

Wyre Forest District Local Plan Pre-Submission Publication 2019

Consultation Response Form

2 September – 14 October 2019

REF OFFICE USE ONLY:

Representor number:

Representation number:

Plan reference:

Tests of soundness:

This form has two parts: **Part A** Personal Details and **Part B** Your Comments

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has issued this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the public examination. Using the form to submit your comments also means that you can register your interest in speaking at the examination.

Please read the guidance notes carefully before completing the form. If you responded to the last Pre-Submission consultation held in 2018, you do not have to respond again unless you want to add to them, withdraw them or make completely new comments.

Please fill in a separate part B for each issue/comments you wish to make.

Any additional sheets must be clearly referenced. This form can be submitted electronically. If hand writing, please write clearly in blue or black ink.

Consultation response forms can be completed and submitted online at www.wyreforestdc.gov.uk/localplanreview

Comments must be received by 5:00pm on 14 October 2019. Comments received after this time will not be considered.

Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mrs	
First Name	Angela	
Last Name	Preece	
Organisation (where relevant)	Churchill & Blakedown Parish Council	
Job title (where relevant)	Clerk	
Address – line 1	24 Holmes Orchard	
Address – line 2	Alveley	
Address – line 3	Shropshire	
Postcode	WV15 6NX	
E-mail Address	churchillandblakedownclerk@gmail.com	
Telephone Number		

Part B - Please use a separate sheet for each comment

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation

Churchill & Blakedown Parish Council

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

No

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

Yes, specific comments

b) If specific comments only, please specify which ones?

Expand Box / Continue on a separate sheet if necessary

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

No

Pre-Submission Local Plan (October 2018 version)

Yes

No

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

Policy

Other: e.g. Policies map,

6. Do you want to support/object/comment on this part of the Local Plan?:

Support
 Comment
 Object

7. Do you consider the Local Plan is:

a) Legally Compliant	Yes <input type="text"/>	No <input type="text" value="X"/>
b) Sound	Yes <input type="text"/>	No <input type="text" value="X"/>
c) Complies with the Duty to co-operate	Yes <input type="text"/>	No <input type="text" value="X"/>

8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared Justified Effective Consistent with National Policy

Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Planning/Highways

Please see attached Planning and Highways Advice received by The Parish Council which demonstrate why the Local Plan Amendments are not Positively Prepared, Justified, Effective, or Consistent with National policy

Documents attached from:

Simon Rees BSc, MA, MRTPI (Director), AddisonRees Planning Consultancy Ltd

John Lloyd BSc MSc (Transport Planning and Engineering) MCIHT

Legal Advice

The Parish Council has taken advice from Counsel at Landmark Chambers and makes the following representations:

- a. We write to object to the proposed amendment to the Wyre Forest District Local Plan Pre-Submission Publication Document agreed at the Wyre Forest District Council Cabinet at a meeting held on 16th July 2019 resulting in inclusion of an additional site policy, policy 36.6A related to land off Station Drive, Blakedown because as a result the plan is:
 - i. Unsound, in particular in that, applying the tests in NPPF paragraph 35:
 1. it is not consistent with national policy because there is no justification for the proposed loss of Green Belt consistent with National Policy, particularly NPPF section 13;
and
 2. it is not justified in that its inclusion means that the plan fails to represent an appropriate strategy which has taken into account the reasonable alternatives, and it is not based on proportionate evidence;

And the plan is further

- ii. not legally compliant, particularly in the failure to consider reasonable alternatives and to undertake sustainability appraisal or SEA of the significant effects and reasonable alternatives to policy 36.6A.

(i) *Plan Unsound; not consistent with NPPF*

b. As the local planning authority will be aware through its role in a leading case on Green Belt boundary alterations, it has been well established since at least *Carpets of Worth, Ltd v Wyre Forest DC* (1991) 62 P & CR 334 that removing a site from Green Belt requires that exceptional circumstances are fully evidenced: Purchas LJ held:

“... [O]nce a green belt has been established and approved as a result of all the normal statutory processes it must require exceptional circumstances rather than general planning concepts to justify an alteration. Whichever way the boundary is altered there must be serious prejudice one way or the other to the parties involved.”

This precedent is now reflected through paragraph 136 of the NPPF which provides:

Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

Paragraph 137 of the NPPF states:

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

We set out further below our objection that the local planning authority has not examined fully all other reasonable options.

That it has not done so is obvious: the decision to include the site was made in July well after examination of alternatives had been undertaken through the sustainability appraisal and no equivalent process has sought to repair the omission.

The failure to examine all reasonable alternatives offends against and is inconsistent with satisfying the exceptionality tests in the NPPF, and is also inconsistent with the requirements of the SEA Directive and the soundness tests.

- c. As to justification for the removal of the site from the green belt, we note that it is proposed that it be allocated for 50 houses.

Yet it is also notable that this is not proposed or justified on the basis of any need for housing being met at this site. Indeed, there is no evidence of urgent need for additional housing in Blakedown.

The 2016 Housing Need Survey for the Neighbourhood Plan showed that 7 families wanted affordable housing in the village at that time.

