of delivery through the development control process to meet identified Gypsy and Traveller pitch needs, it has proved more difficult to meet the identified need in association with Travelling Showpeople.

**8.41** Further to the provisions as set out in the PPTS, the possibility of making an exceptional limited alteration to the Green Belt Boundary to allocate a site to meet this specific identified need will now be considered through the Local Plan Review. The District Council has consulted on options and has now allocated a site on land to rear of Zortech Avenue (as shown on the Policies Map).

**8.42** Whilst Gypsy and Traveller sites are essentially a residential use, sites for Travelling Showpeople differ in that they need to provide a secure, permanent base which is suitable for storage and maintenance of equipment when it is not in use. Most showpeople need to live alongside their equipment and as such sites need to be suitable for both residential and business use. Sites need to be designed in an appropriate manner which minimises any impacts on neighbouring uses and occupiers. Applicants will be required to demonstrate adequate access for their use and that they have sought a connection to the mains foul sewer in the first instance. Proposals should not have a detrimental impact on nature conservation.

**9.1** Improving the health and wellbeing of Wyre Forest District's residents is a key objective of the Council. It is working closely with partner organisations to tackle health inequalities and ensure the best health outcomes for local people.

**9.2** Health challenges for the district include obesity in children and in adults, mental health, limiting long term illness or disability and increased numbers of people living with dementia. The Wyre Forest currently has a large population of residents over the age of 65 which will increase significantly over the next 20 years. There is a significant link between the health and wellbeing of people living in more affluent areas compared to those living in less affluent areas. Current data shows that males living in the least deprived part of the district can expect to live 8.2 years longer than their counterparts in the most deprived parts of the district. Females can expect to live on average 7.6 years longer. (Wyre Forest Health Profile, Public Health England, 2018)

**9.3** Planning has a very important role to play in addressing these issues. The NPPF contains measures aimed at reducing health inequalities, improving access to healthy food and reducing obesity, encouraging physical activity, improving mental health and wellbeing, securing proposals that meet the needs of all sections of the community and improving air quality to reduce the incidence of respiratory diseases.

### **Policy 9 Health and Wellbeing**

Development should help maximise opportunities to ensure that people in Wyre Forest District lead healthy, active lifestyles and experience a high quality of life by:

1. Encouraging proposals that support innovative and flexible design, including consideration of older people and those living with dementia.
2. Designing easy to maintain, safe and attractive public areas and green spaces, footpaths, bridleways and cycle routes that encourage active travel and social interaction and minimise the potential for crime and anti-social behaviour.
3. Encouraging sport and physical activity through the flexible design and layout of development by embedding Sport England's Principles of Active Design (2015).
4. Providing opportunities for formal and informal physical activity, exercise, recreation and play spaces that support healthy living environments, social cohesion and are designed to serve all sections of the community, including older people and people with disabilities.
5. Improving air quality and reducing pollution through the encouragement of more active lifestyles and reducing car dependency.
6. Providing dwellings that meet the needs of future occupiers, including older people.
7. Providing high quality, energy efficient and affordable housing.
8. Delivering new and improved health services and facilities in locations where they can be easily accessed using public transport, walking and cycling.

9. Encouraging opportunities for access to fresh food, for example through the retention and provision of allotments, community orchards, fruit trees, local markets, and usable private amenity spaces.

10. Health Impact Assessments (HIAs) will be required for developments of:

- Residential and mixed use sites of 100 dwellings or more (Gross)
- Employment sites of 5 ha or more (Gross Internal Area)
- Retail developments of 500 square metres or more (Gross Internal Area)

Where an unacceptable adverse impact on health is established through a Health Impact Assessment process, permission will not be granted.

HIA Screening will be required for proposals for, or changes of use to:

- Residential and mixed use sites 25 to 99 dwellings gross
- Hot food takeaways (see policy 22G)
- Restaurants & cafés
- Drinking establishments
- Betting shops and pay-day loan shops
- Leisure, residential and non-residential institutions

The screening process will identify whether the proposal requires a HIA.

## Reasoned Justification

**9.4** Wyre Forest District Council recognises that spatial planning has an important role to play in the creation of healthy, safe and inclusive communities.

**9.5** The design of the built environment can have a significant impact on both physical and mental wellbeing. The location, density and mix of uses affect how people live their day-to-day lives. How areas and buildings are built and how they are connected through street layout, footpaths, cycleways and open/green spaces can impact on people's health and wellbeing and overall quality of life. It is also vital that community needs are supported through the provision and access to appropriate physical, social and green infrastructure as well as other facilities and services.

**9.6** The Wyre Forest Health Profile (2018) published by Public Health England shows how the health of people in Wyre Forest District compares with the rest of England. Priorities in the Wyre Forest include older people and management of long term health conditions, mental health and wellbeing and obesity. The following table illustrates how the Wyre Forest District compares with Worcestershire and England as a whole for a number of health indicators.

**Table 9.0.1 Key Findings from Health Profile for Wyre Forest District (2018)**

Indicator	Wyre Forest	Worcestershire	England	England worst	England best
GCSEs achieved (5 A*-C inc.Maths & English)	58.8	60.9	57.8	44.8	78.7
Life expectancy at birth (males)	79.6	80	79.5	74.2	83.7
Life expectancy at birth (females)	82.9	83.8	83.1	79.4	86.8
Dementia diagnosis (aged 65+)	61.3	61	67.9	45.1	90.8
Excess weight in adults (aged 18+)	60.3	62	61.3	74.9	40.5
Obese children in Year 6 (aged 10 - 11)	20.0	19.6	20.0	29.2	8.8

**9.7** Increasing physical activity and adopting a healthier lifestyle is essential to reducing obesity in both adults and children. Obesity is a major risk factor for a number of diseases such as Type 2 diabetes, cancer and heart disease. It can also affect people's mental health. Planning has a key role in helping to create places that enable people to achieve and maintain a healthy weight.

**9.8** There are a number of social, behavioural and environmental factors which make it hard for most people to maintain a healthy lifestyle. These factors are often exacerbated in deprived areas where people are 10 times less likely to live in the greenest areas compared with people in the least deprived areas, more likely to live near fast-food outlets which contribute towards the disparity levels of obesity across the population and more likely to feel unsafe in their neighbourhood with consequent negative effects on their health, including a reluctance to take exercise.

**9.9** In areas of high deprivation, it is especially important to encourage healthier lifestyles and easier access to fresh food. One local example is at St.George's Park in Kidderminster where the "Let's Eat the Park" scheme started in 2014. Here there are several raised beds which are now in use funded by the Royal Horticultural Society 'Greening Grey Britain' scheme. Several varieties of fresh fruit and vegetables are raised and grown for and by the local community. This gives a free source of nutritional food to the local community.

**9.10** The Wyre Forest currently has a large population of residents over the age of 65 (24.2%) which is significantly higher than the England average of 17.9%. The built environment can support older people by providing supportive and enabling living environments to compensate for the physical and social changes associated with ageing. For example, the provision of new homes which meet the design standards of Lifetime Homes can enable people to remain independent within their own homes for longer. Whilst dementia can affect people as young as 30, the rate increases significantly with age. People living with dementia frequently stay at home because the outdoor environment feels unsafe and unfamiliar. The provision of dementia-friendly developments including safe, well-lit and walkable routes connecting local green spaces and

essential amenities, seating areas provided in strategic places, simple street furniture and plain, non-reflective and contrasting surfaces could improve the likelihood of those with dementia continuing their everyday lives as part of the community.

**9.11** There are seven key areas where planning can have a positive influence on health. These principles will be further expanded in the Supplementary Planning Document (SPD) on Health and Wellbeing and will form key considerations for the Health Impact Assessment (HIA) and HIA Screening process.

**9.12** HIA is a tool to ensure that a wide range of social, environmental and economic factors that have an impact on human health and wellbeing are considered at the planning and design stage. The HIA process aims to enhance the positive aspects of a proposal through assessment, while avoiding or minimising any negative impacts, with particular emphasis on disadvantaged sections of communities that might be affected. HIA Screening is a simplified process to determine whether HIA is needed for the particular scheme.

### **Key Areas where Planning can have a Positive Influence on Health**

**A** Movement and access - clearly signposted and direct walking and cycling networks serving schools, shops and leisure facilities; safe and accessible public realm; well-designed buildings with passive surveillance; walking prioritised over vehicles; use and monitor travel plans; should promote sustainable transport.

**B** Open spaces, play and recreation - planned network of both blue and green infrastructure; easily accessible natural green space of varying sizes which serves the needs of all groups of the population; safe and easily accessible play areas which are overlooked; sports and leisure facilities designed for use by all including built sports facilities such as swimming pools and sports halls and also encourage access to schools by the community to maximise the value of existing sports provision to the local community.

**C** Food environment - development should maintain or enhance opportunities for food production; avoid over-concentration of hot food takeaways near schools and facilities aimed at young people; food shops / markets should have a diverse range on offer and be easily accessible.

**D** Neighbourhood spaces - community and healthcare facilities should be considered a priority in large developments and be easily accessible. Public spaces should be attractive, multi-use and readily accessible.

**E** Buildings - dwellings should be adaptable and inclusive, catering for the changing needs of the individuals living in them. There should be adequate private and semi-private amenity space and car parking provision as appropriate to the type and size of dwelling.

**F** Local Economy - development should enhance local centres by providing a diverse range of retail; local centres and places of employment should be easily accessible by public transport, walking or cycling; centres should provide benches, toilets and sheltered bike storage.

**G** Environment - Improving air quality and reducing pollution through the encouragement of more active lifestyles and reducing car dependency; avoiding any significant adverse impacts from pollution, noise, light; minimising the impacts from all forms of flood risk.

**9.13** The Food and Drink Retailing Policy (Policy 22G) further expands on the issues around the prevalence of hot-food takeaways and how they can negatively impact on health.

**9.14** It is important that these cross-cutting issues are picked up by policies elsewhere in the Local Plan. Also see adopted Wyre Forest Playing Pitch Strategy and Action Plan and the Indoor and Built Facilities Strategy.

**9.15** Other policies in the Development Plan address issues which could have implications for health and wellbeing and should be considered in conjunction with this policy.

## **A Good Place to do Business**

**10.1** The Local Plan provides the strategic framework for the future prosperity and evolution of the District's economy. The District's economy is vital to the prosperity and quality of life of its residents. Economic growth can increase employment opportunities, improve income and regenerate communities. This section includes policies relating to employment, retail, offices and tourism.

**10.2** Appropriate infrastructure to serve businesses and new development is essential for future prosperity. Suitable access to and from economic areas is crucial to the effectiveness of businesses.

### **Summary of Preferred Options Responses**

Concern raised regarding Kidderminster town centre and empty shop units.

Regeneration of Kidderminster town centre needed with some retail areas used for alternative uses.

Concern regarding the amount of employment land required when units at Easter Park have taken a long time to fill and are not all occupied.

### **Summary of Issues and Options Responses**

Some support for additional employment and housing to bring in migration to help balance the ageing population. More residents to support services and facilities.

New business should be attracted to District for the economic benefits that it will bring but new employment sites should be accessible by public transport.

Concern raised regarding number of empty shops and empty floor space in Kidderminster town centre, support for utilising floor space or replacing them with residential and encouragement for quality shops within the town centre.

Tourism seen as important for the District's economy.

### **Policy 10A - A Diverse Local Economy**

At least 29 hectares of employment land will be brought forward in the plan period up to 2036.

The sites allocated for employment use over the plan period are shown on the Policies Map and are listed in table 10.0.1. These sites are to be safeguarded for economic development. The development of these sites will need to be in line with the site specific policies identified in Part C of this Plan.

- In addition to the sites allocated for employment use, all future employment land should be located in highly accessible locations and be in accordance with the settlement hierarchy in Policy 6B.
- The development of small scale businesses and starter units which are less than 500 sqm, will be encouraged in suitable locations and where they do not conflict with other policy objectives. Live work units will be encouraged where they conform to requirements of Policy 21C.
- Land and premises within the District's existing employment areas will be reserved for B1, B2 and B8 use classes as well as employment generating uses and, where appropriate, sui generis uses.
- Proposals for expansion, updating and intensification of employment uses on existing sites will be supported where they do not compromise the activities of the employment area or conflict with other policy objectives.
- Rural employment sites will be safeguarded for employment uses where appropriate. Proposals for small scale employment of less than 500 sqm in rural areas will be assessed on their merits and should have regard to accessibility by public transport and national policy as well as other Development Plan Policies (such as Policy 21B). The use of previously developed land will be supported where suitable sustainable, accessible opportunities exist.

## Reasoned Justification

**10.3** The strength of the District's economy is vital to the future prosperity and quality of life of its residents. Economic prosperity is a primary objective of Wyre Forest District Council and this has been highlighted by initiatives such as the 'ReWyre Prospectus' and the more recently adopted ReWyre ReNewed Prospectus as well as initiatives such as the Local Development Order for South Kidderminster Enterprise Park.

**10.4** The Government in October 2018 has produced a Local Industrial Strategies policy prospectus and a document 'Working towards a West Midlands Local Industrial Strategy. This is a strategic approach to jointly designing solutions. The strategic overview will help inform LEPs to drive future growth and productivity.

**10.5** A strategic approach to Employment Development is set out within Policy 10A and the quantum of land required to meet the Districts future employment needs has been determined through the production of an Employment Land Review (ELR) 2016 and updated in 2018.

**10.6** The figure of less than 500 sqm used for small scale businesses is a figure that is used for development in The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended.

**10.7** Table 10.0.1 Employment Allocation Sites

Table 10.0.1

Site reference number	Site	Size in hectares
BHS/10	Frank Stone Building	0.32
BHS/11	Green Street depot	0.2
BHS/17	Rock Works	0.36
FPH/8	SDF	4.3
FPH/10	British Sugar Phase 2	2.96
FPH/23	British Sugar Plot D	1.84
FPH/24	Romwire	5
FPH/27	Adj Easter Park	2.53
FPH/28	Hoobrook Site	0.25
FPH/29	VOSA Worcester Road	1.72
LI/12	Former Clubhouse at Golf Course	1.05
MI/3	Parsons Chain	1
MI/18	North of Wilden Industrial Estate	0.22
MI/26	Ratio Park	0.69
MI/33	Wilden Industrial Estate	0.34
MI/34	Oakleaf Finepoint	1
WFR/WC/32	Lea Castle	7
BR/RO/21	Alton Nurseries	1
WFR/ST/9	Cursley DP	0.7
<b>TOTAL SITES</b>		<b>32.48</b>

**10.8** The ELR identified that Wyre Forest has higher levels of economic activity and lower claimant unemployment levels than regional and national averages. Unemployment in Wyre Forest District is 3.4%, the regional figure is 5.0% and nationally 4.3%.

**10.9** However, challenges still remain and the District still suffers from a historic legacy of economic restructuring, relating to the decline of carpet manufacturing in Kidderminster, which is still ongoing. The District also has relatively few high-skilled residents and higher levels of those with no qualifications than comparator areas. Furthermore, the gap between Wyre Forest's resident and workplace wages implies a disconnect between the quality of employment available to commuters travelling out of the District and that available in Wyre Forest District.

**10.10** Given these challenges it is important that a positive economic framework is put in place to help tackle these issues. Having sufficient, readily available and attractive land, of an appropriate type and in the right location, is therefore vital to tackling some of these challenges. The amount and type of employment land identified in Policy 10A will ensure that the District is in a good position to respond and react to the continued diversification of the local economy.

**10.11** A focus of the Wyre Forest District Local Plan is to provide development that supports the area's economic prosperity. The principal mechanisms to achieve this include making provision for:

- The right amount of quality, readily available and type of land for employment uses in locations where business will thrive and be resilient to the challenges of competition and move towards a low-carbon economy.
- To protect and encourage land for employment use, particularly for affordable small/medium spaces, start-up and incubator units and flexible employment space, in order to support the District’s current and future economic and employment needs.
- Facilitate inward investment and support businesses, particularly small and medium sized enterprises and creative industries to grow the employment base of the District.
- Sufficient housing provision that enables more of the labour force to be housed locally and provides the right mix to meet the wide range of housing needs.
- Infrastructure that supports communities, housing, the labour force and facilitates the movement of labour, goods and materials through the alignment of development and supporting infrastructure; this will include provision of facilities supporting training and skills.

**10.12** In addition, it is important that the plan is flexible and responsive to market demands.

**Town Centre Development**

**10.13** Town centres are crucial to the social, economic and environmental wellbeing of the District. The NPPF paragraph 85 states that "planning policies....should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation."

**10.14** The concentration of a range of goods, services and facilities in one area creates a centre for communities and enables people to make one trip for many reasons. The District’s settlement hierarchy of towns is Kidderminster, Stourport-on-Severn and Bewdley, this provides the basis for identifying the locations for new retail, leisure and commercial development. The regeneration of Lionfields forms part of the Council’s ReWyre initiative together with the transformation of the public realm in High Street, Vicar Street, Exchange Street and Oxford Street.

**Policy 10B - Town Centre Development**

- Support will be given to safeguarding, maintaining and enhancing the vitality and viability of the existing retail centres throughout the District.
- New development for retail, commercial and leisure uses should be focussed on the three town centres of Kidderminster, Stourport-on-Severn and Bewdley. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

- Small scale (less than 280 sq m) development of retail uses in rural areas will be supported where appropriate.
- Small scale (less than 500 sq m) development of commercial and leisure uses in rural areas will be supported where appropriate.
- Small scale (less than 280 sq m) development of retail development within towns will be supported subject to proposals being in keeping with the settlement hierarchy and proposals not causing adverse effects on the built, historic and natural environment.
- Small scale (less than 500 sq m) development of office development within towns will be supported subject to proposals being in keeping with the settlement hierarchy and proposals not causing adverse effects on the built, historic and natural environment.
- Proposals for alternative town centre uses outside of the primary shopping areas, such as residential, which can play an important role in ensuring the vitality of centres will be encouraged on appropriate sites if there is no significant adverse impact on the overall vitality and viability of the existing centre.
- Proposals for town centre uses such as recreation, will be supported if there is no significant adverse impact on the overall vitality and viability of the existing town centre.
- Proposals for the reuse of vacant floorspace for town centre uses at ground floor and residential at upper floors and regeneration of the eastern part of Kidderminster town centre to provide a counterbalance to Weavers Wharf will be supported.

### Reasoned Justification

**10.15** The retail sector and town centres are undergoing a period of significant structural change arising not just from the effects of the recent and sustained economic downturn but also the continuing popularity and convenience provided by out-of-town facilities and the increasing adoption of online shopping by both consumers and retailers.

**10.16** The three town centres of Kidderminster, Stourport-on-Severn and Bewdley all have historic buildings within them which add to the quality and attractiveness of the town centres. The Council wish to ensure that the three towns are attractive centres that members of the public want to visit. However, Kidderminster has a number of larger empty shop units and therefore appropriate alternative uses will be encouraged to ensure that the town centres are vibrant.

**10.17** The Retail and Commercial Leisure Needs Study identified that there is no additional capacity for further convenience floorspace in the District and there is no pressing need for the Council to allocate any sites for additional larger food stores. In addition, the Wyre Forest District Retail and Commercial Leisure Needs study identified that:

**10.18** *"Whilst Kidderminster Town Centre does have a theoretical need for additional comparison goods shopping, due to commitments this need only arises toward the end of the plan period. We do not therefore consider any specific site allocations are required now and would suggest instead that there is encouragement given to the reuse of vacant floorspace and regeneration of the eastern part of the town centre to provide a counterbalance to Weavers Wharf." (Paragraph 6.88, Retail and Commercial Leisure Needs Study 2016).*

**10.19** *"Neither Stourport-on-Severn nor Bewdley Town Centres are forecast to have needs for significant levels of comparison shopping floorspace for them to continue to fulfil their existing roles." (Paragraph 6.89, Retail and Commercial Leisure Needs Study 2016).*

**10.20** Given this position, it is not proposed to specifically allocate any sites for future retail needs. However, whilst no sites are required to be allocated to meet need, support will continue to be provided within the identified retail areas of the town's where future development opportunities might arise. Maps showing the Primary Shopping Areas can be found in the Appendix of the Plan. In addition, the Council will continue to support the development and diversification of the three main towns in the District to ensure that their role as strategic Centres are retained and enhanced.

## Sustainable Tourism

**10.21** Wyre Forest District has an attractive and diverse landscape character, which has contributed to growing tourism in the area. Within the District are many visitor and tourist attractions, a number of them are of regional significance such as Severn Valley Railway and West Midland Safari Park. The District has many more "natural" tourist/visitor attractions such as The Wyre Forest itself, Habberley Valley, Local Nature Reserves, Local Wildlife Sites, the River Severn and Stourport Riverside as well as Brinton Park. The District also has Bewdley Museum which attracts 200,000 visitors per annum and the Museum of Carpet in Kidderminster.

**10.22** The following policy seeks to protect and enhance the existing visitor and tourist facilities whilst providing opportunities for new tourist attractions and ensuring that the high quality of the environment is not compromised.

### Policy 10C - Sustainable Tourism

- Support will be given to proposals that improve the quality and diversity of existing visitor/tourist facilities, attractions, accommodation and infrastructure, where development is compatible with the physical character of the area and does not cause any unacceptable impacts.
- Proposals for new tourism related developments will be considered on their merits and determined in line with the policies contained within this Plan.
- Proposals linked to the Tourism Industry should incorporate sustainable transport links as the site should be readily and safely accessible by public transport wherever possible, especially between attractions and Kidderminster town centre. Sustainable transport

links and infrastructure to promote ease of access to the Wyre Forest, Stourport-on-Severn, Bewdley, West Midland Safari Park and Kidderminster Railway Station will be sought.

- Support will be given to developments, projects and initiatives that assist in promoting the waterways as a tourist attraction and proposals that facilitate and encourage heritage tourism.

### **Reasoned Justification**

**10.23** Tourism is an important element within the overall economy of the area. Each year more than 119 million visits are made to the region, generating over £121 million to the local economy and offers employment to more than 2,100. During 2014 2.5 million trips were undertaken to Wyre Forest District comprising 2.3 million day trips and 0.2 million overnight visitors. £64 million was spent by day visitors and £23 million by overnight visitors. The local visitor economy supports 2,138 jobs within the area. It is recognised that the Historic Environment is a strong contributor to the economic benefits of the District resulting from Heritage Tourism.

**10.24** The visitor economy creates new and additional services that can lead to the creation and growth of businesses in the area. Tourism also helps to support the high level of employment that is found in the region.

**10.25** A strong visitor economy can support regeneration projects, additional facilities and services for visitors. This also provides local people with these same facilities that can enrich the life of local communities.

**10.26** The majority of visitors to Wyre Forest District visit on day trips and do not stay overnight. Day trips are important but the short break market needs to be supported and encouraged to expand which would help to secure greater economic benefits for the area as a whole.

## A Unique Place

**11.1** Wyre Forest District Council has an overall vision to protect, improve and enhance the built and natural environment in order to provide an accessible, attractive, enjoyable and healthy place to be. The quality of the District's historic environment is one of its most valuable assets and includes a diverse collection of heritage assets, sensitive habitats and attractive landscapes.

**11.2** The built and natural environment includes everything that surrounds us from open space to historic buildings, rivers and canals and the wider countryside. The environment of Wyre Forest District is made unique by the valleys of the River Severn and River Stour and by the Staffordshire and Worcestershire Canal which all run through the District and help to shape the landscape. A major and distinctive landscape asset is the Wyre Forest itself, comparable to the rivers in terms of both character and significance within planning policy and being the largest contiguous area of Ancient Woodland in England (source: Wyre Forest Landscape Partnership). The District has a number of sites and features which are designated either nationally or locally for conservation interest.

**11.3** A high quality environment can have numerous benefits for an area. Businesses are more likely to locate in areas where the built and natural environment is attractive. The natural, historic, and built environment of the District is also attractive to tourists and can create a strong sense of place, helping to retain residents within the District.

**11.4** Access to high-quality, well-maintained public space is an essential part of promoting active, healthy lifestyles. Well-designed streets can encourage walking and cycling and good access to public space can facilitate participation in sport and active recreation. A comprehensive network of green spaces and corridors will support a range of biodiversity and will help to tackle climate change.

**11.5** This section sets out policies to define quality design and safeguard and enhance the natural and historic environment of Wyre Forest District.

### Summary of Preferred Options Responses

Concern regarding the enlargement of local towns and Kidderminster in particular to accommodate additional housing, impacting on the countryside and local amenity space.

Concern regarding loss of Green Belt and historic landscapes to accommodate new housing whilst brownfield sites remain undeveloped.

Concern relating to the impact on ecology and the environment posed by new house-building on previous undeveloped sites

### Summary of Issues and Options Responses

Within Section 9 Safeguarding Character and Local Distinctiveness paragraph 9.18 offered two options: Option A (specific design guidance for specific locations and specify design criteria for each allocated site); Option B (raising design quality in areas with little or no particular character through innovative and high quality design approaches). There was

individual support for each option with overall more support favouring Option B. <sup>(9)</sup> The role of Neighbourhood Plans and developers' design and access statements in the achievement of high quality locally distinctive design was advocated.

Historic Environment – there was general agreement that the provisions of the National Planning Policy Framework (NPPF) alone do not offer adequate protection to non-designated assets and there is full support for the inclusion of a local distinctiveness policy.

Landscape - there was overall support for protection of the landscape, which may or may not include Green Belt. On balance there is general support for existing chalet and equestrian development policies, but also some backing for small-scale farm diversification schemes to allow some tourist accommodation. Calls for a separate policy covering Trees and Woodlands are addressed within Policy 11D. There was support for the strengthening of Green Infrastructure policy to not only protect assets but enhance them and re-link them into the wider network.

## Design and Local Distinctiveness

Wyre Forest District is a considerably diverse area with particularly distinctive characteristics and heritage assets. It is especially important to aim for quality design in any future development to both complement and enhance this local distinctiveness and create a high quality environment.

### **Policy 11A - Quality Design and Local Distinctiveness**

#### **A. High Quality Design**

All development within Wyre Forest District will be expected to exhibit high quality design. It will need to integrate effectively with its surroundings, in terms of form and function, reinforce local distinctiveness and conserve, and where appropriate, enhance cultural and heritage assets and their settings. New and innovative designs will be encouraged and supported where they enhance the overall quality of the built environment.

9 Issues and Options Consultation September 2015  
<http://www.wyreforestdc.gov.uk/planning-and-buildings/planning-policy/local-plan-review/local-plan-review-issues-and-options.aspx>

## B. Creating and Reinforcing Local Distinctiveness

Wyre Forest District has an existing character that is determined by the qualities of the existing buildings and landscape. New development should respond to these existing qualities and ensure that it represents a positive addition to the streetscape or landscape. Where the existing context is weak or negative, it is important that new development demonstrates an improvement in the quality of the area.

## C. Design Supplementary Planning Document

Proposals for new development must demonstrate a regard for the overarching vision and design objectives, the District's local character and identity and the design processes set out within the latest adopted Design SPD.

## Reasoned Justification

**11.6** High quality design is considered to be essential for sustainable development and it is recognised as a key contributor to community health, economic value, social well-being and inclusion, as well as environmental quality. High quality design is needed to create places where people want to live, work and visit. Design is important everywhere in the District, not only in maintaining places which are attractive, but also in revitalising and regenerating places. High quality design is not just about individual buildings but how places work as well as look.

**11.7** In 2015 the District Council adopted the Design Guidance Supplementary Planning Document <sup>(10)</sup> underlying its commitment to improve the quality of new developments within the area and reflecting the importance attached to design through the NPPF at paragraph 8 and National Planning Practice Guidance. This SPD will be updated following adoption of the Local Plan.

**11.8** It is widely recognised that the process of good design starts with the creation of a well planned structure of streets and spaces which are often the most enduring feature of successful places.<sup>(11)</sup> Effectively connecting new streets and spaces into their surroundings will help to assimilate new developments.

**11.9** The District contains a rich heritage with a range of heritage assets including significant buildings, structures, and archaeology and conservation areas. These include the Staffordshire and Worcestershire canal in addition to a valued network of green infrastructure incorporating important habitats, rivers and streams. This creates an asset-rich environment which will influence the location, design and use of future development and management of the public realm.

10 Design Guidance SPD WFDC, 2015

11 Manual for Streets Paragraph 1.1.2 (Dft & DCLG 2005)

**11.10** Utilising existing qualities including heritage assets will help to strengthen the sense of local identity and community. If successfully incorporated, these elements will also improve the overall legibility of the place with inclusion of recognisable landmarks, spaces and points of enclosure. These strategic policies will help to ensure the creation of successful places that are secure, active, well-connected and attractive places to live and work, with a clear sense of community.

**11.11** Crime and the fear of crime can affect the well-being of the District's communities. Even low levels of anti-social behaviour and fear of crime can have a significant impact on people's lives. In line with the objectives of the NPPF paragraph 91 new development within Wyre Forest District should create safer and accessible environments where crime, disorder and the fear of crime do not undermine quality of life or community cohesion.

**11.12** Policy 11A should be considered alongside Policy 5 (Overarching Sustainable Development Principles) and read in conjunction with Policy 27A (Quality Design and Local Distinctiveness).

## **Historic Environment**

**11.13** The District currently has about 750 designated heritage assets included on the National Heritage List for England, together with 17 Conservation Areas. Undesignated heritage assets include those identified on the Worcestershire Historic Environment Record together with a approximately 1000 included by the District Council on the local heritage list.

**11.14** Historically the River Severn was the principal transportation network, being navigable as far north as Bewdley, and encouraging its development as a market town and point of transfer of merchandise from the Middle Ages onwards. The development of the Staffordshire and Worcestershire Canal in the late 18<sup>th</sup> century resulted in dramatic industrial expansion at Kidderminster, and the creation of the new inland port of Stourport-on-Severn, whilst the fortunes of Bewdley correspondingly declined. The coming of the railways in the mid-19<sup>th</sup> century supported further industrial expansion to the east of the River Severn and improved links both east-west and north-south.

**11.15** The District's villages and hamlets are mostly of medieval or earlier origin. Many of them have surviving medieval assets, such as the parish church, ponds and earthworks. To the east of the River Severn nucleated villages are set within a landscape that is characterised by diverse and important historic field systems, punctuated by small areas of ancient and semi-natural woodlands and remnants of historic parklands. To the west of the River Severn, the farmsteads and settlements are more dispersed and to the north west of the District the Wyre Forest itself remains a dominant feature.

### **Policy 11B - Historic Environment**

- A. Development proposals should protect, conserve and enhance all heritage assets and their settings, including assets of potential archaeological interest, subject to the provisions of Policy 26A (Safeguarding the Historic Environment). Their contribution

to the character of the landscape or townscape should be safeguarded and protected in order to sustain the historic quality, sense of place, environmental quality and economic vibrancy of Wyre Forest District. **In particular this applies to:**

- i. Designated heritage assets; i.e. listed buildings, conservation areas, scheduled monuments, registered parks and gardens and registered battlefields; also non-designated heritage assets (including those identified on the District's Local Heritage List or for which a Historic Environment Record exists), and their settings.
- ii. The historic landscape, including locally distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads, smallholdings and their settings.
- iii. Designed landscapes, including parkland, gardens, cemeteries, churchyards, public parks, urban open spaces and industrial, military or institutional landscapes, and their settings.
- iv. Archaeological remains of all periods.
- v. Historic transportation networks and infrastructure including roads and track-ways, canals, river navigations, railways and their associated industries, and their settings.
- vi. The market town of Bewdley with its historic street and plot patterns, buildings and open spaces along with their settings and views of the town.
- vii. The historic inland port of Stourport-on-Severn with its late-18<sup>th</sup> century street pattern and buildings along with their settings and views of the town.
- viii. The industrial urban landscape of the historic market town of Kidderminster with its surviving heritage assets and their settings.
- ix. The rural villages within the District, including their associated Conservation Areas and buildings, along with their settings and historic views to and from the surrounding countryside.

## Reasoned Justification

**11.16** When considering development proposals Policy 11B should be read in conjunction with Policy 26A Safeguarding the Historic Environment.

**11.17** The historic environment of Wyre Forest is a valuable, finite and irreplaceable resource, which is central to the character and identity of the area. It has a crucial role in supporting sustainable development through enhancing the quality of life of those currently living in and visiting the area and should do so for generations to come as well as delivering wider economic benefits through tourism and uplift in related development benefits.

**11.18** Proposals for development should have regard to the locally distinctive character of Wyre Forest District and appropriate weight will be given to those characteristics identified when determining proposals.

**11.19** Development proposals should protect, conserve and enhance the significance of heritage assets, and the valuable contribution they make to the quality, sense of place, environment, economy and vibrancy of the Wyre Forest District.

**11.20** Heritage assets are a powerful reminder of the work and life of earlier generations. Opportunities will also be pursued to aid the promotion, understanding and appreciation of the historic environment as a means of maximising wider public benefits, and reinforcing a strong sense of place.

**11.21** The benefits of conserving and enhancing heritage assets include:

- a. Potential for sustainable development, reducing carbon emissions by re-using historic structures
- b. Influencing the character of an area and giving it a sense of place
- c. Providing opportunities to be the catalyst for regeneration within an area and inspiring new development and imaginative design

**11.22** Historic Landscape Characterisation studies have been produced for Worcestershire County Council. These provide an evidence base that can be used to inform assessments of local distinctiveness and the heritage value of historic landscapes and their associated heritage assets. The contribution that historic farmsteads make to the landscape is recognised in the guidance produced as a result of the West Midlands Farmsteads and Landscapes Project.

**11.23** Designed landscapes include historic parks at Upper Arley, Ribbesford and Wribbenhall as well as Brinton Park and Kidderminster cemetery. The Policies Map will specifically identify Conservation Areas, Registered Parks and Gardens and Scheduled Monuments. Others are identified in the local heritage lists available to view on the District Council's website and Worcestershire County Council's Historic Environment Records. As well as landscape interest, these heritage assets have significant architectural and archaeological interest and often contain other monuments and memorials.

**11.24** Archaeological remains provide crucial links to the past and can provide useful information about local heritage. In addition to those Scheduled Monuments included on the National Heritage List for England the District has many undesignated sites with archaeological potential – these are often identified on the Worcestershire Historic Environment Record.

**11.25** A green infrastructure-led approach to development could aid the conservation of historic environment features, for example by allowing archaeology to remain in situ or strategically placing green space to preserve the setting of designated heritage assets. Therefore this policy has close links with Policy14 (Strategic Green Infrastructure).

## Landscape Character

### Policy 11C - Landscape Character

#### A. Landscape Character

New development must protect and where possible enhance the unique character of the landscape including individual settlements or hamlets located within it. Opportunities for landscape gain will be sought alongside all new development, in order that landscape character is strengthened and enhanced.

The Worcestershire County Council Landscape Character Assessment Supplementary Guidance (2012 or as later amended) and Historic Landscape Characterisation will be used when determining applications for development within the rural areas.

#### B. Severn Valley Regional Heritage Park

The establishment of a Severn Valley Regional Heritage Park to link the historic towns and landscape from Stourport-on-Severn through to Ironbridge will be supported and promoted during the plan period.

### Reasoned Justification

**11.26** One of the core principles in the NPPF is that planning should recognise the intrinsic character and beauty of the countryside. Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside.

**11.27** Natural England defines landscape character as “*a distinct, recognisable and consistent pattern of elements be it natural (soil, landform) and/or human (for example settlement and development) in the landscape that makes one landscape different from another, rather than better or worse*”.<sup>(12)</sup>

Worcestershire County Council has undertaken a Landscape Character Assessment (LCA) covering the rural areas of the county. The LCA is a tool for identifying those features that give a locality its sense of place, and is used to sub-divide the landscape into areas of similar character, classified as Landscape Types. The LCA Supplementary Guidance is a document designed to inform planning and land management, and is a tool for planners, designers and local communities.<sup>(13)</sup>

**11.28** The LCA and Historic Landscape Characterisation will be used when determining applications for development in rural areas. LCA determines the sensitivity of the landscape which may be used at a strategic level to help guide new development to the most appropriate

<sup>12</sup> <https://www.gov.uk/government/publications/landscape-character-assessments-identify-and-describe-landscape-types>

<sup>13</sup> <http://www.worcestershire.gov.uk/cms/landscape-character-assessment.aspx>

areas. Areas of high landscape sensitivity are those which are least able to accommodate changes without damage to their character and these include the Wyre Forest itself. Less sensitive areas are those which are the most likely to be suitable for future small scale development such as community facilities and rural affordable housing, needed to maintain the viability of the District's villages

**11.29** The landscape of the Severn Valley is particularly distinctive. The River Severn is a cross-boundary feature and the establishment of a linear Severn Valley Heritage Park to celebrate and promote the Severn Valley will be supported through the development of supplementary guidance on its landscape character and the designation of the Severn Valley Railway as a Conservation Area.

## **Biodiversity and Geodiversity**

### **Policy 11D - Protecting and Enhancing Biodiversity**

1. The Council will expect proposed developments to deliver measurable net gains in biodiversity through the promotion and re-creation of priority habitats, ecological networks and the protection and recovery of legally protected and priority species populations. Delivery of measurable net biodiversity gains should be designed to support the delivery of the identified biodiversity network. The level of biodiversity net gain required will be proportionate to the type, scale and impact of development. Enhancements for wildlife within the built environment will be sought where appropriate from all scales of development.
2. Where required proposals for development must be supported by an appropriate level of up to date technical ecological assessment, demonstrating how ecological features identified have influenced the design and layout.
3. In these circumstances development should support the conservation, enhancement and restoration of biodiversity across the Plan Area. Specific provisions are identified below.

Full consideration will be given in making planning decisions to the importance of any affected habitats and features, taking account of the hierarchy of protected sites:

- i. Development which is likely to have an adverse impact on the integrity of a Special Area of Conservation (SAC) (including candidate SACs), Special Protection Area (SPA) (including candidate SPAs), or other international designations or the favourable conservation status of European or nationally protected species or habitat will not be permitted.

- ii. Development likely to have an adverse effect on nationally important sites including a Site of Special Scientific Interest (SSSI) and irreplaceable features including (but not limited to) ancient woodland, and ancient or veteran trees will not be permitted, except where the public benefits of the development at that site clearly outweigh the loss or deterioration of habitat and a suitable compensation strategy exists.
  - iii. Development which would compromise the favourable condition, (or make it less likely that favourable condition can be reached) of a Local Wildlife Site (LWS), a Grassland Inventory Site (GIS), an important individual tree or woodland and species or habitats of principal importance recognised in the Worcestershire Biodiversity Action Plan, or listed under Section 41 of the Natural Environment and Rural Communities Act 2006, will only be permitted if the need for and the public benefits of the proposed development outweigh the loss.
  - iv. The ecological network of wildlife corridors that link the biodiversity areas detailed above, including areas identified for habitat restoration and creation will be protected.
  - v. Where the policy requirements of ii and iii and iv have been met, full compensatory provision, to include establishment (secured through a legal agreement where appropriate) commensurate with the ecological value of the site will be required. In the first instance this should be through on-site mitigation, the details of which should be agreed with the Local Planning Authority. Off-site mitigation will only be acceptable where on-site mitigation is shown not to be possible.
4. The development will secure the management and monitoring of biodiversity of features retained and enhanced within the site or for those features created off-site to compensate for development impacts for a period reasonably related to the lifetime of the development.
  5. Where, having followed the mitigation hierarchy, there is an unavoidable requirement for offsite biodiversity compensation to offset harm, applicants will be expected to demonstrate that this will be brought forward at a scale and proximity to the proposed development in keeping with the harm caused. Where pooled off-setting is required for multiple sites compensation will need to be proportionally supported in scale and kind by the project proposer(s).
  6. Proposals for new housing development should ensure that garden boundaries are permeable to native wildlife (such as small mammals, reptiles and amphibians).

Specific requirements relating to the protection and enhancement of biodiversity and green infrastructure within the District will be set out in a Green Infrastructure Supplementary Planning Document (SPD). Development proposals will be expected to comply with this SPD.

## Reasoned Justification

**11.30** The importance of protecting and enhancing biodiversity occurring outside these designated sites is recognised in European and national law and in the NPPF. In particular, guidance reflects the need to maintain functioning ecological networks at the landscape scale together with irreplaceable habitats and biodiversity features which may not necessarily be covered by a formal designation but which may be highly susceptible to in-combination and cumulative effects such as lighting, noise and disturbance. The Council will therefore expect developments to be informed by an understanding of the site within its local ecological context. This comprises the mappable network of designated and undesignated features and interlinking features within the landscape, including non-designated and non-priority habitats such as road verges, hedgerows and trees outside woodland. The relevant ecological network will draw from readily accessible evidence sources including, but not limited to, the Worcestershire Green Infrastructure Framework, Worcestershire's Biodiversity Delivery Areas, the Worcestershire Habitat Inventory and Worcestershire Biodiversity Action Plan.

**11.31** As well as sites which are protected by designations, there is also the potential through development to create and enhance other sites. These additional areas may be smaller 'stepping stones' forming part of 'wildlife corridors' (both blue and green (see Glossary)) which help to link sites into a more comprehensive and resilient ecological network. This approach is embedded within NPPF paragraphs 170, 171 and 174 which require Local Authorities to create biodiversity or ecological networks.

**11.32** Ancient woodland and veteran trees are an irreplaceable and intrinsic feature of Wyre Forest's ecological network, their importance is recognised within NPPF paragraph 175(c) and a strong commitment for their protection is expressed within DEFRA's 25 year plan. Due to their historical significance, veteran trees are to be considered heritage assets (NPPF Section 16). Natural England guidance on ancient woodland and veteran trees <sup>(14)</sup> states that mitigation measures could include leaving an appropriate buffer zone of semi-natural habitat between the development and the ancient woodland or veteran tree. The actual size of the buffer depends on the type of the development, the type of woodland and what the likely impact would be, but as a minimum it should be at least 15 metres.

**11.33** Where development proposals may affect biodiversity assets, including ancient woodlands, veteran trees and their immediate surroundings, the following principles shall be used to guide the design of development:

- Avoid harm
- Provide unequivocal guidance of need and benefits of proposed development
- Provide biodiversity net gain
- Establish likelihood and type of any impacts

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14 Natural England guidance - Ancient woodland and veteran trees: protecting them from development <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

- Implement appropriate and adequate mitigation and compensation
- Provide adequate buffers
- Provide adequate evidence to support proposals

**11.34** Source: The Planners' Manual for Ancient Woodland and Veteran Trees (Woodland Trust, 2017)

**11.35** Impact assessments and evidence of biodiversity net gain must use the DEFRA biodiversity metric or similar metric subject to the prior written approval of the Local Planning Authority. Mitigation strategies must be informed by an appropriate level of technical study reasonably related to the scale of unmitigated impact anticipated and risks posed. The effectiveness of mitigation and compensation measures is critical in ensuring protection and enhancement of the integrity of biodiversity networks. The Council will expect that wherever possible biodiversity measures in relation to habitats and species will be subject to reasonable monitoring effort related to their scale and complexity.

**11.36** The garden boundaries of new housing developments should be appropriately designed to ensure there is ecological permeability for wildlife species such as hedgehogs, nesting birds, roosting bats, invertebrates etc. This is to ensure the protection and enhancement of existing wildlife corridors and the provision of new connections across the site. This can be achieved in new housing developments by ensuring garden boundaries include at least a 125mm<sup>2</sup> (5 inch<sup>2</sup>) holes/gap in garden fences and walls to allow access for wildlife, such as hedgehogs, frogs and toads. The use of hedgehog shelters, nesting boxes and bug hotels (e.g. installed on buildings and fence posts), to provide food and nesting opportunities is encouraged. Developers will be required to provide an information/welcome pack to new residents regarding the importance of maintaining wildlife corridors.

**11.37** The District Council will seek to progress a Green Infrastructure Supplementary Planning Document (SPD) in order to provide a holistic approach to the provision of green infrastructure and to maximise the many benefits that green infrastructure brings. The SPD will set out specific requirements for the protection and enhancement of biodiversity and green infrastructure within the District up to 2036.

**11.38** Wyre Forest District has a range of nationally and locally important sites. The NPPF provides the context for conserving biodiversity and this Local Plan protects the relevant designated sites through identifying them on the Policies Map. The designated sites are also set out in the table below. It should be noted that there are no sites within the District which are designated as being of international importance. Additional sites may be designated during the lifetime of the Local Plan.

**Table .1 Important sites for Biodiversity**

Designation	Sites
<b>Areas of National Importance:</b>	<ul style="list-style-type: none"> <li>• <b>Chaddesley Woods NNR and Feckenham Forest SSSI</b> - A large semi-natural ancient woodland and species-rich unimproved grassland.</li> </ul>

Designation	Sites
<ul style="list-style-type: none"> <li>• Sites of Special Scientific Interest (SSSI)</li> <li>• National Nature Reserves (NNRs)</li> <li>• Other Areas of National Importance</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Wyre Forest SSSI and NNR</b> - One of the largest and most important ancient woodlands in England, including woodland, scrub, springline flushes, streams, grassland and orchards; and incorporating several outlying areas.</li> <li>• <b>Areley Wood SSSI</b> - A large ancient semi-natural woodland.</li> <li>• <b>Devil's Spittleful, Rifle Range, and Hartlebury Common SSSIs</b> -The County's most important lowland heaths, which are a nationally and internationally scarce habitat.</li> <li>• <b>Hurcott and Podmore Pools SSSI</b> - The County's largest alder woodland.</li> <li>• <b>Kinver Edge SSSI</b> - Woodland and heathland.</li> <li>• <b>Puxton Marshes, Stourvale Marshes, and Wilden Marsh and Meadows SSSIs</b> - The County's most important marshlands, adjoining the River Stour.</li> <li>• <b>Bliss Gate Pastures, Browns Close Meadow, Buckridge Meadow and Showground Meadow SSSIs</b> - Meadows.</li> <li>• <b>Ranters Bank Pastures SSSI</b> - Grassland and traditional orchard.</li> <li>• <b>Eymore Cutting and River Stour Flood Plan SSSIs</b> - Sites of geological interest.</li> <li>• <b>Dumbleton Dingle SSSI</b> - Broadleaved, mixed and yew woodland - lowland.</li> </ul>
<p><b>Areas of Regional, County or Local Importance</b></p>	<p><b><u>Local Nature Reserves:</u></b></p> <ul style="list-style-type: none"> <li>• <b>Burlish Top</b> (between Kidderminster and Stourport-on-Severn) &amp; <b>Habberley Valley</b> (to the Northwest of Kidderminster) - Part of the County's most important complex of lowland heaths, which is a nationally and internationally sacred habitat. Habberley Valley also includes woodland and acid grassland.</li> <li>• <b>Blake Marsh, Spennells Valley and Redstone</b> (Kidderminster and Stourport-on-Severn) - Marshlands.</li> <li>• <b>Hurcott Woods</b> (Kidderminster)</li> <li>• <b>Vicarage Farm Heath/Whittall Drive West</b> (Birchen Coppice Estate, Kidderminster)</li> <li>• <b>Half Crown Wood</b> (Walshes Estate, Stourport-on-Severn)</li> <li>• <b>Moorhall Marsh</b> (Stourport-on-Severn riverside)</li> <li>• <b>Kingsford Forest Park</b> - Wolverley</li> <li>• <b>Hartlebury Common</b> - Stourport-on-Severn (immediately adjacent to district boundary)</li> </ul>
	<p><b><u>Other Potential LNRs:</u></b></p> <ul style="list-style-type: none"> <li>• <b>Blakedown Valley</b> (Blakedown)</li> <li>• <b>Hoobrook Valley</b> (Kidderminster)</li> <li>• <b>Mitton Marsh</b> (Timber Lane/River Stour, Stourport-on-Severn)</li> </ul>
	<p><b><u>Other Nature Reserves:</u></b></p> <p><b>Worcestershire Wildlife Trust:</b></p>

Designation	Sites
	<ul style="list-style-type: none"> <li>● Betts Reserve (Far Forest)</li> <li>● Bishops Meadow (Wolverley)</li> <li>● Devil's Spittleful (Kidderminster fringe)</li> <li>● Knowle's Coppice (the Wyre Forest)</li> <li>● Wilden Marsh (Stourport-on-Severn)</li> </ul> <p><b>Woodland Trust:</b></p> <ul style="list-style-type: none"> <li>● Verflores Wood (Pound Green)</li> <li>● Wassell Wood (Kidderminster Foreign)</li> </ul> <p><b>Forest Enterprise:</b></p> <ul style="list-style-type: none"> <li>● Wyre Forest Nature Reserve (the Wyre Forest)</li> </ul> <p><b>Important Arboreta:</b></p> <ul style="list-style-type: none"> <li>● Arley House (Upper Arley) - Registered Park and Garden</li> <li>● Bodenham (Wolverley)</li> </ul>
	<p><b><u>Local Wildlife Sites:</u></b></p> <p>A network of 58 sites throughout the District that includes the Rivers Severn and Stour and a number of brooks, streams and pools as well as Ribbesford woods and Arley Wood and Eymore Wood.</p>

**Geodiversity**

**Policy 11E - Protecting and Enhancing Geodiversity**

1. New development must strive to enhance and not have a detrimental impact on the geodiversity of the District.
2. Where relevant, development proposals should:
  - i. make a positive contribution to the protection and enhancement of geodiversity;
  - ii. identify, maintain and appropriately manage geodiversity assets;
  - iii. actively contribute to the implementation of Geodiversity Action Plans (GAPs) at the national, regional or local level.

**Reasoned Justification**

**11.39** Geodiversity is a fundamental cornerstone of our everyday lives. Geology affects where we build, how we construct buildings and how we deliver associated services. It influences the design and layout of infrastructure, filters our drinking water and underpins the landscape around us. Geodiversity cannot be replaced or recreated (other than on geological timescales).

**11.40** Geodiversity may be defined as the range of rocks, fossils, minerals, landforms and soils that occur on our planet along with the natural processes that shape the landscape. The geodiversity of the District plays a major role in influencing and supporting its biodiversity.

**11.41** National planning policy is clear that Local Planning Authorities should protect and enhance geodiversity. Geodiversity sites with existing or proposed European or national designations are Sites of Special Scientific Importance and subject to statutory protection. The Council will protect and enhance geodiversity designations within the District and will continue to work with the local Geodiversity Partnership to promote geodiversity. Geodiversity designations are shown on the Policies Map and are set out in the table below. Additional sites may be designated during the lifetime of the Local Plan.

**Table .2 Geodiversity Designations**

Type	Details
Local Geological Sites	<ul style="list-style-type: none"> <li>● <b>Bark Hill (Bewdley)</b> - Eturia Marl Formation and Upper Coal Measures.</li> <li>● <b>Bewdley Road cutting (Wribbenhall)</b> - Bridgnorth Sandstone Formation.</li> <li>● <b>Bewdley Road cutting (Kidderminster)</b> - Kidderminster Formation.</li> <li>● <b>Blackstone Rock</b> - River cliffs, Bridgnorth Sandstone and Kidderminster Formations.</li> <li>● <b>Hartlebury Common</b> - Quaternary late glacial and post-glacial wind blown sand.</li> <li>● <b>Hextons Farm Quarry</b> - Upper Carboniferous, Salop Formation - Alveley member.</li> <li>● <b>Worcester Road (Hoobrook)</b> - Wildmoor Sandstone Formation.</li> <li>● <b>Eymore Railway Cutting</b> - Carboniferous, Westphalian Formation.</li> </ul>

Type	Details
	<ul style="list-style-type: none"> <li>● <b>Redstone Rock</b> - Triassic, Sherwood and Sandstone Group, Wildmoor Sandstone Formation.</li> <li>● <b>Leapgate Old Railway Line and Quarry</b> (Country Park).</li> </ul>
<p>Additionally, the Council considered that areas of at least local geological or geomorphological importance exist at various locations, including the following:</p>	<ul style="list-style-type: none"> <li>● <b>Arley Station railway cutting</b> - Upper coal measures.</li> <li>● <b>Habberley Valley</b> - Permo-Triassic Sandstones.</li> <li>● <b>Vales Rock (Kingsford)</b> - Permo-Triassic Sandstones.</li> <li>● <b>Wilden Lane</b> - river terraces and gravel deposits.</li> </ul>

**11.42** Geodiversity sites should also be recognised for their importance in providing habitats for biodiversity and in allowing delivery of ecosystem services.

**11.43** Where appropriate, access for all should be provided to geodiversity sites, although it is recognised that this is not always desirable. Geological sites will require appropriate maintenance regimes to ensure that these assets are properly protected and managed.

**11.44** The local Geodiversity Partnership will identify, map and regularly review the priorities for protection and improvement throughout Worcestershire County. These will be used to inform planning decisions. See Herefordshire & Worcestershire Earth Heritage Trust for further details: <http://www.earthheritagetrust.org/pub/>

## Regenerating the Waterways

### Policy 11F - Regenerating the Waterways

#### A. Rivers

All proposals for development in or adjacent to the District's rivers and/or within an area at risk of flooding must also conform with Policy 15C. Rivers are to be enhanced in accordance with Green Infrastructure, Biodiversity and Water Management Policies.

Development which opens up views and enhances the landscape and biodiversity of the River Stour in Kidderminster and Stourport-on-Severn will be encouraged.

Development which preserves and enhances the historic riverside character of the Bewdley Conservation Area will be encouraged.

Development proposals which preserve and enhance the character of the Stourport No.1 Conservation Area adjacent to the River Severn will be encouraged.

**B. Staffordshire and Worcestershire Canal**

Developments and initiatives that make a positive contribution to the creation of an attractive and high quality canal-side environment will be supported.

**Reasoned Justification**

**11.45** Two of the District's three main waterways (the River Stour and the Staffordshire and Worcestershire Canal) pass through Kidderminster and Stourport-on-Severn, whilst the principal river, the Severn, passes through both Stourport-on-Severn and Bewdley.

The canal and rivers are prominent features of the District and, as well as helping to shape the area's past, these key distinctive assets have great potential to act as catalysts for local regeneration, bringing benefits and influencing the future development of the District.

Proposals for development within or adjacent to the Staffordshire and Worcestershire Canal Conservation Area should accord with the most up-to-date Conservation Area Character Appraisal and Management Plan.

This Policy is to be read in conjunction with Policies 15C and 27E (Wyre Forest Waterways).

**12.1** This policy has been drawn up to take account of a significant number of comments made during the Issues & Options consultation stage in autumn 2015 and the Preferred Options consultation in summer 2017.

**12.2** The assessment of infrastructure requirements set out in this Pre-Submission publication has been carried out by the Council in close consultation with infrastructure providers, including the County Council. Worcestershire LEP and the Greater Birmingham and Solihull LEP have also been consulted to secure maximum alignment on the priorities for infrastructure in Wyre Forest. The partner authorities intend to explore a range of funding mechanisms to finance the infrastructure requirements of Wyre Forest.

**12.3** The Council will consider wider infrastructure funding streams as part of the Local Plan Review process and in due course will consider the introduction of a Community Infrastructure Levy in conjunction with the latest Planning Obligations SPD, as adopted by the Council in September 2016.

### **Policy 12 - Strategic Infrastructure**

- A. The Council will work closely with its partners, especially the County Council, to bring forward the appropriate, proportionate and necessary infrastructure that is required to deliver the Plan.
- B. Development will be required to provide or contribute, financially or in kind, towards the provision of infrastructure needed to support it, subject to viability requirements designated by the NPPF.
- C. Where new infrastructure is needed to support new development, the infrastructure must be operational no later than the appropriate phase of development for which it is needed.

### **12.4 Reasoned Justification**

**12.5** Cross reference should be made to Policy 13 Transport and Accessibility.

**12.6** In the previous Wyre Forest Core Strategy and the subsequent Development Plan Documents, much of the development was in the urban areas with a focus on brownfield sites. In this Local Plan Review, a different pattern of development is required with more sustainable urban extensions on greenfield sites and this is reflected in the consequent infrastructure requirements. New development requires suitable infrastructure to integrate it with existing communities and meet the needs of new residents and businesses.

**12.7** The infrastructure requirements to support the Plan are set out in the Wyre Forest Infrastructure Delivery Plan (WFIDP) that was prepared in spring 2017, updated in summer 2018 and which will be updated regularly throughout the lifetime of the Plan.

**12.8** The Council and its partners are committed to the delivery of infrastructure, as set out in the WFIDP. The WFIDP specifies the requirements for physical infrastructure (including transport and utilities), social infrastructure (including education, health), and green infrastructure.

The WFIDP also contains a spatial description of the infrastructure requirements. The WFIDP is intended to be a “living document” and will be updated as necessary to support the delivery of this Plan.

**12.9** For the specific infrastructure requirements related to particular sites, reference should be made to the site specific policies contained in Part C of this Plan, where appropriate. For those allocated sites where this Plan does not contain detailed policy guidance on infrastructure provision, a specific assessment of infrastructure requirements will be developed by the Council in conjunction with infrastructure providers and in liaison with developers when development proposals come forward. Reference should be made to the most current version of the WFIDP, which will provide assistance in identifying infrastructure requirements for these sites.

## Policy 13 - Transport and Accessibility in Wyre Forest

### Managing Travel Demand

- A. Proposals must demonstrate that:
- i. the location and layout of development will minimise the demand for travel;
  - ii. they offer viable sustainable transport choices, with a particular focus on active travel modes (walking and cycling);
  - iii. they address road safety issues; and in particular,
  - iv. they are consistent with the delivery of the Worcestershire Local Transport Plan objectives.
- B. Travel Plans will be required for all major developments. These must set out measures to reduce demand to travel by private cars and must seek to promote and support increased walking, cycling and public transport use for a range of trip purposes through agreed targets and monitoring arrangements. The Travel Plan must follow the guidance set out in the National Planning Policy Framework.
- C. New development should have regard to the principles and design criteria set out in Manual for Streets 1 and 2, the Worcestershire Local Transport Plan compendium and the Worcestershire Streetscape Design Guide.

### Providing Alternative Modes of Travel

- D. Priority will be given to improving infrastructure, technology and services to support active travel (walking and cycling) and passenger transport (bus, rail and community transport) during the plan period. In accordance with Policy 12 on Strategic Infrastructure, development will be expected to contribute to the provision of sustainable transport infrastructure, technology and services necessary to support that development, either through direct investment or by financial contributions.
- E. In order to promote greater transport choice in rural areas, community transport and innovative transport projects, including those that promote the use of new vehicle technology, will be encouraged in conjunction with new development proposals.

### Delivering Transport Infrastructure to Support Economic Prosperity

- F. The following transport schemes, as identified within the Worcestershire Local Transport Plan, are the most significant for the successful implementation of the WFLPR:
- WFST 1: Kidderminster Transport Strategy Major Scheme.
  - WFST 2; Transport Telematics Investment Package (all towns).
  - WFST 3: Active Travel Corridor: Bewdley to Wyre Forest (Dowles Link).
  - WFST 4: Mustow Green Junction Enhancement Scheme.
  - WFST 5: Blakedown Rail Station Enhancement Scheme.

- The schemes listed in the Kidderminster, Stourport-on-Severn and Bewdley Packages.
- SWAT 10: Stourport to Hartlebury Station (Leapgate Line) Active Transport Corridor.
- In addition schemes will require implementation to support the level of development proposed in the Local Plan.

G. Development proposals will not be permitted if they are likely to prejudice the implementation of the transport schemes set out in clause F, the implementation of identified highway improvements or traffic management schemes, or the operation of existing or proposed public transport facilities.

H. The following sites and corridors will be safeguarded from development that would prejudice future enhancement of the rail network and strategic access to it:

- Worcester-Kidderminster- Stourbridge junction – Birmingham Snow Hill line.
- Severn Valley Rail Line.
- Leapgate Lane former rail alignment (Stourport to Hartlebury).

**Transport Assessment Strategy**

I. Transport assessments are required for all major developments and must be carried out in compliance with relevant national and local policies and guidance, including the Worcestershire Local Transport Plan compendium.

**Freight Proposals**

J. Any industrial or commercial development that is likely to generate freight movements of more than 10 vehicular trips per day will be required to carry out an assessment of its impact on the local road network and environment and the suitability to accommodate the increased traffic. Wherever possible, such development should be located on or near the principal road network.

**Implementation**

K. Financial contributions from development towards transport infrastructure will be secured through developer contributions subject to viability requirements designated by the NPPF and, if appropriate, the Community Infrastructure Levy Charging Schedule.

**Reasoned Justification**

**13.1** The Wyre Forest Local Plan Review recognises that the quality of transport provision and the accessibility of the District greatly affect regeneration, economic diversification and growth, and the quality of life of its residents and visitors. Traffic congestion, in particular, is a major cost to the local economy, has the potential to constrain future growth, and is a major cause of environmental pollution, including deteriorated air quality and ambient noise, especially within the urban areas.

**13.2** There are two Air Quality Management Areas in the Wyre Forest District: one at Welch Gate in Bewdley Town Centre and one at Horsefair/Coventry Street and the adjacent section of Kidderminster Ring Road. Both locations are particularly challenging to mitigate; the former because of historic, dense street patterns and the latter because of traffic volumes. In residents' surveys, concerns regarding traffic congestion as well as the quality of roads and pavements, sit second only to crime concerns in relation to satisfaction with living in the District.

**13.3** Sites on the highway network such as the A449 Worcester Road, the A451 Kidderminster Ring Road and its approaches, and the A448 between Kidderminster and Bromsgrove suffer from significant congestion during peak times; the A456 near the West Midlands Safari Park suffers from high levels of traffic in the summer months, when visitor numbers are highest. Furthermore, the Kidderminster Ring Road creates a barrier and 'collar' effect which deters pedestrian and cycle journeys to and from the town centre, including links to Kidderminster Railway Station/SVR on Comberton Hill.

**13.4** Constrained by its single river crossing, highway network and the location of the main car parks to the west of the town centre, high levels of traffic are channelled through the historic centre of Stourport-on-Severn. These high traffic levels have resulted in borderline Air Quality Management Areas and have a detrimental impact on regeneration proposals. Bewdley town centre is also constrained by its single river crossing and narrow historic street pattern, which results in localised congestion and reduced dispersal of vehicular emissions. This has resulted in deterioration in ambient air quality in Bewdley Town Centre and the designation of the Air Quality Management Area in Welch Gate.

**13.5** If traffic growth trends continue with a reliance on the private car, many more of the District's main urban and interurban arterial routes will become increasingly impassable due to congestion beyond traditional peak times. Further growth in the District, especially as part of the regeneration of key employment and town centre sites such as the Churchfields development (Kidderminster), has the potential to exacerbate traffic congestion unless delivered in conjunction with investment in transport infrastructure, technology and services. In addition to private cars, the poor performance of the highway network in the form of congestion has significant impacts on the passenger transport network (including bus/rail integration), freight and small delivery movements, taxis/private hire journeys and trips taken by pedestrians and cyclists.

**13.6** To tackle traffic congestion, significant changes in travel patterns and travel behaviour are necessary on a local neighbourhood and District wide level. This will require investment in transport infrastructure and services, and the adoption of policies that ensure the closer integration of land use and transportation planning, to help manage demand on the local transport network. Specifically, a strong focus is required on reducing the need to travel and encouraging use of other modes of transport (travel choices), especially for shorter trips, to improve accessibility and tackle traffic congestion. Nationally and at the local level, evidence and experience consistently proves that even small shifts away from single-occupancy car use to walking, cycling and passenger transport can deliver significant improvements to access to key services and facilities.

**13.7** The recent completion of the Hoobrook Link Road (opened Sept 2016) has helped to ease delays along the A451 Stourport Road corridor and brought significant economic benefits to the area; however, traffic congestion cannot just be tackled by building new roads, as this

approach is unaffordable and unrealistic. Investment in transport infrastructure, technology and services across all modes of transport will be required to accommodate the growth in travel demand without increasing travel times, congestion and the associated costs that can undermine economic performance.

**13.8** Traffic congestion is a significant challenge for freight movements and networks, and businesses rely on this network for access to raw materials and delivery of finished products. Reducing delays on the highway network to promote consistently reliable journey times is especially important for road freight operations and to promote economic growth. Tackling 'pinch points' in the network is very important to the freight sector, as is investment in Intelligent Transport Systems (ITS). At the hub of ITS is Urban Traffic Management Control (UTMC), which provides the facility to integrate a wide variety of information on highway network conditions from numerous sources/systems to support network management and provide comprehensive travel information across a wide range of communication channels.

**13.9** In addition to road based freight, future proposals for employment development, particularly along the Stourport Road Employment Corridor, should have regard to the possibility of utilising the existing rail infrastructure for the sustainable movement of freight.

**13.10** To promote further development, economic growth and tackle traffic congestion, the Wyre Forest District will need to have:

- High-quality active travel routes and corridors (walking and cycling) to provide an attractive, direct travel choice for shorter distance journeys, particularly in urban areas;
- Excellent access to rail stations and improved rail services;
- A convenient and efficient urban passenger transport network;
- An efficient highway network with good links to the strategic highway network, to enable the efficient movement of goods and services essential to support economic activity and growth.

### **Highway Network**

**13.11** The District does not benefit from local access to the motorway network (M5); however, it has connections to the Black Country and wider West Midlands Conurbation to the north/west, Bromsgrove and Redditch to the east, and Worcester to the south, provided by the local principal road network.

**13.12** The main highway corridors are:

- A442 - runs north/south through the District and Kidderminster town centre linking Droitwich and Bridgnorth;
- A448 - runs Kidderminster- Bromsgrove-Redditch;
- A449 - runs north/south through the District and the eastern side of Kidderminster town centre, linking Worcester and Wolverhampton;
- A450 – runs in the south of the District linking Stourbridge and Hagley to Torton, near Hartlebury;

- A451 - runs north/south through the District and Kidderminster town centre (incorporating the Kidderminster Ring Road) linking Stourport-on-Severn and Stourbridge;
- A456 - runs east/west through the District providing the main route from the West Midlands conurbation to Kidderminster, Bewdley and on to the Marches.

**13.13** There are significant challenges with traffic congestion in Kidderminster and Stourport town centres in particular and intervention is needed to support regeneration, economic diversification and growth. This will require new active travel links and potentially the construction of some new sections of highway and alterations and improvements to existing roads and junctions, if these can be justified. In particular, focus is needed to enhance the performance of 'pinch-points' on the existing transport network where journey times and costs are increasing. The recent opening of the Hoobrook Link Road has released capacity on the A451 Stourport Road corridor which may offer opportunities for infrastructure enhancements to benefit buses, pedestrians and cyclists.

**13.14** There are a number of 'pinch points' on the inter-urban highway network such as the junction of the A448 and A450 at Mustow Green, where significant investment is required to improve the efficiency of the junction to cater for existing, and the forecast increase, in traffic demand. Development in intelligent transport systems (telematics), such as Variable Message Signs and Real Time Information Systems, will increasingly have a role in managing demand on the highway network and investment will be required to develop and maintain these systems so that the network functions more efficiently.

## Rail Network

**13.15** There are two rail stations within the District, Kidderminster and Blakedown, both providing important links with the West Midlands conurbation and Worcester; there are also direct trains from Kidderminster to London (Marylebone) via Birmingham Snow Hill. Whilst having a good service to Birmingham and Worcester, Kidderminster's connectivity southwards from Worcester depends upon the 2-hourly frequency Great Malvern-Bristol service and connectivity at Cheltenham Spa, with the result that it is often quicker and faster to travel to destinations south of Worcester via Birmingham City Centre. Northbound journeys from Kidderminster require a change either between Birmingham Snow Hill/Moor Street and Birmingham New Street or at Smethwick Galton Bridge.

**13.16** Kidderminster Rail Station is the second busiest in Worcestershire, representing nearly 20% of all rail travel in the County, dominated by commuter flows into Birmingham. The service provides valuable links for employment, retail, leisure and education, and is well used in both directions, with the highest demand during weekday peak periods. It is recognised however, that the facilities at Kidderminster Rail Station need to be improved and investment is necessary for enhancements to cater for the expected doubling of passenger numbers by 2043.

**13.17** The Worcestershire Local Enterprise Partnership (WLEP) Strategic Economic Plan (SEP) highlights a number of challenges facing the County and notes that "there is considerable scope to enhance Worcestershire's rail infrastructure and services". In the SEP there is clear commitment to support the Kidderminster Rail Station Enhancement scheme as a short-term 'Local Growth Fund' initiative, to actively improve accessibility to and from the County by rail, and reduce reliance on private car travel.

**13.18** The proposed enhancements include a new station building and improved access for all modes that provides a high quality transport gateway to Kidderminster and the Wyre Forest that is better integrated with the Severn Valley Railway (SVR) and other key business and tourist destinations. To maximise the benefits of the Rail Station enhancements, it is vital that investment go toward measures to enhance rail integration and active mode improvements; in particular, toward improved walking and cycling links into and through Kidderminster town centre and surrounding residential areas. This recognises that increased demand to travel cannot be met by the car alone; travel choice is essential to support sustainable growth of rail patronage in the longer term.

**13.19** To complement the planned enhancements to Kidderminster Rail Station and rail connectivity for the District, the emerging Worcestershire County Council Rail Investment Strategy includes evidenced aspirations for the following rail access improvements:

- Extending London Paddington-Worcester services to Droitwich Spa and Kidderminster;
- Provision of a new direct train service between Kidderminster, Worcester, Cheltenham Spa, Gloucester, Bristol Parkway and Bristol Temple Meads.

**13.20** The emerging Rail Investment Strategy also highlights the need to address poor journey times between Kidderminster and Birmingham, where the average travelling speed is just 33mph.

**13.21** Although patronage is relatively low at Blakedown Station, it is recognised that investment is required to cater for the significant forecast growth in rail travel with enhancements required to include:

- Improvements to passenger information and station facilities for passengers;
- Improvements to walking/cycling routes to the station;
- Improvements to access arrangements for cyclists and provide additional new cycle storage facilities;
- Set-down and pick-up facilities for taxi users and operators;
- Improve facilities for passengers with disabilities;
- Provision of suitably sized station car park.

**13.22** The opportunities to increase car parking provision at Kidderminster Rail Station are limited and so improving parking provision at the alternative stations (Blakedown and Hartlebury) will be essential to support anticipated rail growth in the Wyre Forest.

**13.23** The South Worcestershire Transport Strategy (covering the City of Worcester, Wychavon and Malvern Hills Districts) includes aspirations to enhance facilities and services at Hartlebury Station which will offer increased travel and economic growth opportunities for Wyre Forest District, particularly for residents and businesses in Hartlebury and Stourport-on-Severn. The proposals, similar in scope to those for Blakedown Station, suggest enhancements to facilities to cater for the forecast growth in rail travel. The Worcestershire County Council LTP4 includes proposals for the promotion of 'Active Travel Corridors' and a strategic corridor identified is the Stourport to Hartlebury Station (Leapgate Line) Active Travel Corridor. This Active Travel Corridor aims to focus investment in walking and cycling links along the corridor to create a comprehensive, integrated off-road network linking residential areas with key trip attractors, including rail stations.

**13.24** The Severn Valley Railway (SVR) is one of the leading heritage railways in the UK, operating over a 16 mile route between Kidderminster and Bewdley to Bridgnorth in Shropshire. The railway is one of the major tourist attractions in Worcestershire with over 200,000 visitors annually. There is potential for connections to the National Rail network at Kidderminster Rail Station to enhance services to/from Bewdley. This would, however, require significant investment and support from the Department of Transport (DfT) before this could be realised.

**13.25** As part of the 70 acre 'Silverwoods' development on the former British Sugar site (A451 Stourport Road), now accessed via the new Hoobrook Link Road, works are on-going for a mixed used development including 250 homes. The outline planning consent for 'Silverwoods' includes provision for a new rail halt on the nearby SVR line to connect to the SVR and National Rail services. The viability of such a scheme will require further investigation before it is considered feasible.

**13.26** The West Midlands Safari Park, located near the SVR line has ambitious plans for an indoor water park, 1,000-delegate conference and exhibition centre and 250-bedroom hotel; also included are aspirations for a railway station on the SVR with connections on to the National Rail network at Kidderminster. The Park is keen that the arrival of HS2 in Birmingham in 2026 may support further visitor volume growth.

**13.27** Located near Norton in Wychavon District, the Worcestershire Parkway Major Scheme involves the development of a new parkway station at the intersection of the Bristol to Birmingham and the Hereford – Worcester- London main line railways; the station is due for completion during 2018. The poor quality rail service between Kidderminster and locations served by the Birmingham - Cheltenham - Gloucester - Bristol and Cardiff main lines is exacerbated by the lack of direct access to cross-country services. Worcestershire Parkway aims to address this issue and improve access to national rail services. Parkway's location close to Junction 7 of the M5 will make it a strategic access point for the rail network for much of the County. It will have 500 car parking spaces and services to Parkway will initially include:

- Hourly GWR Worcester – London Paddington services;
- Hourly Cross Country Cardiff – Nottingham services.

**13.28** The Worcestershire Parkway Station is likely to offer increased opportunities for Kidderminster, Blakedown and Hartlebury Stations in the future, including enhanced links to regional and national economic hubs in London and the South East, the South West and South Wales.

**Road-Based Passenger Transport Networks (Bus, Taxi and Community Transport)**

**13.29** The provision of a high quality road-based passenger transport network is critically important for the social and economic wellbeing of the District, providing essential access to a range of health, employment, leisure, education and retail opportunities and services, as well as rail hubs which provide access to a far greater range of destinations. Road-based passenger transport plays a significant role in tackling social inequality and, where subject to investment, can significantly reduce congestion and promote healthier lifestyles. The bus network in the Wyre Forest District is predominantly provided by a single operator, and has been subject to consistent underfunding for a number of years. The network suffers from poor service reliability

and punctuality due to traffic congestion and a deteriorated bus fleet, lack of bus priority measures and poor interchange facilities at the district's rail stations. In the Wyre Forest, car ownership is lower than in other areas of Worcestershire, and particularly so in some of the more deprived neighbourhoods. In particular, certain protected groups (the young, the elderly and the disabled, for example), are particularly dependent on the bus network to access essential services and facilities needed to enjoy an acceptable quality of life. Furthermore, poor bus service provision in the evenings undermines the viability of the evening economy.

**13.30** Kidderminster bus station, located adjacent to Weavers Wharf and delivered as a purpose-built facility as part of that development, has proved unpopular with local operators and so has been largely snubbed in favour of on-street bus stop facilities. It is necessary to develop a road based passenger transport access strategy for Kidderminster Town Centre (bus, taxi and community transport) , to consolidate and improve the quality of facilities, as well as improving ease of interchange for this mode of transport. The provision of better road based passenger transport services and infrastructure, including bus priority measures, is a critically important element for better accessibility and economic growth in the District. Investment is also required to enhance transport technology such as Real Time Information systems and more comprehensive integrated ticketing arrangements.

**13.31** Whilst most of the population of the District reside in the three main towns, there are rural hinterlands and villages whose residents are more reliant on the private car than those in the urban areas. In particular, the transport needs of the ageing population in rural areas will be increasingly difficult to meet, as the numbers of residents without access to a car rises. More demand-responsive forms of public and community-based transport, such as community buses, dial-a-ride cars and taxis, will be required if the needs of these residents are to be met. Developments in new technology are likely to enhance the ability of community transport providers to offer flexible, accessible and responsive solutions to unmet local transport needs. These improvements should not only benefit rural users but residents in those urban neighbourhoods where conventional passenger transport provision is poor.

### **Active Travel Modes (Walking and Cycling)**

**13.32** Walking and cycling should be a normal part of everyday life, and the natural choice for shorter journeys such as going to school, college or work, travelling to the station, and for simple enjoyment. Having access to safe and attractive routes for cycling and walking is essential to tackle rising obesity and deteriorated public health, reduce congestion, improve environmental quality and increase civic pride and wellbeing.

**13.33** Rising obesity in the District is partly caused by sedentary lifestyles, so investing in high quality, continuous corridors for active travel modes (walking and cycling) will help to tackle this issue, by providing attractive environments and realistic alternative travel choices for shorter trips;

**13.34** The District is suffering the legacy of a period where land use planning tended to favour the needs of the motorist, particularly apparent at the Kidderminster ring road where the pedestrian and cycling infrastructure is of a poor quality. Although the majority of roads within the District are available to cyclists, the speed and volume of traffic on some roads makes them undesirable, particularly for new or less physically able users. There have been improvements

in walking and cycling infrastructure in recent years, however, continued investment in active travel modes, as well as improvements to the public realm in our urban areas, will help to encourage more uptake of sustainable modes and reduce dependency on the private car.

### **Worcestershire County Council Local Transport Plan 4: 2017-2030 (LTP4)**

**13.35** The Local Plan Review provides the main opportunity for the partners to contribute to the implementation of the District's transport network; the LTP4 and associated policies and overarching strategies, provide the basis on which to develop and deliver this network. It provides the policy and strategy context for major transport projects to enable Worcestershire County Council to bid for additional Government funding. It also provides a context within which developer contributions can be guided. The LTP4 document states that the challenges for the District are:

- To relieve congestion;
- To improve journey time reliability;
- To deliver transport schemes to mitigate the effect of the local plan to accommodate development growth.

**13.36** The LTP4 aims to target investment in three broad areas:

- **Transport Technology** - technology is offering increasingly attractive opportunities to help manage demand on our networks, to tackle congestion and support growth. Modern traffic signals, for example, can intelligently manage traffic flows to respond to variable demand. Improved access to dynamic travel information through a variety of media will enable users of our transport networks to make more informed travel choices;
- **Travel Choice** - increasing realistic travel choice is critical to enable our economy to diversify and grow. In addition to enhancing access to travel information, we recognise that we need to prioritise investment in alternative modes of travel. In particular, our rail network has significant potential to accommodate and support economic diversification and planned growth. Significant investment will be required in our stations, rail infrastructure and rolling stock to provide the quality of services and facilities that the 21st century passenger expects. Rising obesity in the county is partly caused by sedentary lifestyles, so investing in high quality, continuous corridors for active travel modes (walking and cycling) as well as improvements to the public realm in our urban areas will help to tackle this issue, by providing attractive environments and realistic alternative travel choices for shorter trips;
- **Capacity Enhancement** - the most expensive of the three areas, where suitable business cases can be identified to support investment, we will aim to fund and deliver capacity enhancements at key 'pinch points' to support development growth, address poor air quality issues and tackle congestion.

**13.37** Detailed plans for the implementation of transport infrastructure will come forward during the lifetime of the LTP4 and their implementation will be essential to allow for the further investment in transport infrastructure and services needed to accommodate the increased travel demand associated with future development proposals. The funding to deliver this transport infrastructure is likely to come from a variety of sources and potential funding sources include:

- Section 106 Planning Obligations

- Other developer contributions;
- Community Infrastructure Levy;
- Integrated Transport Block
- Local Growth Deal

**13.38** Developers will be required to demonstrate that they have given appropriate consideration to the potential impacts of development on the wider and strategic transport network, including that managed by Worcestershire County Council, Highways England and Network Rail.

## Introduction

**14.1** The enhancement of the District's Green Infrastructure Network will form a key part of the development strategy for the District. This policy places an emphasis on the delivery of a comprehensive network of green spaces and corridors across the District. This will help to promote active lifestyles, support biodiversity, address climate change and safeguard and enhance the District's unique landscape character.

### Policy 14 - Strategic Green Infrastructure

- A. The existing green infrastructure network will be safeguarded from inappropriate development.
- B. New development will be expected to retain, protect and enhance Green Infrastructure (GI) assets by integrating GI into developments and contributing positively to the District's green infrastructure network. Housing and employment development proposals (including mixed use schemes) will be required to contribute towards the provision, maintenance, improvement and connectivity of GI, directly delivering GI as follows, subject to viability requirements designated by the NPPF:
  - i. For Greenfield sites exceeding 1ha (gross): 40% GI.
  - ii. For Greenfield sites of less than 1ha but more than 0.2ha (gross): 20% GI.
  - iii. For Brownfield sites: no specific GI figure.
3. Development which is unable to retain, protect and enhance the integrity of the GI network and its connectivity or 'stepping-stone' features will be considered inappropriate. Within brownfield developments it is expected that key GI features such as SuDs, green roofs, green walls, and biodiversity measures will be delivered wherever possible and integrated into the wider GI network.
4. Within the identified key strategic development corridors it is expected that masterplanning for all major developments will be informed by the Green Infrastructure Concept Plans.
5. The precise form and function(s) of the GI provided will depend on local circumstances and the Worcestershire Green Infrastructure Strategy's priorities. Developers should seek to agree these matters with the Council in advance of submitting a planning application. Effective management arrangements should also be clearly set out and secured. Once planning permission has been given by the Council, the associated GI will be protected as semi-natural green open space (see also Policy 20B in respect of the provision of semi-natural green "open space").
6. Other than specific site allocations in the development plan, development proposals that would have a detrimental impact on important GI attributes within areas will not be permitted unless:

- i. A robust independent assessment of community and technical environmental need and functionality shows the specific GI typology to be surplus to requirements in that particular location and that it does not have wider negative impacts; and
  - ii. Replacement of, or investment in, GI of at least equal community and technical environmental benefit is secured for the locality or wider area.
7. To the north of Kidderminster Town Centre, the Council will safeguard the areas shown on the Policies Map in the Stour Valley for future development as a Country Park. Proposals for development which would prejudice the provision of a Country Park in these areas will not be permitted.

### Reasoned Justification

**14.2** The District has a distinctive environment comprising diverse landscape character areas including urban areas. There are many green corridors within the District which are currently fragmented but have the potential to provide a comprehensive network of green infrastructure (GI). The District's waterways in particular offer the opportunity to link the urban areas with the open countryside beyond. There are also some of the County's most important and distinctive acid/lowland heath communities and the continued protection and enhancement of these important areas needs to be considered in future development.

**14.3** The green infrastructure network for the District is set out within the Green Infrastructure Strategy for Wyre Forest District. This Strategy shows how the District's existing green infrastructure assets can be better linked in order to provide greater connectivity for both people and nature.

**14.4** Worcestershire's GI Strategy and supporting evidence base seeks to enhance opportunities to link biodiversity with drainage, historic landscape character and improved accessibility. The Worcestershire GI Strategy promotes the GI Concept Plan approach for strategic sites and seeks to promote collaborative working with developers.

**14.5** The key objective of Green Infrastructure Concept Plans is to establish principles for development which will identify key GI assets and opportunities for their protection and enhancement in line with their surrounding Environmental Character Area priorities, local policies and the broader Worcestershire GI Framework. Green Infrastructure Concept Plans have been developed for each of the identified key strategic development corridors within Wyre Forest and should inform masterplanning exercises of all major developments coming forward within these corridors. Green Infrastructure Concept Plans have been produced for the following identified key strategic development corridors:

- Kidderminster North GI Concept Plan
- Kidderminster East GI Concept Plan
- Kidderminster and Stourport Urban and Waterfront GI Concept Plan

**14.6** The Council requires developers to have regard to and contribute towards these Green Infrastructure Concept Plans for these identified key strategic development corridors. The Council has an aspiration for developers to prepare a GI Concept Plan for all large scale developments, which would then serve to inform all developments in that area as they come forward.

**14.7** GI will need to be carefully planned into new developments from the outset. When determining planning applications the way in which the proposals contribute to delivering the GI network will be of paramount importance.

**14.8** The delivery of the Stour Valley Country Park is a long-standing aspiration for the 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.

## Introduction

**15.1** The purpose of policies relating to water is to ensure that the integrated management of water resources (water supply, water conservation, water quality and waste water) is addressed as an integral part of the planning and design of developments. This includes the mitigation of flood risk and surface water drainage including Sustainable Drainage Systems (SuDS). The *Wyre Forest Water Cycle Study* (2017, and update in 2018) considers issues of water resources, wastewater and flood risk and forms a key part of the evidence base alongside the *Wyre Forest Strategic Flood Risk Assessment* (2018).

**15.2** Strategic issues faced by the District affecting the long term sustainability of the local water environment include:

- The provision for 5,520 new homes and 29 hectares of employment land which will have an impact on water resources and its role in reducing demand on available ground water supplies;
- The distribution and phasing of development sites to match the available capacity of foul sewer network and waste water treatment works so that improvements to be undertaken are in advance of development;
- The need to maintain and replenish ground water supplies, reduce flooding and increase the use of Sustainable Drainage Systems;
- Addressing watercourses in the District which have poor/moderate water quality status under the Water Framework Directive and the affect of development and the quality of waste water discharging from local treatment works.

**15.3** Policies in this section relate to several other policy areas in the Local Plan. Addressing water issues in a comprehensive and integrated way will result in more effective and sustainable solutions to managing water.

**15.4** To introduce high levels of water efficiency, new development is expected to take all available opportunities to integrate the principles of sustainable design and construction into the design of proposals.

### **Policy 15A - Water Conservation and Efficiency**

The Council will require development to demonstrate that it:

- i. Incorporates design features that will reduce water consumption. Proposals for residential development will be expected to demonstrate that a water efficiency standard of 110 litres per person per day can be achieved; and/or
- ii. Incorporates design features that will support recycling / re-use of water through measures such as rainwater harvesting and grey water recycling, especially where a large demand for water is predicted such as industrial processes or irrigation.

## Reasoned Justification

**15.5** The Water Resource Zone adjacent to the River Severn will be subject to the Environment Agency's 'Restoring Sustainable Abstraction' programme towards the middle of the plan in 2024/5. This will include the revocation of abstraction licences for ground water supplies in some areas and increased abstraction in others with plans to be agreed between Severn Trent Water (STW) and the Environment Agency (EA).

**15.6** The Council recognises that from a sustainable perspective, water should be used efficiently in order to reduce the associated energy requirements (needed to pump water, for example) and to avert adverse environmental effects such as over-abstraction. Improving water efficiency will also help to reduce the volume of wastewater that the sewer system has to accommodate.

**15.7** STW has made demand assumptions based on the increasing levels of water efficiency in the design of new homes which show that water consumption per person will drop from 120 litres per day (current) to 109 litres per day by 2034. EA has expressed support for reducing consumption of water to a level of around 110 litres per person per day.

**15.8** Developers of new dwellings will be required to demonstrate that appropriate measures to conserve and re-use water, such as low flow showers and kitchen taps, and provision of water butts and rain/grey water harvesting have been incorporated to achieve water efficiency, working to a limit of 110 litres per person per day or better. The additional cost of meeting this target have been assessed as being as little as £9 per dwelling (DCLG Housing Standards Review (Sept 2014)).

### Policy 15B - Sewerage Systems and Water Quality

The capacity and resilience of local sewerage infrastructure is critical to the sustainability of new development. In order to avoid adverse impacts of additional demand on the existing foul sewerage network, the Council requires residential development to demonstrate:

- i. How foul flows produced by the development will be drained and the identification of the agreed point of connection to the public foul sewerage network;
- ii. That sewerage and surface water will drain separately;
- iii. How development will be phased to allow Severn Trent Water (STW) sufficient time to undertake any necessary capacity improvement works to the public foul sewer network or to existing waste water treatment works prior to construction and occupation of the developments. Where development is brought forward in advance of planned capacity improvements by STW through the Asset Management Process, any required capacity improvements should be delivered via agreement between the developer and STW.

Development should follow the hierarchy (order of preference for foul drainage connection), as set out in the National Planning Practice Guidance. The Council requires non mains drainage proposals to assess the potential impacts upon water quality to ensure no detrimental impact on the water environment.

Proposals that would result in an unacceptable risk to the quality and / or quantity of a water body or water bodies will not be permitted. Strategies to help mitigate the impact of development on water quality will be required at planning application stage.

### **Reasoned Justification**

**15.9** A plan led approach to the delivery of development is critical to addressing the capacity constraints within the District's sewerage and wastewater treatment infrastructure. The main purpose of Policy 15B is to address the alignment of development with the available capacity at wastewater treatment works and where capacity is constrained ensure that improvements can be made prior to development coming forward.

**15.10** The *Wyre Forest Water Cycle Study* (2017, and 2018 update) shows that although most wastewater treatment works have capacity to accommodate additional development this available capacity is not distributed evenly and is not always sufficient to absorb the planned levels of development for the area. Phasing development across the course of the plan will allow STW to incorporate improvements into Asset Management Planning delivering key infrastructure in advance of development.

**15.11** Regular reviews of the Infrastructure Delivery Plan will help provide STW with information on any changes to the phasing of development, to feed into their Asset Management Plans in a timely manner allowing opportunities to re-deploy resources to better meet the needs of emerging development patterns.

**15.12** Receiving water courses and groundwater bodies covered by the European Union *Water Framework Directive* (2000) are subject to a basic requirement of 'no deterioration' and the objective to achieve 'good' status potential by 2015 (or 2027 as specified). A plan led approach will allow the Council, STW and EA to identify any potential water quality issues.

**15.13** Strategies to help mitigate the impact of development on water quality will be required in advance of planning approval being granted and could include on-site measures, such as SuDS, reinforcement of wastewater treatment infrastructure, restoring natural watercourses through the removal of culverts, improvements to habitats and overcoming barriers to fish movement. To protect the receiving water environment developers are required to set out how surface water from the development will be treated sufficiently, using the simple index approach included in the *CIRIA SuDS Manual* (2015).

### **Policy 15C - Flood Risk Management**

In line with the NPPF and NPPG the Council will steer new development to areas with the lowest probability of flooding. In order to minimise the impacts of and from all forms of flooding, the Council requires all development in areas thought to be at risk of flooding to:

i) Ensure development proposals are located in accordance with the Sequential and Exception Test where appropriate and also take account of the latest versions of the Strategic Flood Risk Assessment, the Worcestershire Local Flood Risk Management Strategy, and the Worcestershire Surface Water Management Plan.

ii) Submit a site specific Flood Risk Assessment (FRA), which confirms:

- the wider hydrological context of the site.
- the development is safe from flooding for its lifetime, taking into account all forms of flooding. This shall include safe access and egress.
- finished ground floor levels will be set a minimum of 600 mm above the 1% annual probability (1 in 100 year) river flood level plus climate change allowance.
- finished ground floor levels will be set no lower than the modelled 1% annual probability (1 in 100 year) surface water flood level plus climate change allowance.
- the development will not increase the risk of flooding elsewhere, and proposals will detail how existing flood flow paths on the site will be accommodated, how the amount of flood storage will be maintained and how surface water runoff will be addressed.
- the development layout is informed by the management of residual flood risk and the drainage strategy for the site, which incorporates sustainable drainage systems (SuDS) as set out in Policy 15D.

The FRA shall use modelled flood level data where possible and shall take into account appropriate allowances for climate change, using the latest Environment Agency's local Climate Change Guide.

Planning permission for development will only be granted where:

iii) The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce overall flood risk in the area and beyond.

iv) The natural watercourse and flood plain profiles are not adversely affected. Where practicable, any culverted (piped) watercourses will be opened up to improve drainage and flood flows. Proposals involving the creation of new culverts will not be permitted unless essential to the provision of access.

v) A minimum 8 m access strip is provided adjacent to watercourses for maintenance purposes. It should be appropriately landscaped for biodiversity benefits. The width of the strip may be reduced for smaller watercourses, where agreed by the Local Planning Authority.

## Reasoned Justification

**15.14** It is essential that new development minimises its impact on the built and natural environment. This includes reducing risk of flooding through incorporating features such as Sustainable Drainage Systems (SuDS) (Policy 15D). The purpose of Policy 15C is to take a proactive approach to managing flood risk from watercourses, sewer, heavy rainfall and groundwater sources.

**15.15** Areas of the District are subject to regular flooding instances. Certain areas are at risk of flooding due to existing drainage systems and watercourses becoming overwhelmed during or following heavy rainfall, whereas areas adjacent to the River Severn are predominantly at risk of flooding following prolonged rainfall outside the District. The Council works closely with multiple agencies (including the EA and STW) to address flooding issues.

**15.16** The Local Plan plays an important role by requiring new developments to provide integrated flood mitigation methods and by working to retain surface water runoff on-site through sustainable drainage, integrating flood mitigation measures and providing appropriate buffering between watercourses and development. Development needs to be resilient to flood risk and the effects of climate change for its lifetime by setting appropriate floor levels, providing safe pedestrian and vehicle access and where appropriate provide a flood evacuation management plan, exceedance route plan and a SuDS maintenance plan.

**15.17** Development can make improvements by reducing the length of culverted watercourses. This can have the added benefits of improving access to water features, improving local habitats and using water bodies as a catalyst to enhance the ecological value of an area. The Council recognises the value of open watercourses on or adjacent to development sites as part of wider green infrastructure which helps improve the health and wellbeing of residents and visitors through opportunities for active travel, informal recreation and visual amenity in and around the District's extensive Green Network.

### **Policy 15D - Sustainable Drainage Systems (SuDS)**

Effective on-site management of surface water can improve water quality, water conservation, the replenishment of ground water supplies and reduce instances of flooding. The Council therefore requires all development with surface water drainage impacts to ensure that flows and volumes of surface water runoff leaving a development site do not exceed Greenfield levels. For re-development (Brownfield) applications, substantial betterment is expected where limiting to Greenfield levels is deemed not reasonably practicable. Any surface water drainage scheme will be expected to not adversely affect the receiving water bodies, both during construction and when operational.

The design and development of the site's surface water drainage scheme should include:

- i. Assessing the potential for management of surface water to be wholly or partially achieved via infiltration.
- ii. Providing Sustainable Drainage Systems (SuDS) for the management of surface water. The design and construction of the SuDS should be in line with the non-statutory

technical standards for SuDS (Defra, 2015) and WFDC SuDS Design and Evaluation Guide (2017). The SuDS design should also make allowances for:

- Climate change, in line with the latest Government's Climate Change Allowances guidance.
- Future development in residential development ("urban creep"), dependent on the housing density, following the Local Authority SuDS Officer Organisation (LASOO) Practice Guidance for the non-statutory standards for SuDS or any replacement guidance.
- Improvements to the Green Infrastructure and biodiversity of the area.

For all major applications the Council requires to see a detailed Drainage Strategy that demonstrates how the proposed drainage system meets the criteria set out above and how the proposed drainage system will be managed and maintained for the lifetime of the development.

### Reasoned Justification

**15.18** This policy should be read in conjunction with the *Wyre Forest Water Cycle Study* (2017, and 2018 update). All new development will require a suitably designed drainage system in order to mitigate the risk of surface water and overland flooding both on and off the site.

**15.19** The Water Cycle Study provides more detail on the implementation of greywater recycling, rainwater harvesting and SuDS. Developers should allow for sufficient land for SuDS to be designed in at the outset; lack of space is not considered appropriate justification for not accommodating SuDS. A range of SuDS methods are available, although some will be more suited to some sites than others. SuDS selection should be specific to a site and should not be limited to one technique per site. Consideration should be given to source control within the surface water drainage proposals, which can be achieved through a range of techniques.

**15.20** There will be a clear presumption in favour of at surface level, multi-functional and biodiversity-led SuDS and sites should be assessed on their merits to determine which SuDS techniques are the most suitable particularly where contaminated land may be an issue. It is considered that all development sites are able to incorporate some form of SuDS; the scale of these techniques should be proportionate to the scale of development proposed. All surface water run-off should be properly treated (see 15.13).

**15.21** New development must not create adverse pressures on the water environment that could compromise the District's ability to meet the Water Framework Directive (WFD) objectives. Development is required to conserve and where feasible enhance watercourses and riverside habitats, through management and mitigation measures for the improvement and/or enhancement of water quality and habitat of any aquatic environment in or adjoining the development site. It is also important for applicants to bear in mind the importance of the River Basin Management Plan and the Worcestershire Surface Water Management Plan when putting together proposals.

**15.22** Like all drainage systems, SuDS components should be inspected and maintained. This ensures efficient operation and prevents failure. The design process should consider the maintenance of the components and a SuDS management plan for the maintenance of SuDS should be prepared. SuDS components that are on or near the surface can often be managed using landscape maintenance techniques. For below-ground SuDS such as permeable paving and modular geocellular storage the manufacturer's maintenance advice should be followed.

**15.23** Developments should make allowance for future development for example the hard surfacing of previously green areas such as gardens, in the design and capacity of drainage systems. Local evidence shows that change occurs over time as residents extend their properties through property extensions, tarmac front gardens for extra parking spaces, use hard surfacing to reduce maintenance in gardens as well as businesses seeking to provide more parking for employees.

### Policy 16A - Pollution and Land Instability

A. Development proposals must be designed in order to avoid any significant adverse impacts from pollution, including cumulative ones, on any of the following:

- Human health and wellbeing.
- Biodiversity.
- The water environment.
- The effective operation of neighbouring land uses.
- An existing or proposed Air Quality Management Area (AQMA) <sup>(15)</sup>

B. Development proposals will not be permitted where the land is contaminated <sup>(16)</sup> and not capable of appropriate remediation without compromising development viability or the delivery of sustainable development. For sites where land contamination is suspected, an adequate site investigation survey will need to be prepared (by a competent person) to demonstrate that land contamination issues have been fully addressed or can be addressed through the development.

C. Development proposals will not be permitted in locations where there are risks from land instability. Development proposals within areas of known or suspected to be a risk of slope instability or poor ground conditions will need to demonstrate the following:

- i.) Its structural integrity will not be compromised by slope instability;
- ii.) The development does not exacerbate any instability on the site or elsewhere;
- iii.) The development can tolerate ground conditions by special design; and
- iv.) There is long term stability of any structures built on filled ground.

For sites suspected of land instability, an adequate site investigation survey will need to be prepared (by a competent person) to demonstrate that land instability issues have been fully addressed.

### Reasoned Justification

**16.1** The NPPF<sup>(17)</sup> clearly sets out, in broad terms, that pollution and land instability are material planning considerations.

**16.2** Pollution can and does have detrimental impacts on the environment and human health. In the absence of a robust local plan policy, both the quality of life of local residents and the ecology of the area would be compromised.

15 The countywide Worcestershire Air Quality Action Plan (September 2013) includes maps of the AQMA in the plan area and is available at <http://www.worcsregservices.gov.uk/media/486190/Final-AQAP-Whole-Doc-v23b-adopted.pdf>

16 As defined under Part IIA of the Environmental Protection Act 1990

17 NPPF Paragraphs 178, 179, 180, 181

**16.3** Pollution can take many forms, e.g. chemical, dust, light, noise, fumes, smell, vibration, all of which can have detrimental impacts on the environment and the quality of life. These potential adverse effects must be carefully considered in the assessment of any planning application and can be the basis for the refusal of a planning application if not adequately addressed. Developers are encouraged to have pre-application discussions with the Council to be advised on the specific requirements.

**16.4** Assessments should:

- Identify the sensitive receptor(s) which may be affected by the proposed development, including residents, businesses, land users and sensitive environmental assets;
- Consider the potential for cumulative impacts with other existing or approved development;
- Demonstrate the measures which would be implemented to ensure adverse impacts would be avoided at source or, where this is not possible, outline the proposed management and mitigation measures to reduce effects to an acceptable level; and identify the significance of any residual effects.

**16.5** Developers are expected to proactively monitor impacts and emissions to enable issues to be addressed swiftly. Close liaison with communities can support this approach, enabling feedback and dialogue on the need for and effectiveness of any mitigation measures.

**16.6** The Wyre Forest District overlies a principal aquifer of regional strategic importance in terms of water supply and there are a number of Source Protection Zones (SPZs) to protect public water resources. For proposed developments that will have an impact on or are affected by groundwater, the Environment Agency's Groundwater protection position statements should be considered to help provide appropriate control measures, especially in areas designated as Source Protection Zone 1 (SPZ1).

**16.7** The term 'poor ground conditions' referred to in Policy 16A may include, but is not limited to the following:

- Poorly consolidated made ground and fill material;
- Soft, weak and wet natural soils;
- Areas of shallow mine-workings and mineshafts; or
- Colliery spoil mounds.

## **Minerals**

**16.8** At present, minerals policy and proposals for the County of Worcestershire are set out in the policies of the Minerals Local Plan (1997) that were "saved" by the Secretary of State in September 2007. These "saved" minerals policies will be replaced by the revised Worcestershire Minerals Local Plan upon its adoption (currently anticipated in spring 2021) which will form part of the overall Development Plan for Wyre Forest District.

**16.9** Most of the north-west of Worcestershire consists of Old Red Sandstone. Carboniferous strata occur in the western parts of Wyre Forest Area where they form a western continuation of the South Staffordshire Coalfield. These strata contain layers of sandstone and shales, ironstone and coal deposits. The NPPF states that permission should not be given for the

extraction of coal unless the proposal is environmentally acceptable or can be made so by planning conditions or obligations or it provides national, local or community benefits that clearly outweigh the likely impacts. Any planning application for coal extraction would be determined by Worcestershire County Council as the Mineral Planning Authority.

**16.10** The Permian and Triassic rocks of the following Upper Palaeozoic and Mesozoic eras are generally softer, comprising sandstones and marls and make up the greater part of central Worcestershire, including the eastern parts of Wyre Forest. Overlying the 'solid geology' are Quaternary deposits of 'drift' material. These include till / boulder clay deposited directly by glacial ice as fluvio-glacial deposits which can be found particularly along the valleys of the Rivers Severn and Stour.

### Policy 16B - Minerals

1. Developers will be encouraged to reuse and recycle construction waste on-site and use substitute or secondary and recycled minerals within development to reduce the use of primary materials.
2. Proposed development in Minerals Consultation Areas will be required <sup>(18)</sup> to assess the potential for the proposed development to sterilise locally or nationally important mineral resources, or impact on the operation of permitted mineral sites or supporting infrastructure. Planning permission will not be granted for non-mineral development that would lead to the unnecessary sterilisation of mineral resources or unacceptable impacts on the operation of permitted mineral sites or supporting infrastructure within a Minerals Safeguarding Area (MSA) unless:
  - i. The applicant can demonstrate that the mineral concerned is no longer of any value or future potential value, or the supporting infrastructure is no longer necessary to facilitate minerals working; or
  - ii. The development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or
  - iii. Where sterilisation of a locally or nationally important mineral resource could occur, opportunities for extraction of the resource will be optimised prior to any non minerals development commencing; or
  - iv. Where permitted mineral sites or supporting infrastructure could be compromised, sufficient mitigation measures will be put in place to ensure their continued operation.
3. Minerals development and extraction should not have an unacceptable impact, including cumulative impact, upon:

18 Excluding 'exempt development', namely householder applications; development already allocated in the Local Plan; infilling in existing built-up areas.

- i. The historic environment including heritage and archaeological assets. Restoration of minerals extraction sites which impact on heritage assets or their settings should be appropriate to the maintenance of and the significance of those assets.
- ii. The natural environment including biodiversity and ecological conditions for habitats and species.
- iii. Amenity including noise, air pollution (including dust), water levels and water quality.

### Reasoned Justification

**16.11** The NPPF indicates that local planning authorities should define Minerals Consultation Areas (based on Minerals Safeguarding Areas) and should take account of the contribution that substitute or secondary and recycled materials can make to the supply of materials.

**16.12** The broad extent of mineral resources that occur in Wyre Forest District is shown on the Worcestershire County Council Emerging Minerals Local Plan interactive map.<sup>(19)</sup>

**16.13** Development can "sterilise" mineral resources (make them inaccessible for potential extraction) or prejudice the operation of mineral sites and supporting infrastructure. This can be either directly, for example by building over land that contains minerals; or indirectly, for example through the introduction of sensitive land uses in close proximity to these resources or sites.

**16.14** Minerals Safeguarding Areas (MSAs) are areas designated by the Minerals Planning Authority that cover known deposits of minerals that are desired to be safeguarded from unnecessary sterilisation by non-mineral development. MCAs, based on MSAs, are where consultation is required with Worcestershire County Council as the Minerals Planning Authority on development proposals that have the potential to sterilise the minerals interests of the site.

The boundaries of the existing MSAs are shown in the currently adopted Herefordshire and Worcestershire Minerals Local Plan

(20)

These boundaries may be changed during the preparation of the Worcestershire Minerals Local Plan.

**16.15** The Local Planning Authority will consult the County Council on any planning application received for non-minerals development which falls within the boundary of a MSA.

**16.16** Proposals which are in MCA should take a sequential approach to considering the following possible outcomes:

19 <http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/>

20 [http://www.worcestershire.gov.uk/info/20015/planning\\_policy\\_and\\_strategy/1009/adopted\\_minerals\\_local\\_plan](http://www.worcestershire.gov.uk/info/20015/planning_policy_and_strategy/1009/adopted_minerals_local_plan)

1. Extracting all of the resources within the proposed development site and in the area which would potentially be sterilised by the development, either in advance of development taking place or in phases alongside the development;
2. Where extracting all of the resource would prevent establishment of a suitable landform for subsequent development, consider whether a proportion of the resource could be extracted; or
3. As a last resort if neither (1) nor (2) is possible, consider whether any opportunities exist for "incidental recovery of the mineral resource."

**16.17** Permitted minerals sites and the supporting infrastructure of existing potential storage, handling and transport sites are important to delivering a steady and adequate supply of mineral resources in Worcestershire, and it is therefore important that they are not adversely impacted by insensitive or inappropriate development that would conflict with the use of sites identified for these purposes.

**16.18** Different types of development may or may not conflict with the use of the mineral site or supporting infrastructure. The potential for conflict is a function of both the sensitivity of the land use or receptors at the proposed development and the techniques or processes employed at the minerals or infrastructure site. Applicants will need to assess whether the normal operation of the mineral site or supporting infrastructure could have adverse impacts on the proposed land use or any users of the proposed development. This should include consideration of issues such as (but not limited to) any noise, vibrations, dust, or fumes that may result from the normal operation of the site, and could lead to complaints which could jeopardise the continued operation of the mineral site or supporting infrastructure. Techniques such as considered design, site layout and landscaping or screening of the proposal may in some cases be adequate to mitigate any impacts.

**16.19** The identification of a MSA does not imply that permission for extraction will be given, only that the presence of minerals is a material consideration that must be addressed when considering future development.

### **Secondary and Recycled Aggregates**

**16.20** To sustain economic growth without increasing the use of land-won aggregates, it is vital that the contribution of secondary and recycled materials used in construction projects is increased. On site recycling and reuse of construction materials will therefore be encouraged, having regard to the environmental implications of any proposed operations and their overall acceptability. The use of substitute or secondary and recycled materials in development will also be encouraged.

### **Legacy of Minerals Extraction**

**16.21** Where development is proposed in areas with a known legacy of minerals extraction, the developer will be expected to assess the site for ground contamination, ground stability and mining hazards and submit appropriate mitigation reports in support of their planning application.

**Waste**

**16.22** Planning applications relating to the use of land (and buildings) for the purposes of waste management will be determined by Worcestershire County Council. The Waste Core Strategy, adopted by the County Council in November 2012 and covering the period up to 2027, is complementary to the Wyre Forest Local Plan and forms part of the development plan.

**Policy 16C - Waste**

Proposals for new development should incorporate adequate facilities into the design to allow occupiers to separate and store waste for recycling and recovery unless existing provision is adequate. Waste management facilities should be well-designed.

**Reasoned Justification**

**16.23** National Planning Policy for Waste (October 2014) sets out national waste planning policies. It should be read in conjunction with the NPPF, the Waste Management Plan for England and National Policy Statements for Waste Water and Hazardous Waste, or any successor documents.

**16.24** To minimise waste and pollution and reduce the impact of waste on Climate Change Wyre Forest District Council expects future developments to support the waste management hierarchy. The waste hierarchy gives top priority to preventing waste in the first place. Where waste is generated, priority is to reuse, then recycle, then other forms of recovery such as energy recovery and last of all disposal (for example landfill).

**16.25** To ensure waste is dealt with at as high a level as possible on the waste hierarchy, and to protect amenities and prevent pollution, the waste implications of all new development must be considered.

**16.26** To safeguard existing or permitted waste management facilities Wyre Forest District Council will consult Worcestershire County Council on any planning applications within 250m of such a site, in accordance with the Waste Core Strategy. Maps showing existing waste management facilities with a 250m buffer are shown on the Worcestershire County Council's website.

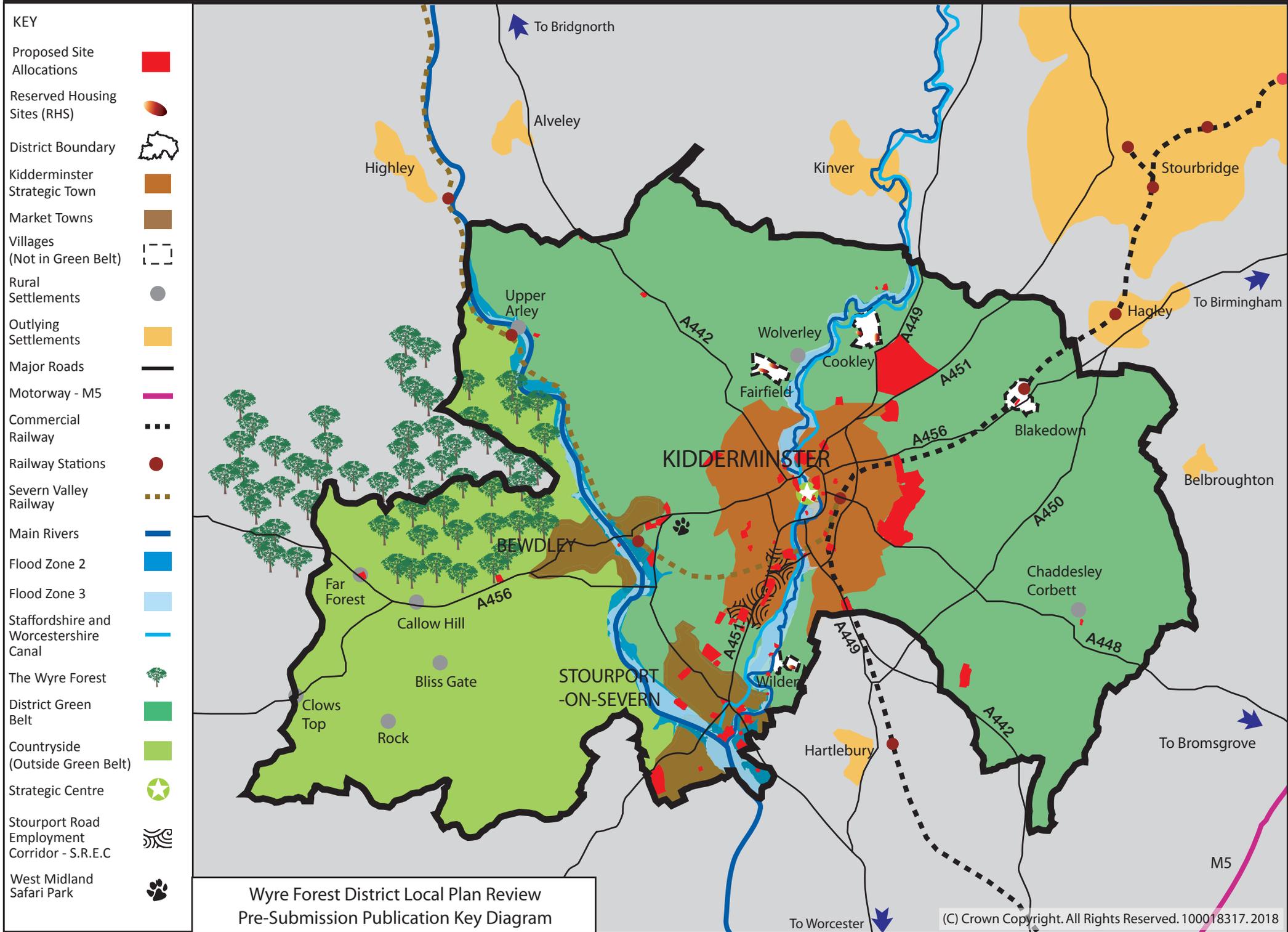
**16.27** The Waste Core Strategy requires that on-site facilities for separating or storing waste should be adequate to meet the needs of occupiers of any proposed new development. Waste management facilities should be well designed so that they do not act as an eyesore.

**16.28** On smaller sites, provision might include collection points for segregated waste. On larger sites, particularly where significant areas of new housing or employment land are proposed, waste storage facilities will almost always be needed and provision might also include on-site treatment facilities such as community composting, anaerobic digestion forming part of a district heating system or, in the case of industrial operations, the management of specific wastes produced on site.

**16.29** Specifications for the minimum standards for the type and scale of facilities and vehicular manoeuvrability needed for new residential, commercial and mixed-use developments will be informed by the ADEPT report 'Making Space for Waste' (June 2010)<sup>(21)</sup> All applications will be assessed against this guidance.

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21 [http://www.lgcplus.com/Journals/3/Files/2010/7/14/ADEPTMakingspaceforwaste\\_000.pdf](http://www.lgcplus.com/Journals/3/Files/2010/7/14/ADEPTMakingspaceforwaste_000.pdf).



Wyre Forest District Local Plan Review  
Pre-Submission Publication Key Diagram

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**17.1** The Development Management Section of the Wyre Forest District Local Plan sets out the Council's planning policies for managing development and growth in the District from 2016 until 2036. It will be used to guide, assess and determine planning applications. The Council's aim is to produce a comprehensive planning framework to ensure that the District's housing, employment, infrastructure and other needs are met over the plan period in a way that contributes to achieving sustainable development. Following on from the strategic framework it will set out the development allocations and detailed policies for managing new development.

**17.2** The plan and policies in this section should be read alongside the Strategic policies set out in Part A of this Local Plan and any Wyre Forest District Council Supplementary Planning Documents (SPDs). The Council will produce SPDs where it considers them necessary to provide more details on the policies set out within other parts of the Local Plan. SPDs are not part of the statutory development plan and do not have the same weight; however, they will be significant considerations in determining planning applications.

**17.3** The primary objective of development management is to enable the delivery of sustainable development. Development management is not intended to hinder or prevent sustainable development. The Council sees development management as a positive and proactive approach to shaping, considering, determining and delivering development proposals.

**17.4** In combination with each other the development management and site allocations policies set out the specific development intentions of Wyre Forest District Council for the Plan Period 2016-2036 as follows:

- **Development Management Policies:** Detailed planning policies which will be used by the council when assessing planning applications.
- **Site Allocations:** Sites to be allocated for development for particular land uses, for example housing, employment and mixed uses. This is to provide clarity to the community and developers regarding land uses that, in principle, are acceptable to the council on specific sites.

**17.5** These sections of the Local Plan include additional detailed policies where it is considered that further detail is required to provide the necessary detail for the interpretation of the strategic policies and to provide a proper basis for local development management.

**17.6** Government guidance makes it clear that a Local Plan should not repeat policies that are in either National Policy or other 'development plan' documents. The absence of a policy for a particular topic in the Local Plan therefore does not necessarily mean that the topic is unimportant; it may be that there is already a relevant adopted policy and must therefore be read in conjunction with the other relevant plans and guidance.

**18.1** The following section includes the Development Management Policies that will be used to determine residential planning applications. These provide more detailed criteria for decision makers and should be considered within the overall strategic context of Section 8 – A Desirable Place to Live.

### **Viability of Affordable Housing Requirements**

**18.2** This policy provides the framework against which negotiation over the proportion and type of affordable housing on individual sites will be considered to take account of specific viability issues.

#### **Policy 18A - Financial Viability**

Requirement as set out in Section 8 are assumed to be viable. It is up to the applicant to demonstrate that the requirements are not viable. Where an applicant considers that it is not viable to meet the requirements as set out in Policy 8, the District Council will require robust evidence that the following criteria have been met:

- i. The applicant must provide a full viability assessment which demonstrates that the required level of affordable housing or any other requirement or planning obligation is not viable. The methodology, underlying assumptions and software to be used should be agreed with the District Council or its consultants at pre-application stage. Applicants should refer to and follow the advice contained in the Council's Viability Study.
- ii. Where the District Council considers it necessary to obtain independent advice to validate a viability assessment which has been submitted, the applicant will be required to meet all reasonable costs of doing so.
- iii. The viability assessment should be presented on either a residual land value or profit basis which should be agreed with the District Council in advance.

### **Reasoned Justification**

**18.3** Where an applicant considers that there are significant cost constraints affecting a development site and that these are sufficient to impede the developer meeting the Council's affordable housing policy expectations of 25% on residential or other planning obligations and requirements on development sites, they will be expected to demonstrate that the viability of the proposals would be jeopardised by this level of provision.

**18.4** The applicant will be required to provide financial information in the form of a full viability assessment carried out by a suitably qualified person to enable the Council to assess the nature, extent and impact of the constraints and the level of affordable housing that could be provided.

**18.5** It is recommended that the methodology, underlying assumptions and any software used to undertake the appraisal should be agreed with the Council during pre-application discussions. This will ensure that the viability assessment includes the level of detail required by the Council.

**18.6** Where the Council needs to seek independent advice to validate a viability assessment submitted by an applicant, then it will require all reasonable costs of the independent advice to be met by the developer. All information submitted by the applicant will remain confidential.

**18.7** The viability assessment should be presented on a residual land value or profit basis, which takes into account various inputs, including projected sales revenues and values (including affordable housing revenue) to establish a Gross Development Value (GDV) from which Gross Development Costs (GDC) are deducted. GDC either includes i) a site value as a fixed input cost resulting in a developer's return or profit becoming the residual figure which is then compared to a benchmark profit level to assess viability, or ii) a developer's return is adopted as an input cost giving a residual site value which reflects the land value that a developer would pay for the site. The residual land value should then be compared to the benchmark market value of the site.

### **Policy 18B - Residential Infill Development**

Infill development is defined as residential development of up to 6 dwellings in an otherwise built up frontage.

Residential developments on infill plots within the settlement boundaries of the three main towns and the villages will be encouraged provided that they contribute to the existing character of the area in terms of design, density and layout.

- i. Proposals that would lead to the over development of a site will be resisted.
- ii. The design, scale and layout of the proposed development should take account of existing dwellings to ensure that there are no adverse impacts associated with overlooking and disturbance to neighbouring properties.
- iii. All new proposals for infill development should take account of the design principles as set out in the District Council's adopted Design Supplementary Planning Document and the Government's Nationally Described Space Standards.
- iv. Applicants will be required to demonstrate that proposals include adequate car parking space unless the character and local distinctiveness of the area dictates otherwise. Proposals should not have an adverse impact on existing road safety or cause amenity and parking issues for existing residents.
- v. Infill development proposals sited within the Conservation Area or adjacent to heritage assets will need to be in keeping and not harm the form, character and setting of the Conservation Area or heritage assets. They also must demonstrate accord with Historic Environment Policies 11B and 26; also Policy 27A Quality Design and Local Distinctiveness.

## Reasoned Justification

**18.8** Residential developments (up to 6 dwellings) on infill plots within the settlement boundaries of the three main towns and the villages are likely to contribute towards new housing provision in the District. Whilst such developments are generally to be encouraged, it is important that they are well designed to protect and enhance the existing character and amenity of the residential areas.

**18.9** The Council will assess the effect that proposed residential infill developments will have on the amount of daylight and overshadowing neighbouring properties receive. Proposals that are likely to have an adverse impact and do not meet design guidance will not be permitted.

### Policy 18C - Flat Conversions

Proposals for the conversion or sub-division of existing buildings into flats will be considered having regard to the intensity of the proposed use and the accessibility of the location to shops and other services.

Proposals will be supported provided that:

- i. Conversion is not detrimental to the appearance of the building and the building and plots are of a suitable and adequate size for conversion.
- ii. Appropriate provision is made for parking, cycle parking, private amenity space and refuse storage.
- iii. The proposal will not be detrimental to the character of the area.
- iv. The internal layout minimises noise disturbance and overlooking to neighbours.
- v. It can be demonstrated that development and the site location provides appropriate opportunities to promote sustainable transport modes.

## Reasoned Justification

**18.10** The District has a number of larger properties for which the original use may no longer be viable. Sub-dividing such buildings into smaller residential units can secure the future of such buildings; however it needs careful consideration to ensure that proposals safeguard the character of the area. This policy serves to ensure that any such development does not have a detrimental impact on the character of the area and the quality of life of existing residents.

**18.11** The sub-division of existing dwellings can be a suitable means of providing smaller accommodation. Where the existing dwelling is important to the character of the area, conversion into flats can secure the future of the building.

**18.12** The intensification of the use of the building can lead to detrimental impacts for neighbouring properties including increased levels of noise and issues associated with an increased number of vehicles at the property. Adequate parking provision should generally be made within the curtilage of the dwelling. However, in town centres, parking requirements may be relaxed where this is not possible or desirable.

**Policy 18D - Residential Caravans and Mobile Homes**

The use of caravans and mobile homes for residential purposes will only be permitted for temporary periods to meet specific short term needs as follows:

- i. To temporarily re-house households during redevelopment or major refurbishment to existing housing schemes.
- ii. To provide temporary accommodation for workers, but not worker's families, during the construction, major alteration or repair of a dwelling, provided that the mobile home can be satisfactorily sited within the curtilage of the dwelling.
- iii. To meet a temporary or seasonal agricultural or forestry need.
- iv. To provide temporary accommodation for a carer, but not carer's family, provided that the mobile home can be satisfactorily sited within the curtilage of the dwelling, and that the temporary accommodation is no longer than six months.

**Reasoned Justification**

**18.13** Caravans and mobile homes are not considered to be appropriate to meet long term permanent housing needs due to their limited size and design. The use of residential mobile homes will therefore be restricted to occasions when they may be required to meet a temporary need, for example, during construction or major alterations/repairs to a dwelling or group of properties, in instances relating to the needs of agriculture and forestry, or in case of the need of a carer, which will be temporarily either due to the nature of the disability or illness of the cared, or because the carer is currently looking for more permanent accommodation.

## Site Standards for Gypsies, Travellers and Travelling Showpeople

**19.1** This policy sets out specific requirements in relation to the design of sites for Gypsies, Travellers and Travelling Showpeople which are consistent with Policies 8F (Gypsy and Traveller Site Provision) and 8G (Site Provision for Travelling Showpeople).

### Policy 19 - Site Standards for Gypsies, Travellers and Travelling Showpeople

Proposals for Gypsy, Traveller and Travelling Showpeople sites will only be granted planning permission where:

- i. Pitch boundaries are clearly demarcated using an appropriate boundary treatment and landscaping which is sensitive to the local context. There should be a clear delineation between public and private areas and between residential and non-residential areas.
- ii. The site layout gives adequate consideration to pedestrian safety, cycle movements and vehicle movements and provides adequate space for vehicles, towing caravans to enter, exit and manoeuvre around the site and for refuse collections.
- iii. All necessary utilities can be provided on the site including mains water, electricity supply, surface water and foul water drainage, sanitation and provision for the screened storage and collection of waste including recycling.
- iv. Sites of 5 or more pitches should include a communal recreation area for children where suitable provision is not available within walking distance. Play areas should be designed in consultation with the site manager and residents and should meet local authority standards.

### Reasoned Justification

**19.2** Gypsy and traveller sites should be well-designed and provide adequate amenity and safety levels for residents, including the provision of communal facilities and sufficient space for safe vehicle movements, including for refuse collections.

**19.3** Private gypsy and traveller sites will need to apply for a license and will be required to meet conditions which are based on the national model standards and relevant to the site in question. The site license conditions are applied to protect the amenity and safety of the residents of the site. These license conditions will cover issues including around the provision of facilities, layout of sites, spacing out of pitches and safety requirements.

**19.4** The Good Practice Guide on Designing Gypsy and Traveller Sites (published by DCLG in 2008 and cancelled in 2015) suggested that, where possible, sites should be developed near to housing for the settled community as part of mainstream residential developments. Planning Policy for Traveller Sites also says that new Traveller site development in open countryside that is away from existing settlements should be very strictly limited and that any sites in rural areas should respect the scale of, and not dominate the nearest settled community. The guidance also states the sites should have access to water, electricity, drainage and sanitation.

**20.1** Access to community facilities and the provision of such new facilities to complement new development is important in determining the acceptability and attractiveness of a location to live and work and can be an important factor in the encouragement of a healthy lifestyle (see also Policy 9).

### Issue 1

#### Summary of Preferred Options responses:

- General support for policies.
- Support for policies protecting green open spaces as they and footpaths need to be protected for communities.
- Rights of way should be protected and enhanced in conformity with the NPPF.
- Concern regarding a shortfall in facilities and this needing to be made up rather than relating to the need of a new development, and how this will relate to viability.
- Facilities must be accessible for all including those with special needs.

#### Policy 20A - Community Facilities

- The provision of new community facilities or the enhancement of existing facilities will be permitted, subject to satisfying the sequential test in the NPPF, where applicable, where they are demonstrated to meet an identified local need. Proposals for new community facilities which can offer an increased overall provision will be supported subject to not conflicting with any other policies contained in the Plan.
- Heritage assets can have a positive impact on its location and its communities. The use of under used heritage assets to provide community facilities as a benefit to the community and the historic environment will be supported.
- Sites that have existing community, natural or historic points of interest within the site boundary should look to enhance these assets within the development.
- Any proposal that would result in the loss of land or buildings currently or formerly used as a community facility will only be permitted if:
  - i. It has been demonstrated that there is a surplus of similar provision in the appropriate catchment area for that particular facility and the land or building(s) are not needed for any other community facility; or

- ii. The community facility, lost as a result of the proposed development, would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
  - iii. The development is for alternative community facilities to meet local needs and, in the case of the loss of sports and recreational facilities, the benefits of which clearly outweigh the loss; or
  - iv. In the case of community facilities other than sports and recreational facilities, it has been demonstrated that it would not be economically or operationally viable to retain the facility for community use and the community facility could not be provided or operated by either the current occupier or by an alternative occupier (e.g. by a local community body, public-private partnership etc) and it has been marketed for at least 12 months.
- Applicants are required to scope existing facilities in the area and consider whether it would be more appropriate to combine or rationalise existing facilities in the first instance.
  - Applicants proposing to re-develop or convert a community facility should demonstrate that they have consulted the appropriate community prior to the submission of a planning application.

### Reasoned Justification

**20.2** Community facilities comprise specific buildings (and associated land) for a range of uses including (but not exclusively):

- Health facilities
- Emergency services i.e. ambulance, fire & police
- Educational establishments, such as schools and colleges
- Community centres and village halls
- Leisure and cultural facilities
- Allotments
- Public houses
- Places of worship
- Libraries
- Built sports facilities
- Cinemas and theatres

- Formal sports pitches and courts
- Historic and environmental points of interest

**20.3** This policy is consistent with the NPPF (paragraphs 83-84, 91-92, 96-97). Alongside national planning policies and Policy 12 (Strategic Infrastructure), the Infrastructure Delivery Plan will set out the need for new community facilities to service the anticipated level of housing growth. The adopted Built Facilities and Playing Pitch Strategies will further inform the application of this policy.

**20.4** The policy allows for changes under the Localism Act 2011. This permits the listing of Community Assets, the Community Right to Challenge (in delivering public services) and the encouragement of communities to run their own facilities, or for a community to plan for its local area through neighbourhood planning. This allows for the consideration of a wider range of community services when appropriate, acknowledging that the importance of particular facilities will vary between communities. It is essential that the community is involved in considering the merits of any new facility and the suitability of proposals for alternative forms of use.

**20.5** Wyre Forest District Council wish to protect valuable community facilities and services that play an important role in the social infrastructure of the District and help to secure sustainable communities. These mainly local facilities are particularly important in helping to maintain a high quality of life for local residents, some of whom have limited access to alternative facilities further afield. Under certain circumstances it may be more appropriate to look to combining or rationalising facilities in a locality rather than replicate through a new proposal. In situations where a facility may be redundant, no longer fit for purpose and/or incompatible with existing surrounding uses a robust assessment should have taken place.

**20.6** In the case of any proposals that would result in the loss of a community facility, a satisfactory assessment should be undertaken (using recognised national methodology, e.g. Sport England), that proves there is a surplus of similar provision in the appropriate catchment area for that particular facility and the site or building is not needed for any other community service/use. Also that the loss of the facility would be replaced by equivalent or better provision in terms of location, quantity or quality; and, if the development is for an alternative sports or recreation provision, the need for it must outweigh the loss of the existing community facility.

**20.7** When applying these tests to specific proposals, the Local Planning Authority will have full regard to the particular characteristics, needs, service priorities and objectives of the service or organisation concerned. The implications of maintaining and running new facilities will also be an important consideration.

**20.8** For urban areas, proposed facilities should ideally be located within development boundaries. Within rural areas, proposals should be located within, or adjoining, the settlement subject to compliance with other relevant policies.

### Policy 20B - Open Space

- A. Open space is identified on the Policies Map and includes a range of private and public open spaces and associated community facilities. Open Space sites will be safeguarded from development unless:
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity or quality in a suitable location; or
  - An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
  - The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- ii. This policy should be read in conjunction with Policy 14 (Strategic Green Infrastructure). Any new Green Infrastructure secured under these policies will be designated and protected as green Open Space.
- iii. Local Green Space allocated by Neighbourhood Plans will be supported if the proposal is compliant with NPPF paragraph 100; and
- Is in reasonably close proximity to the community it serves;
  - Is demonstrably special to a local community and holds a particular local significance;
  - Is local in character and is not an extensive tract of land.

### Reasoned Justification

**20.9** Well-designed, attractive and functional open space is an essential component for a high quality of life. It contributes positively to biodiversity, health and the character of an area and can also help to mitigate the impacts of extreme temperatures and flash flooding.

**20.10** The NPPF (paragraphs 92, 96, 97) emphasises the benefits of recreational open space in terms of its contribution to creating sustainable patterns of urban and rural development, its role in maintaining strong and vibrant communities and the associated promotion of health and well-being. Open space for recreation and sport can also deliver a number of Green Infrastructure objectives, often simultaneously.

**20.11** There is a wide range of types of open space across Wyre Forest; for example, playing fields, recreation grounds, allotments, cemeteries, parks and amenity green space. They are all part of and contribute to the Green Infrastructure both within and outside settlements. Some open space may not specifically be recognised for biodiversity value but will contain elements that will need to be considered when valuing green space. Other open spaces have high ecological or landscape value and are protected elsewhere in the Plan, e.g. Strategic Green Infrastructure (Policy 14) and Biodiversity & Geodiversity (Policy 11D and 11E).

**20.12** The Policies Map identifies the Open Space sites from the Wyre Forest Open Space, Built Facilities and Playing Pitch Strategies. Policy 20B aims to protect the open spaces that are identified on the Policies Map, together with numerous incidental open spaces too small to include but that nonetheless contribute to the quality and character of their local areas. These small local spaces are often valued and used heavily by local communities and are therefore worthy of policy protection. Whilst most open spaces are publicly accessible, some are in private ownership, although they nonetheless perform valuable functions such as contributing to biodiversity, the character of the area and providing a sense of openness and space.

### **Open Space, Sports Pitches and Outdoor Community Uses in Housing Development**

**20.13** The District currently has 98 football pitches, 15 rugby pitches of which 10 are senior, 1 junior pitch and 4 mini pitches, 2 hockey pitches and 11 cricket fields. Additionally Wyre Forest District currently has 2 full size 3G pitches and 6 small 3G pitches.

#### **Policy 20C - Provision for Open Space, Sports Pitches and Outdoor Community Uses in Housing Development**

The Council will require any major development, subject to viability requirements designated by the NPPF, to make provision in accordance with the following principles:

- i. On-site provision which meets local needs for open space, sport and play;
- ii. Off-site contributions instead of an on-site contribution where it can be demonstrated that on-site provision is not feasible or viable;
- iii. Contributions towards the enhancement and creation of new areas of open space and/or sports facilities where a local deficiency has been identified and/or where the development will lead to a deficiency;
- iv. Open space in the most accessible possible locations including access by cycle routes and provision for walking and cycling;
- v. Play and recreation spaces for children and young people including the provision of play equipment for special needs children;
- vi. Creation of historic or environmental interpretation features;
- vii. Street trees (where appropriate and subject to long-term maintenance arrangements).

The Council will apply the following standards to new development:

- Development proposals for 10 or more dwellings should make provision for open Space and outdoor community uses, as set out in Table 20.0.1 (see below), together with secure arrangements for its long-term management and on-going maintenance by the

developer, Town Council, Parish Council, or other community organisation. Enhancing accessibility to these open spaces, e.g. through improvements to the Rights of Way Network, is strongly encouraged.

- The Council will require developers to establish a mechanism by which public open space will be maintained to an agreed standard. The mechanism must be secured and in place prior to commencement and it must be operational prior to occupation of no more than 80% of the development.
- The total amount of green open space will be within the overall amount of Green Infrastructure required by Policy 14. In addition to Table 20.0.1, the precise amount, type and form of outdoor community use will be informed by local evidence e.g. Neighbourhood Plans and Playing Pitch Strategy.
- New open space should be designed to be multi-functional and be of a size, type and quality to meet site, local and strategic needs. Where new sport and recreation facilities are provided as part of a development, they will be created in accordance with Sport England technical standards. Where replacement facilities are being provided, equivalent quality and quantity or greater will be required.
- Ongoing management and maintenance of public open space, sports, play, leisure and recreation facilities must be considered at the outset of the planning and design of a development and this should inform the type, amount and layout of provision proposed.
- Where a development is in proximity to an existing community facility, green space or biodiversity asset, the developer will need to enhance or buffer the existing asset to mitigate any increase in demand put on that asset by the new development.
- The development will be required to address deficiencies in the provision of play and recreation open spaces. Proposals must provide an assessment which demonstrates how they have responded to and addressed the issues and requirements of the Council's strategies as identified in the Open Space audit, Playing Pitch Strategy and other relevant strategies and their subsequent updates.

On-site provision of open space will have regard to the following accessibility standards:

- Children's Play Space (safe walking distances to dwellings):
  - i. Local Area for Play (LAP) - within 100m.
  - ii. Local Equipped Area for Play (LEAP) - within 400m.
  - iii. Neighbourhood Equipped Area for Play (NEAP) - within 1km.
- Playing Pitches: within 1.2km of dwellings or within 20 minutes drive in the rural areas of the District.

Table 20.0.1 Open Space Requirements

Type of Open Space	Quantity standard (hectares per 1000 population)	Total current hectares	Open space requirement for District 2016-2036 (hectares)
Parks and Gardens	0.56	56.20	6.92
Natural and Semi Natural	4.26	426.22	52.67
Amenity Green Space	0.78	77.81	9.64
Allotments	0.18	17.6	2.23
Provision for Children and Young People	0.12	12.17	1.48

### Reasoned Justification

**20.14** The NPPF advocates improving the conditions in which people live and take their leisure. A high quality built environment, including the spaces within it, plays an important social role in the delivery of sustainable development. The NPPF also requires local planning authorities to plan positively for the provision of community facilities and spaces. This Policy should be read in conjunction with Policy 12 (Strategic Infrastructure), Policy 14 (Strategic Green Infrastructure), and the Infrastructure Delivery Plan (IDP).

**20.15** The Council requires major development to provide and/or contribute to the provision of multi-functional open space which serves and meets the needs of the development as well as local needs, including those with disabilities and wider needs subject to viability. Need for open space, sport and recreational facilities must be assessed to determine what provision is needed (NPPF paragraph 96).

**20.16** New developments introduce new demands on public open space. This can include the need for more open space, improving the performance of existing open space or the provision of new types of open space.

**20.17** It is considered that the provision of new functional open space and other facilities is necessary in order to achieve active, healthy and integrated communities. The type and size of the residential proposal will also be a factor in determining the make-up of the various community use typologies. Over-provision in any single typology does not negate the need to provide for other typologies. In addition to parks, open spaces and recreation areas, the provision of amenity space is an important aspect of the urban environment. The increasing emphasis on higher density residential development raises the importance of outdoor amenity space as an integral consideration in the design of new developments. It provides opportunities for play, outdoor relaxation and social interaction. The continued provision of adequate children's play space is considered to be an important component for new development.

**20.18** The Wyre Forest District Open Space, Built Facilities and Playing Pitch Strategies as well as national guidance, will be used to identify any shortfall in the provision of these facilities and will identify what community sports assets need protecting and which need improving. The Playing Pitch Strategy requires the District to provide two additional 3G pitches in the plan period. The Playing Pitch Strategy document will be updated over the plan period to remain valid, and subsequently the requirements for sport pitches may therefore change.

**20.19** This strategy identifies quantitative and qualitative deficits in these facilities. It will be used to inform **either** the necessary level of developer contribution to be made towards new or upgraded existing provision **or** the funding of qualitative improvements rather than quantitative provision to meet demand created through new residential development, as informed by the Planning Obligations SPD, **or** the necessity to provide on-site facilities.

**21.1** Wyre Forest District Council wants to encourage business into the District and for those already in the District to be able to expand and adapt to changing markets. The District needs to be able to adapt to new and flexible working practices such as homeworking and live/work units to ensure that there are a wide range of employment opportunities within the District in conformity with NPPF paragraph 81.

**21.2** Wyre Forest District Council commissioned an Employment Land Review (ELR) for the District which was published June 2016; this was updated in October 2018. It assessed economic development needs across the District objectively in line with the revised NPPF and Planning Practice Guidance. The report found that the majority of businesses within Wyre Forest District (89.6%) are micro businesses which mean that they employ 0-9 employees; this figure is slightly higher than the figure for West Midlands (89.1%) or Great Britain (89.5%). Wyre Forest District has seen an increase of micro firms within the District of 1.9% since 2015, this is more than the increase seen in the West Midlands (1.4%) or for Great Britain (1.2%). Large firms employing in excess of 250 employees only account for 0.3% of businesses within the District versus 0.4% in the West Midlands and Great Britain. The updated 2018 Employment Land Review identified the need for at least an additional 29 hectares of employment land which includes employment generating uses such as nursing homes. Table 10.0.1 in section 10 A Good Place to do Business, shows sites allocated for employment uses. The employment allocation sites are also shown on the Policies Map and site specific policies can be found in Part C of the Plan.

**21.3** The South Kidderminster Enterprise Park area is a key employment and regeneration focus for Wyre Forest District. To help encourage business growth within the district a Local Development Order (LDO) for this area was implemented in August 2012. The LDO introduced permitted development to any site within the boundaries of the South Kidderminster Enterprise Park. The LDO was revised for a further 3 years in 2015. Owing to the success of the LDO, it has been renewed for a further three years running until August 2021. The LDO has been used by 17 businesses and developments and has provided circa £25 million of economic investment since its initial adoption in 2012. It is hoped that it will continue to attract inward investment to the area in the future.

**21.4** Wyre Forest District is located within two Local Enterprise Partnerships (LEPs): Worcestershire LEP and Greater Birmingham and Solihull LEP. The involvement of the District in both Partnerships reflects the economic geography of an area that has strong ties with both the county in which it is located, Worcestershire, as well as the larger urban conurbation of Birmingham and its surrounding areas.

**21.5** It is important that the Council's planning documents, wherever possible, reflect the aims and ambitions of the LEPs ensuring that the District continues to be a place for businesses to operate and to grow.

**21.6** Over the past few years there has been a rise in the levels of home working in the UK. According to the Office for National Statistics (ONS) the number of home workers in the UK amounted to 4.2 million in the first three months of 2014, equivalent to 13.9% of the total workforce. Wyre Forest has around 5,300 workers who work mainly at or from home, which is equivalent to the national rate of 13.9% of the workplace population.

**Summary of Preferred Options responses:**

- Employment uses on previously developed land should be prioritised.
- Support for employment policies in the Preferred Options document.
- More support should be shown by the Local Authority to the agricultural sector.
- Is more employment land required? Should it be allocated for residential?
- Concern that employment units will not be filled as ones at Easter Park took a long time to be occupied.

**Summary of Issues and Options Responses**

- Support for brownfield sites to be developed for employment that are accessible from residential areas, accessible by public transport and provide suitable parking.
- Support for sites that have been allocated for employment uses and have not come forward to be used for alternative uses.
- Requirement for small units and start-up units.
- General support for the reuse of existing rural buildings for employment uses such as farm diversification.

**Employment Development**

**Policy 21A - Economic Development**

The employment allocation sites are shown on the Policies Map and are safeguarded for employment use in Policy 10A.

- In addition to sites allocated specifically for employment uses, the provision of employment land and the conversion of existing buildings to support job creation throughout the District will be supported if they are in conformity with other policies in the Plan and providing the development supports existing businesses or new enterprises of a scale appropriate to the location.

- Planning permission for the change of use to alternative uses for land or buildings which are allocated for employment use (as shown on the Policies Map), or were last used for employment purposes within the B1, B2 and/or B8 use classes will only be granted where:
  - A financial appraisal demonstrates that redevelopment for any employment generating use is unviable and is unlikely to achieve viability within 5 years; and
  - Details are provided of active marketing of the premises / land for at least 12 months and appropriate to the prevailing market conditions; and/or
  - The proposed use would be compatible with adjacent land uses and not prejudice the amenity, lawful operation, viability or future development of other businesses.

Where the above criteria are met and there is no reasonable prospect of a site being used for employment use, applications for alternative uses of land or buildings will be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. They must also be in accordance with other policies within this Plan.

#### **Economic Development outside Allocated Areas**

- Proposals for economic development outside of the allocated areas will be prioritised following the sequential approach of:
  - Previously developed sites;
  - Greenfield Infill sites within a settlement outside the Green Belt;
  - Greenfield Sites adjacent to a settlement outside the Green Belt.
- They will be assessed on their merits and be fully in accordance with other policies within this Plan.

#### **Hazardous Substances**

- Proposals for development or activities involving hazardous substances, or development adjoining an area where hazardous substances already exist, will only be permitted where the relevant authorities are satisfied that the proposals are acceptable. Where necessary, appropriate measures to protect the public and environment will be required.

#### **Waste Developments on Employment Land**

- Development for waste facilities will also be considered favourably within the designated employment locations, subject to proposals being in conformity with the other policies in the Plan and the Waste Core Strategy for Worcestershire.

### Reasoned Justification

**21.7** To achieve sustainable growth within the District we need to create opportunities for people to work. Wyre Forest District Council aims to ensure that the right amount of suitable land is available to attract business to the District and enable existing businesses to grow. In Part C of the Local Plan, there are site specific policies for the sites allocated for employment uses.

**21.8** Proposals involving hazardous substances will need to be carefully assessed. Any decision will be made having regard to the advice of the Health and Safety Executive, the degree of risk and the likely hazard or consequences of an accident occurring. Proposals for development in close proximity to existing hazardous installations will also be carefully assessed to ensure that these proposals are safe and acceptable with the appropriate authorities.

**21.9** The Waste Core Strategy for Worcestershire was adopted in November 2012 and forms part of the statutory Development Plan for the District. The Waste Core Strategy sets out a long term vision for waste management within Worcestershire and outlines areas of land that may be suitable for development of new facilities. Waste management facilities are often akin to business or industrial activities and, when directed to the right locations, they can provide economic opportunities without having adverse impacts on their surroundings. Therefore, it is considered appropriate to allow for the principle of development of waste management facilities on allocated employment sites, subject to the proposals being in line with the other policies included in the Local Development Plan and the Waste Core Strategy for Worcestershire.

### Rural Employment

#### Policy 21B - Rural Employment

- Agriculture is an important industry in rural areas within Wyre Forest District both for the production of food and for employment. Support will be given for the sustainable growth and development of agricultural and other rural businesses that are in conformity with other policies in the plan.
- To help promote rural regeneration existing employment sites in rural areas that are currently or were last used for B1, B2, B8, tourism, leisure and/or recreation related purposes will be safeguarded for the existing use during the plan period, unless it has been demonstrated that the site has been actively marketed for a period of at least 12 months and that it is no longer viable.

- The expansion of existing employment sites in rural areas will be supported where it has been demonstrated that intensification of the existing site is not viable or practical subject to compliance with other relevant policies.
- The redevelopment of existing previously developed land, outside the Green Belt, for economic development purposes will be allowed, where this would result in a more acceptable, sustainable and better designed development than would be achieved through conversion or reuse.
- Proposals to diversify farm businesses for employment, tourism, leisure and recreation uses will be permitted providing:
  - The proposed new use does not detract from or prejudice the existing agricultural undertaking or its future operation.
  - The scale of activities associated with the proposed development is appropriate to the rural character of the area.
  - Wherever possible existing buildings are used to reduce the need for additional built development.
  - The proposed new use does not cause an unacceptable rise in vehicular movements that is inappropriate by virtue of disturbance to the character of the area or amenity of any neighbouring area.

### Reasoned Justification

**21.10** The provision of new rural employment sites, especially the use of previously developed land and sites that physically relate well to an existing settlement, should be considered favourably if it is not harmful to the integrity of the settlement or landscape character. (NPPF paragraph 83).

**21.11** Employment sites that fall vacant should be actively marketed before their conversion to an alternative use such as residential and the consequent loss of a facility/service providing important local jobs. The marketing exercise will need to have regard to the nature and scale of the site and buildings and the prevailing economic conditions.

**21.12** Rural employment sites not only provide local employment, they also provide opportunities for new investment and rejuvenation through intensification or re-use.

**21.13** Over the past few years, changes to traditional farming methods have meant that many farms need to diversify to ensure their survival. Diversification should be encouraged but agricultural uses should still remain as the main focus of the farm unit.

## Live work units

### Policy 21C - Live Work Units

1. Proposals for live/work units will be permitted in sustainable, appropriate locations within the settlement boundary. The proposal will need to be justified and where they involve the re-use of a rural building be in accordance with Rural Conversion policies and other policies within the Plan.
2. New developments including replacement buildings for live/work units will be permitted in sustainable, appropriate locations within the settlement boundary. The proposal will need to be justified and be in accordance with other policies within the Plan and that the following criteria are met:
  - They are located on Previously Developed Land;
    - They do not have an adverse impact on the character, landscape or wildlife of the area;
    - They do not constitute inappropriate development in the Green Belt;
    - Suitable access arrangements can be made without the need for extensive new access roads.
3. All Live/Work proposals must also ensure that:
  - The work element is restricted to uses considered appropriate to the location, in rural areas this being use class B1, B2 and appropriate rural employment uses where there are no adverse impacts on surrounding properties;
  - The workspace is designed to be separate from the dwelling;
  - The emphasis is on the work element with residential use ancillary. This should be reflected in the split of floorspace with at least 60% afforded to the workspace and no more than 40% for residential;
  - The workspace must be constructed and available for occupation and in use before the residential element of the scheme is occupied.

Normally the residential accommodation should contain no more than three bedrooms, and residential and work spaces should have separate entrances and toilet facilities.

### Reasoned Justification

**21.14** There has been an increase in self-employment and home working and increasing use of technology amongst many growth sectors. It is therefore important that Wyre Forest District Council monitors and responds to these changing preferences, to ensure that business needs can be met within the District.

**21.15** Live work units differ from homeworking in that homeworking uses a small proportion of a residential unit for generally office work whilst live work units are a business being run from the same place that the worker resides. The employment aspect is the main use with the residential area as an ancillary use.

**21.16** Live work units can make use of redundant rural buildings and afford opportunities for farm diversification or they may be purpose built on previously developed land. The emphasis should be on the work element of the building but the two uses should be separate and should not have an adverse effect on the surrounding area. Policy criteria need to be set to ensure that proposals are genuinely intended for employment purposes. The approved development may be controlled by planning conditions or a legal obligation governing the use of the premises and other relevant matters such as the number of non-resident employees who can work at the premises. The removal of permitted development rights for change of use of all or part of the premises or for residential extensions may also be considered appropriate. The size of the business area must be justified to ensure that a larger than necessary business area is not constructed just to enable a larger dwelling to be built.

## Offices

### Policy 21D – Offices

- Office accommodation will be permitted where it does not cause an adverse effect on the built, historic and natural environment and will be focussed on the three town centres and allocated employment areas. The main town centres should be considered first, then edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- Small scale offices of less than 500sqm in rural areas outside the Green Belt will also be supported where appropriate.

## Reasoned Justification

**21.17** The majority of offices within the District are located in Kidderminster. The demand for office accommodation tends to be from small, mainly professional, companies and businesses wanting small office accommodation. The demand is generally local as the market does not attract a high number of occupiers from outside of the District. The area faces competition from larger conurbations such as Birmingham and locations in proximity to the strategic motorway network.

**21.18** In Wyre Forest District the majority of offices tend to be small units above retail units in the town centre, ancillary office units on industrial estates or buildings that have been converted to offices such as Elgar House. Very few offices are purpose built. If the District had a supply of offices that were accessible and had parking they would achieve a higher rental value and could attract inward investment.

**21.19** The figure of less than 500 sqm used for small scale offices is the figure used for development in The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended.

**21.20** Loss of office floorspace has an adverse effect on business, employment and the character of the District and will therefore be resisted where possible.

**21.21** Some low cost offices are required to meet the requirements of the voluntary sector and start up businesses.

**22.1** Town centres are crucial to the social, economic and environmental wellbeing of the District. The concentration of a range of goods, services and facilities in one area creates a centre for communities and enables people to make one trip for many reasons. The District's settlement hierarchy of towns are Kidderminster, Stourport-on-Severn and Bewdley (see Policy 6B). It is this hierarchy that provides the basis for identifying the locations for new retail, leisure and commercial development. Further retail development should be directed towards Kidderminster, Stourport-on-Severn and Bewdley.

**22.2** The main retail centre is Kidderminster which has the widest choice of retail facilities within the District. Since the development of Weavers Wharf (opened 2005), the shopping centre has moved westwards away from the traditional town centre which was based around Worcester Street, High Street and Vicar Street. However town centres have changed and are still changing as retail patterns have altered with the increase in internet shopping and click and collect. This means that Kidderminster town centre needs to change its role from mainly retail to a variety of additional uses that will include residential, recreation, leisure, employment and offices to ensure that the town centre is vibrant.

**22.3** In 2016 Wyre Forest District Council commissioned a Retail and Commercial Leisure Needs Study (Boyer 2016). The conclusion of this study was that Kidderminster is the main shopping centre in the District, however there is an imbalance created by the Weavers Wharf development which is the dominant element within the town centre. Due to this there is a need to regenerate the eastern part of the town centre. Consequent to the Retail report by Boyer the primary shopping area and primary and secondary shopping frontage areas in Kidderminster have been revised owing to the impact of the Weavers Wharf development. This is shown on the Kidderminster Retail map in Appendix B.

**22.4** Stourport-on-Severn offers a range of retail facilities and services which include supermarkets as well as individual specialist shops to serve the town with more retail facilities in Kidderminster which is situated 3 miles away.

**22.5** Bewdley is the smallest of the towns within the District and its retailing function reflects its size and role within the area. The retail core is compact and focussed on Load Street. Bewdley provides an important top-up shopping destination with a range of convenience goods and services.

### **Summary of Preferred Options Responses**

- Kidderminster has many empty shops and empty buildings, the town centre needs change.
- Changes in retailing mean alternative uses should be considered for Kidderminster town centre by bringing alternative services into the town centre will encourage the users to also shop there.
- Change empty buildings above shops into residential in Kidderminster town centre.
- Support for limit of use classes in Primary Shopping Frontage.

- Increased number of takeaways has increased amount of litter.
- Vacant retail units, no evidence new retail units will be occupied.
- Retail decline needs to be managed productively.

**Summary of Issues and Options Responses**

- General support for the redevelopment of Kidderminster town centre to make it more attractive, including making more use of the canal and to support a mix of specialist shops and larger stores.
- General support for the redevelopment of traditional retail areas to include a variety of uses including retail, residential and leisure.
- General support for the retention of the existing shopping areas in Stourport-on-Severn and Bewdley.

**Town Centre Development**

**Policy 22A - Town Centre development**

- Large scale retail development (2,500sqm net and above) and commercial or leisure uses should be targeted towards Kidderminster as the strategic centre of the District followed by Stourport-on-Severn and Bewdley in a sequential approach. Proposals for new retail development (of more than 280sqm net), or proposals regarding the removal of restrictive retail conditions, (condition that restricts retail use) will only be permitted where a sequential approach has been followed and it is demonstrated that:
  - It is within the Primary Shopping Area.
  - If edge-of-centre, that the proposals cannot be accommodated within the Primary Shopping Area.
- Support will be given to proposals that safeguard, maintain and enhance the vitality and viability of the existing retail centres throughout the District without causing adverse effects on the built and natural environment and that are of a scale that is appropriate to its location.
- In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential. Proposals must demonstrate that the building is fully used avoiding vacant floors above shops.

Proposals to introduce residential development above ground floor within the Primary Shopping Area will be supported. Within secondary shopping frontages, residential development at ground floor will be considered in accordance with other policies within the plan and on their individual merits. This will help to improve the vitality of the centres without compromising the core retail function of the towns.

- Support will be given for the appropriate development for the regeneration of the eastern gateway area of Kidderminster town centre.
- Within the defined Primary Shopping Frontage development proposals for retail use at ground floor (A1-A5) will be permitted where:
  - The scale and type of development proposed is directly related to the role and function of the centre and its catchment area and it contributes to the provision of a safe environment.
  - There would be no adverse impact on the vitality and viability of the centre or other centres.
  - They provide an active frontage and are open for business during the day.
- Proposals for development within the Primary Shopping Frontage area must not result in an adverse cluster of non-retail uses at ground floor level or unduly fragment the retail area.

### **Reasoned Justification**

**22.6** The NPPF (paragraph 85) states that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. The NPPF requires Local Planning Authorities to define a network and hierarchy of town centres and promote their vitality and viability, allowing them to grow and diversify allowing a mix of uses including residential. Town centres and primary shopping areas should be defined with a range of uses in each centre. Sites should be allocated to meet likely need, where town centre sites are not available then edge of centre sites should be considered.

**22.7** Town centres are extremely important to communities and Wyre Forest District Council wishes to support town centre viability and vitality and to pursue policies that promote town centre development creating thriving town centres.

**22.8** Kidderminster, being at the top of the retail hierarchy, will be the preferred location for major leisure, office and retail developments and other uses that attract large numbers of people. Other centres are suitable for day-to-day food and non-food shopping, small-scale leisure uses and local service and facility provision (NPPF paragraph 85).

**22.9** The retail sector and town centres are undergoing a period of significant change due to the continuing popularity and convenience provided by out-of-town facilities and the increasing adoption of online and click and collect shopping. Therefore, alternative uses such as leisure and residential within town centres may add to the viability and vitality.

**22.10** Retail development should be focussed on existing centres in order to strengthen and, where necessary, regenerate them. Wherever possible, growth should be accommodated by more efficient use of land and buildings within existing centres. This approach will help maintain the historic character of town centres and provides opportunities to minimise the consumption of non-renewable resources by reusing existing buildings and reducing the need to travel to out-of-centre retail parks.

**22.11** The Primary Shopping Area is a defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are contiguous and closely related to the primary shopping frontage). Primary frontages are likely to include a high proportion of retail uses. Secondary frontages provide greater opportunities for a diversity of uses and often provide complementary uses to the core retail function that exists within the primary frontage. Maps showing the primary shopping area and primary and secondary shopping frontages for Kidderminster, Stourport-on-Severn and Bewdley are to be found in Appendix B.

**22.12** Proposals involving a change of use of ground floor premises in the Primary Shopping Frontage must complement the retail offer and must not lead to an over dominance of non-retail uses or 'dead' frontage, which would detract from the overall retail experience. In assessing whether a proposal will result in an adverse cluster of non-retail (A1) uses, regard will be had to the use of three units either side of the proposed development. Where a proposal would result in more than two units of the seven being for non-retail (A1) uses it will not be permitted. In order to prevent the fragmentation of the shopping frontage, no more than two non-retail (A1) uses should be adjacent to each other.

**22.13** Throughout the retail section of the Plan a number of policies have regard to a threshold of 280sqm (net)<sup>(22)</sup>. This permissive approach towards small-scale development is a local initiative to provide flexibility to existing retailers and to promote appropriate community shopping facilities. To avoid duplication this point has not been added into each reasoned justification but is relevant to each.

**22.14** Stourport-on-Severn and Bewdley are classed as market towns. Stourport-on-Severn offers leisure and shopping facilities to its residents and its canal and riverside assets continue to be a key visitor attraction. Its public realm is enhanced through the restoration of its unique heritage including the canal basins. Bewdley remains a thriving market town which meets the local community's needs. The town's Georgian historic character is preserved and it is a popular riverside destination.

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22 Net Floorspace: The area within the shop or store which is visible to the public and to which it has access, including fitting rooms, checkouts, the area in front of checkouts, serving counters and the area behind used by serving staff, areas occupied by retail concessionaires, customer services areas, and internal lobbies in which goods are displayed; but not including cafes and customer toilets

**22.15** The geography of the District means that Kidderminster is just 3 miles from each of the market towns. Therefore, the need for Bewdley and Stourport-on-Severn to provide facilities and services should be balanced with their proximity to Kidderminster and the services it provides in its function as the strategic centre of the District.

### **Out of Town Retail**

#### **Policy 22B - Edge of Centre and Out of Town development**

- Proposals for new, or an extension to existing, edge or out-of-centre retail, entertainment or leisure development in excess of 280 sq.m gross floorspace will be required to submit a sequential test and an impact assessment demonstrating that there would be no adverse impact on the vitality and viability of a town centre as a whole. The Council will refuse planning permission where there is evidence that proposals are likely to have significant adverse impacts on the vitality and viability of a town centre as a whole.
- Before out of centre sites are considered the sequential approach must demonstrate why there are no suitable or available sites within the Primary Shopping Area in the first instance and edge of centre sites in the second.

### **Reasoned Justification**

**22.16** When assessing applications for retail, leisure and office development at edge of centre and out of centre locations, paragraph 89 of the NPPF states that local planning authorities should require an impact assessment if the development is above the proportionate locally set floorspace threshold. The threshold of 280 sqm net is a permissive approach to small scale development. This is a local initiative to provide flexibility to existing retailers.

### **Neighbourhood and Village Centres**

**22.17** Local shops and other services play a vital role in promoting communities' sustainability by helping to meet everyday needs and reducing the need to travel. The Council is therefore keen to ensure that the loss of existing retail areas is resisted, where possible.

### **Change of use from retail to alternative uses**

#### **Policy 22C - Change of use from retail to alternative uses in local centres**

- Individual retail shops in local shopping centres will be safeguarded for A1 retail purposes, unless it has been demonstrated that the shop unit has been marketed for a minimum of one year and there is no realistic prospect of the unit being used for A1 retail purposes in the foreseeable future. Where this has been demonstrated, change of use from Class A1 retail will be accepted provided that:

- The use meets the needs of residents within the local neighbourhood;
- There are alternative shopping facilities for local residents within a reasonable distance.

## Local Shops

### Policy 22D - Local Shops

- Planning permission for new village and neighbourhood shops or the extension of existing facilities will be granted provided that the total floor space does not exceed 280sqm net and where possible parking can be provided.

## Reasoned Justification

**22.18** Local shops and shops in local centres provide convenience products often within walking distance. The loss of convenience retail facilities in a settlement or neighbourhood can have a serious impact upon people's quality of life and potentially harm the overall vitality of the community. With an increasing proportion of elderly people who may have reduced mobility levels, access to locally based retail services will become more important. In local centres, proposals that would result in a significant loss of facilities could also have a serious impact upon the vitality and viability of that centre as a whole due to their role in providing a range of facilities for the surrounding area.

## Other forms of Retailing – Specialist Retailing

**22.19** There are other forms of retailing that do not lend themselves to being sited within designated areas or neighbourhoods, yet they often make an important contribution to the local economy. It is important that the focus for new retailing remains in the most sustainable locations, following a sequential approach, but there is a recognition that other forms of retailing also need consideration. The following policy is therefore proposed to manage applications for 'specialist retailing'.

### Policy 22E - Specialist Retailing

- Retail developments within employment areas (factory outlets) will not be permitted unless they are small scale uses (not exceeding 280sqm net) related to or an ancillary part of a business use. Car showrooms and vehicle maintenance, repair and service centres will also be permitted on land allocated for B1, B2 and B8 purposes.

- Proposals for convenience retailing associated with petrol stations will be permitted where this is clearly an ancillary function to the main use, is for convenience goods and the floorspace does not exceed 280sqm net.
- Other forms of specialist retailing will be permitted where the retail element is ancillary to the main use. Extensions to existing operations should not lead to an increase in the amount of retail floorspace dedicated to the sale of comparison goods. Where necessary, the range of goods to be sold from the site may also be limited by condition.
- New or expanded farm shops, garden centres or petrol filling stations will be permitted in appropriate locations provided:
  - In the case of farm shops, the proposal would make use of redundant or under-used buildings and the range of goods to be sold is restricted to foodstuffs, plants and rural crafts produced locally.
  - The creation of new, or extensions to existing, garden centres or farm shops in the open countryside and unrelated to a settlement will only be permitted if the proposed development is ancillary to, and on the site of, an existing horticultural business or existing farming operation.
  - They do not constitute inappropriate development in the Green Belt.
  - In all cases parking should be provided to Worcestershire County Council standards.

### **Reasoned Justification**

**22.20** There are locations within the District where retail elements exist as an ancillary element of another use. This includes outlet shops in employment areas, petrol filling stations, garden centres, and farm shops. It is important that any future proposal remains ancillary to the existing use so as to not to undermine the primary role.

**22.21** With the loss of many traditional independent retail outlets, the operators of petrol stations have often provided for the convenience needs of their localities. However, the role that petrol filling stations play in providing retail facilities should be limited to a modest scale.

**22.22** Traditionally, many farms have sold produce grown on the farm to the general public, sometimes from farm buildings and in more recent years from 'farm shops'. Due to the potential impact of the development of farm shops, it is proposed that the role of the shops be limited to agricultural produce originating from the farming unit and its immediate environment. If non-local agricultural produce is required to be sold (for example to combat the issue of seasonality), then this should remain subsidiary to the sale of local agricultural produce. The sale of a wider range of goods not produced locally is considered to be inappropriate for farm shops.

**22.23** Garden centres were also established as an ancillary function to agricultural (horticultural) production. However, such has been the growth in the leisure sector that there are now national chains of garden centres, many of which are dedicated to the retail sale of plants and sundries and have little if any horticultural production capabilities. There is no reason as to why these facilities cannot be located within more urban areas. Where rural garden centres do exist, they often have a valuable role to play in the local economy. Nevertheless, in order to accord with the retail strategy and to preserve the openness and character of the rural landscape, the Council is keen to ensure such facilities remain predominantly ancillary to horticultural production.

### Food and Drink Retailing

#### Policy 22F - Food and Drink Retailing

- Development proposals involving the sale of food and drink must not have an adverse impact in terms of:
  - Residential amenity;
  - Pollution by virtue of litter, noise or odour;
  - Crime and Disorder;
  - Parking and highway safety

### Reasoned Justification

**22.24** Proposals specifically regarding food and drink bring their own issues and challenges. Proposals involving consumption on the premises can increase the levels of liveliness and vibrancy throughout the day and night. Whilst there may be problems associated with anti-social behaviour, such uses can also, conversely, add to the sense of security through ensuring maximum people presence and natural surveillance. The policy therefore seeks to ensure that premises for the sale of food and drink have due regard to community safety and local amenity.

#### Policy 22G Hot Food Takeaways

In all the District's centres, retail parades and all other areas, proposals for A5 uses will not be permitted where:

- They would result in two or more A5 uses adjacent to one another;

- Outside of designated centres, hot food takeaways will not be permitted where the proposal is within 400m of the boundary of a school.
- Development proposals involving hot food takeaways must not have an adverse impact in terms of:
  - i. Residential amenity;
  - ii. Pollution by virtue of litter, noise or odour;
  - iii. Crime and disorder
  - iv. Parking and highway safety
- Applications for A5 uses will, where it is deemed necessary, be required to include a health impact screening to assess whether a full health impact assessment is required (also see Policy 9 Health and Well being).

### Reasoned Justification

**22.25** Where high concentrations of hot-food <sup>(23)</sup>takeaways occur in the town centres, they can pose a serious threat to the local economic vitality and viability. It is not uncommon for hot food takeaway shops to locate outside of town centres and high concentrations exist along some of the key road corridors such as the Horsefair and Comberton Hill in Kidderminster. In addition to health issues and obesity levels, hot food takeaway shops are more likely to have a detrimental impact on amenity and on retail character and function of shopping centres. Such harmful impacts relate to increased incidence of litter, smells, crime and anti-social behaviour, noise and general disturbance, parking and traffic problems.

**22.26** Research indicates that the more overweight a person is and the earlier in life a person becomes overweight, the greater the impact on that person's health. It is therefore considered important to support the establishment of healthy eating habits from an early age and minimise the negative impacts of hot food takeaways on childhood health <sup>(24)</sup>

**22.27** Wyre Forest District has a higher rate of excess weight amongst reception class children compared to the Worcestershire and England average. The figures for year 6 children are also above national averages <sup>(25)</sup>. This prevalence also tends to be higher within areas characterised with high levels of socioeconomic deprivation <sup>(26)</sup>.

23 The food or any part of it is hot, if it is at a temperature that is above the ambient air temperature, at the time that it's provided to the customer (the precondition) and one or more of the following tests are satisfied i) It's provided to a customer in packaging that retains heat (whether or not the packaging was primarily designed for that purpose) or in any other packaging that is specifically designed for hot food; ii) It's been kept hot after being heated; iii) It's been heated to order; iv) It's been heated for the purposes of enabling it to be consumed hot.

24 Source LGA 2016 Tipping the scales case studies on the use of planning powers to limit hot food takeaways.

25 PHE Wyre Forest District Health Profile 2017 Revised April 2018

26 Public Health England (2017) Health matters: Obesity and the food environment

**22.28** Wyre Forest District Council considers that the location of hot food takeaways in close proximity to schools could lead to children consuming a greater amount of unhealthy food which would undermine initiatives to promote healthier diets, particularly in schools. The proliferation and proximity of hot food takeaways to schools is also of concern as the food they serve is mostly high in fat, salt and sugar. Healthier options, if available, are generally very limited. There is concern that the effect of fast food consumption on children's diets and eating behaviour can add to health problems related to obesity. A proliferation of hot food takeaways within walking distance of locations where children and young people congregate, including schools, youth centres and parks can be seen as a contributing factor to rising levels of childhood obesity.

**22.29** 400 metres is considered to be equivalent to a 10 minute walk when taking account of physical barriers, rather than as the crow flies. 400 metres distance is considered sufficient to deter school children from walking to takeaways during their lunch break or after school. <sup>(27)</sup>

**22.30** Policy 22F will be further expanded by the preparation of a Supplementary Planning Document (SPD) relating to Health (as per Policy 9).

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27 Source NHS Healthy Urban Development.

**23.1** Wyre Forest District Council recognises the importance of tourism and the contribution it can make to the local economy. It supports rural tourism and leisure developments that respect the character of the countryside in conformity with NPPF paragraph 83. It also aims to protect the environmental quality of the area. The majority of visitors to Wyre Forest District are day visitors, with approximately 79% of those surveyed as part of the Wyre Forest District Visitor Survey 2015/2016 being day visitors. The remainder were made up of 13% overnight visitors and 7% visiting the District as part of a holiday but not staying within the District. Opportunities to encourage visitors to stay overnight or longer as well as facilities for all weathers, and encouraging visitors throughout the year will be encouraged.

#### **Summary of Preferred Options Responses**

- Tourism an important contributor to the local area.
- General support for the tourism policies.
- Road infrastructure needs to be improved around tourist attractions within the District.
- Kidderminster Harriers attracts many visitors and supporters into the District.
- Heritage within the District encourages tourism.
- Concern that the reduction in the number of public toilets will have a detrimental effect on tourism.
- Concern that there is not enough coach parking within the District for tourists.
- Additional development in the District especially on greenfield sites could reduce the attraction of the District as a tourist destination.

#### **Summary of Issues and Options Responses**

- Support for additional tourism to develop alongside existing tourist attractions but not to detract from them.
- Promote activities within the District such as walking, cycling and public art that will benefit local businesses.
- Intensification of existing tourist attractions but this should be measured against additional traffic and effect on amenity.
- Promote Rivers and Canal.
- Facilities required to encourage visitors to stay overnight.

**23.2** Tourism is an extremely important sector of the UK's economy. Within the Wyre Forest District, approximately 6.2% of jobs are related to the tourism industry. This figure is below the national average of 9.5%. Between 2009 and 2014 employment in tourism industries in the UK increased from 2.66 million to 2.97 million. The majority of tourism workers are permanent (89.57%) and the percentage of the workforce employed in the tourism industry has increased from 8.29% (2.50 million 2008) to 9.46% (2.97 million 2014) an increase of 18.78% over 6 years. Employment in the tourist industry is extremely important for younger workers with 26.4% of those aged between the ages of 16-24 being employed in the industry compared to only 10.5% in non tourist industries (Office for National Statistics – data from Annual Population survey 2008-2014 ONS). The income from tourism can help support the retention of existing services and facilities such as shops, public houses and restaurants.

**23.3** It is therefore important that future planning policy protects and enhances this aspect of the economy. Planning can have a significant impact on the tourism sector's ability to grow in response to future demand and to protect the natural and historic assets on which the industry is based. Within the District we need to provide adequate opportunities for growth, but also policies should be strong enough to prevent inappropriate development that would limit tourism potential and cause an adverse impact on the District.

## **Policy 23A - Supporting Major Tourist Attractions**

### **Severn Valley Railway (SVR)**

Proposals that enhance the role and function of the SVR (including visitor attractions and facilities and maintenance facilities subject to their impact on the surrounding landscape, biodiversity, heritage assets and the Green Belt) will be supported. Proposals to link the SVR with other sites along the route will be encouraged, especially at West Midland Safari and Leisure Park.

### **West Midland Safari and Leisure Park (WMSLP)**

The Council will consider favourably applications for major development at West Midland Safari and Leisure Park that are contained in the WMSLP masterplan or any other similar agreed document, where such development would:

- Upgrade and improve the viability of the attraction;
- Address the potential for heathland restoration and recreation;
- Be appropriate to its function as a major tourism destination;
- Make a positive contribution to the local economy; and
- Be acceptable taking into account the masterplan and its location within the Green Belt and the need to ensure compatibility with the local infrastructure network.

### **The Wyre Forest**

Future development proposals that enhance the tourism and leisure role of the Wyre Forest will be supported. Proposals will need to ensure that they respect the landscape, biodiversity and historic environment of this ancient woodland. Proposals that cause adverse impact to the area will not be permitted. Development proposals that link to the Forest, but are not necessarily within the Forest boundaries will also be supported, subject to proposals conforming to other policies within the plan and Natural England guidance on ancient woodland and veteran trees.

### **Arboreta**

There are two large arboreta located within the District at Upper Arley and Wolverley (Bodenham). Development proposals that enhance the tourism and leisure role of these areas will be supported. Proposals will need to ensure that they respect the landscape, biodiversity and historic environment of these areas and proposals that cause adverse impact on the environment will not be permitted.

## Reasoned Justification

**23.4** Wyre Forest District Council is committed to ensuring that the District's appeal as a tourist destination is retained and enhanced throughout the plan period. It is therefore important to provide support for tourist proposals by either the expansion of existing development or new developments.

**23.5** Nationally, tourism is generally an expanding part of the economy. However, locally there was a slight downturn in 2014 when both bed nights and expenditure were down 4%. It is estimated that within Wyre Forest District the number employed in tourism is around 2,155 and £121 million is spent in the local area as a result of tourism, taking into account multiplier effects. (Economic Impact of Tourism, Wyre Forest 2015)

## Severn Valley Railway

**23.6** The Severn Valley Railway (SVR) is a heritage railway line running steam trains between Kidderminster and Bridgnorth (in Shropshire), a distance of 16 miles. The railway is not currently a commercial line but provides a genuine draw for visitors and enthusiasts alike. The potential exists to open the line to commercial services in the future. The route of the railway closely follows the course of the River Severn for most of its journey. Kidderminster Railway Museum houses a vast range of railway artefacts, most of which date back to the days of steam travel.

**23.7** The route is now a major national and international tourist attraction. During 2016 over 250,000 passengers travelled on SVR (source SVR website). Given the SVR's potential impact on the District, it is considered important to provide a flexible policy framework that safeguards the existing railway operations whilst providing support for additional development proposals.

**23.8** The line of the SVR runs through the District and therefore support will be given to proposals to link this route with other sites that lie adjacent to the tracks where additional benefit in terms of sustainable transport and improving the tourism offer can be realised. The SVR is a key attraction for tourists and provides an undeniable economic draw into the District. The continued support for operations along the railway is provided within this policy, recognising the important role that the railway provides as both a defining feature of the landscape and the economic impact that it brings.

## West Midland Safari and Leisure Park (WMSLP)

**23.9** WMSLP is one of the largest tourist attractions in Worcestershire, and has been in operation for over 35 years. As well as the major Safari Park, it contains one of the UK's leading and longest established inland amusement parks, with over 30 rides catering for the family market, and is also a major events venue. The safari park and leisure park attracts 750,000 visitors a year and employs 82 year round staff plus a further 395 seasonal staff. The company spends several million pounds each year with local and regional suppliers. Its payroll is a substantial, multi-million pound sum which goes directly to the local economy as WMSLP primarily recruits from the local area.

**23.10** A masterplan covering the whole of the West Midland Safari and Leisure Park was approved by Wyre Forest District Council in 2013. The masterplan provides a framework for considering future development of the site, to ensure that development takes account of the

potential wider impact it may have. The focus of the masterplan is the future development of a hotel, conference centre and waterpark. In April 2016 full planning permission was granted for a water park as well as outline approval for a hotel, conference centre and spa, however construction work has not yet started. It is hoped that visitors to the safari park will extend their stay to more than a day visit. The conference centre will be important to the District for business visitors who spend more per head in the District than tourist visitors.

**23.11** In order to understand more fully the impact that the WMSLP has on the District, a study was carried out by Amion Consulting in 2011 which focussed on the potential economic impact of the Park. The study looked at how proposed redevelopment at the Park would impact on the local economy. The conclusions of the study were that proposed improvements to the Park would help to drive the development of the visitor economy, enable business growth and create new employment opportunities, as well as building on an existing local asset. The study identified that redevelopment at the Park has the potential to generate significant net additional local jobs and economic activity.

**23.12** The WMSLP undoubtedly has a large impact on the economy of the District, with the potential for this impact to grow further. However, future expansion or redevelopment of the Park is constrained by the Green Belt designation. The site is therefore identified as a Previously Developed Site in the Green Belt (Policy 35).

**23.13** There are competing priorities in planning policy terms within this location and the Council is seeking to achieve a balanced approach which maintains the identity of Bewdley along with the essence of the Green Belt whilst providing some flexibility to enable one of the District's key tourist attractions and employers to develop in a sustainable and appropriate manner. Unless the Park can continue to introduce new attractions and complementary development, the Park's contribution to the local economy will be restricted.

**23.14** In recognition of the valuable role which WMSLP plays in the region's tourism industry, and to help secure its long term future as a major tourist attraction, the Council will support the ongoing enhancement and improvement of the WMSLP as a major tourism destination, subject to other policies being adhered to (including Green Belt policies).

## The Wyre Forest

**23.15** This ancient woodland is a major attraction for tourists and residents of the District alike. Situated to the west of the District, the Forest offers visitors a range of woodland walks and trails amongst beautiful ancient oak woodland and conifer plantation together with an arboretum in the forest close to the 'Whitty Pear'. The forest now stretches to approximately 6,000 acres (although not all of this lies within Wyre Forest District). It is one of the largest remaining ancient woodlands in Britain and much of the area is designated as a Site of Special Scientific Interest (SSSI) with many rare species of flora and fauna being found there.

**23.16** The Forest includes a visitor centre and a recently developed Community Discovery Centre, providing a magnet for visitors to the Forest. A high wire course within the Forest, run by Go Ape, is situated near to the visitor centre. These facilities provide an important tourism offer and enable people to enjoy this ancient woodland. The Forest also helps to improve the health and wellbeing of the District's population by offering walks and trails to support all abilities.

**23.17** Natural England have produced guidance on ancient woodland <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences> Therefore, it is of vital importance to the future development of the attraction and the area as a whole, that any proposals respect the special characteristics of the area and do not cause harm to the main reason that people visit the area in the first place, the enjoyment of the Forest itself.

### Arboreta

**23.18** The District has two large Arboreta that perform a tourism function, as well as being important natural habitats. Arley Arboretum boasts more than 300 species of trees in formal and informal plantings and gardens. Bodenham Arboretum contains 3,000 species of trees and shrubs from all over the world and its 156 acres contains mature woodland, specimen trees and shrubs and two acres of pools and lakes. The continued operation of these tourist attractions may require future development proposals to come forward. Therefore, the policy framework allows for development to be considered, subject to the proposals not causing an adverse impact on the environment, which is the main draw for tourists.

#### Policy 23B - Supporting Tourist Attractions

Proposals for the development of other tourism related developments within Wyre Forest District will be permitted where the following criteria have been met:

- The development is compatible with the surrounding area and Green Belt policies together with other policies within the Plan.
- Provision should be made for suitable access and car parking, including where appropriate coach parking, and where possible be served by public transport, walking and cycling routes.
- Heritage assets and their setting should be conserved and, where appropriate, enhanced to encourage heritage tourism within the District.
- The natural environment and landscape should be enhanced and safeguarded.

### 23.19 Reasoned Justification

**23.20** Wyre Forest District provides a wide range of visitor attractions encompassing both the natural and the built environment. Tourism supports the economic viability and vitality of local businesses and provides uses for historic buildings.

**23.21** Visitor attractions can range from the main tourist attractions which were explored earlier in this chapter to other attractions such as Kidderminster Harriers, Bewdley Museum which attracts 200,000 visitors per annum, the Rivers Severn and Stour together with Stourport Riverside, the Worcestershire and Staffordshire Canal, Harvington Hall, Kidderminster Carpet Museum as well as various festivals.

**23.22** Access to attractions within the District should be as accessible to as many visitors as possible by public transport, walking and cycling routes and parking facilities. Currently there are few suitable coach parking areas. Additional suitable coach parking areas may encourage additional visitors to attractions.

**23.23** Within the District there are also 13 parks and gardens and 26 sites of natural and semi natural space. Around 6% of the District's land area is designated as Sites of Special Scientific Interest (SSSI) the Wyre Forest itself being the largest, others include Hurcott Pool and Woods and Puxton Marsh. The District also has Local Wildlife Sites and Local Nature Reserves (LNRs) which include Habberley Valley and Redstone Marsh. There are also a number of formal parks in the District which host events including Brinton Park. The policy supports proposals that are compatible with the character of the area.

### **Tourist and business visitor accommodation**

**23.24** Hotels, bed and breakfast and self catering accommodation make a particular contribution to the tourist industry in the District as they are an important element in the stock of tourist accommodation. In order for the business, conference and tourist market to grow, the District Council recognises the need for accommodation to cater for these demands, together with adequate parking.

**23.25** Where uses such as restaurants and pubs, are included in schemes, their impact on adjacent settlements will need to be assessed.

### **Policy 23C - Tourist Accommodation**

#### **Extension to Existing Tourist Accommodation**

- Proposals for extensions to existing tourist accommodation within settlements outside the Green Belt will be supported subject to their impact on the built, historic and natural environment.
- Proposals to existing tourist accommodation in the Green Belt should be of a scale that is not disproportionate to the size of the original building and design should be sympathetic to the original building.

#### **Conversion of Existing Dwellings to Tourist Accommodation**

- The conversion of dwellings to guest house or bed and breakfast accommodation will be acceptable subject to car parking provision being available, in accordance with adopted Worcestershire County Council Parking Standards and there being no undue disturbance to surrounding neighbours.

#### **Caravan and Camping Sites**

- Applications for further new mobile home or caravan sites within the District's rural areas will be resisted due to the collective impact which the existing sites have on the landscape (also see Policy 28B).

- Proposals for extensions and improvements to existing sites will be considered on their individual merits.
- **Grass Pitch Sites**
- Grass pitch sites designated for camping for recreation/holiday uses without new built facilities will be encouraged where the proposal does not conflict with any other policies. Grass pitch campsites will be encouraged to reuse existing buildings to provide facilities.