The Pre-Submission Plan suggests that 3 affordable units should be built each year. The private market is strong, and there is a regular supply of units for sale and rental. It took nearly 2 years for the houses in Gladstone Place to sell.

- d. Paragraph 138 of the NPPF provides that local planning authorities in preparing their plans:

... should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

No adequate work to comply with this aspect of national policy has been undertaken.

Failure to Consider reasonable alternatives:

(ii) Unsound

(iii) In breach of legal requirements

- e. We further object to the submission of the plan to examination with policy 3.36A included within because the failure to examine reasonable alternatives is inconsistent with the legal requirements imposed by the Strategic Environmental Assessment Directive (and implementing regulations) and further means that the plan cannot be found to be justified as being sound.

- f. The inclusion of this 2.7 hectare greenfield green belt site for development as a car park and 50 houses represents an allocation of greater significance for the Parish than any proposal within any previous iteration of the Plan.

It is a far more significant development than any proposed in the recent Neighbourhood Plan and is in conflict with that plan which itself has been through a lengthy process of consultation and approval.

The proposed allocation involves development of what has been established Green Belt over many years and a redrawing of that boundary.

It involves the development of more than 1 hectare of non-residential development and as such would exceed the threshold in schedule 2 to the EIA Regulations so as to constitute EIA development in the event it was progressed.

There has, to our knowledge, been no appropriate assessment of the implications of developing this site in relation to any protected habitats.

The development proposed by the 16 July 2019 decision is evidently likely to have significant effects on the environment.

- g. Despite its likely significant effects, the proposal advanced through policy 3.36A has not been the subject of sustainability appraisal or strategic environmental assessment or indeed any advance consultation even with our Parish Council. Consequently, the inclusion of the site at this late stage is unsound in that has not been properly justified.

Further, it is not in accordance with the legal requirements imposed by the strategic environmental assessment process:

- i. The likely significant effects of the proposal have not been appraised as required by the SEA process;
- ii. The site did not form part of the SA site appraisal;
- iii. None of the analyses considering alternatives or appraising candidate housing sites considered the site in question. Consequently, there has been no appraisal of alternatives on the equal basis required by the SEA Directive and by the SA process.

- h. The flaw in this process may be illustrated by the decision in *City and District Council of St Albans v Secretary of State for Communities and Local Government* [2009] EWHC 1280 (Admin); [2010] JPL 70, a challenge to a revision of the East of England Plan, a regional spatial strategy, was upheld. Mitting J concluded that there had not been *any* evaluation of alternatives to policies proposing the expansion of towns which would require the erosion of the Green Belt. Consequently, there had been a failure to comply with article 5(1) of the SEA Directive in relation to those particular policies so as to justify a quashing order holding at [21]-[22] (*emphasis supplied*):

21. Article 5.1 and Regulation 12(2) required that reasonable alternatives to the challenged policies be identified, described and evaluated *before the choice was made*. The environmental report produced by ERM did not attempt that task. It should have done so and the Secretary of State should not have decided to adopt the challenged policies until that had been done. The consequence of omitting to comply with the statutory requirement is demonstrated by the outcome. A decision

has been made to erode the metropolitan green belt in a sensitive area without alternatives to that erosion being considered. It is no answer to point to the requirement in the policies for green belt reviews to be undertaken at the local development framework stage. All that will do is to determine where within the district of the three towns erosion will occur, not whether it should occur there at all.

22. I therefore conclude that in the respects identified the challenged policies were outwith the appropriate power.

- i. Even leaving aside the failure to appraise the newly included allocation by policy 3.36A, the SEA process of the plan that was undertaken was cursory.
For the avoidance of doubt, there was no SEA of the Parish's Neighbourhood Plan because the proposals within it were not considered to have likely significant effects.
The proposed development would introduce a significant effect that would now require SEA.

- j. The submission documents which the local planning authority are required to submit to the Secretary of State include, by regulation 22(1)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 the sustainability report and by regulation 22(1)(c)(iv) how any representations made pursuant to regulation 18 have been taken into account.
Given that the sustainability report has not appraised the inclusion of this site allocation, that represents a significant legal flaw and an unsoundness in the plan which would be incapable of remedy at examination.

- k. Paragraph 32 of the NPPF advises- reflecting the extensive case law that:
Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. The plan should not be submitted to examination containing this proposal absent proper appraisal of reasonable alternatives to it.

- l. In the event that the plan is submitted without removing the allocation of the site and without proper appraisal of alternatives, the Parish Council will submit to the Inspector that the preparation of the plan has not complied with the legal requirements and is unsound and that the deficiencies are incapable of rectification within the examination process: this is not a matter upon which modifications could remedy the defects of process.

- m. Local planning authorities must set out in their Statement of Community Involvement how they will [engage communities on the preliminary stages of plan-making](#), specifically [survey stage](#) and [Local Development Scheme](#). This does not apply to those plans which have passed Regulation 18(1) stage of the Town and Country Planning (Local Planning) (England) Regulations 2012 before 31 July 2018 in respect of that particular plan/ Statement of Community Involvement.

The consultation process does not comply with section 4 of the Statement of Community Involvement.

- n. The local plan may also require a [Habitats Regulations Assessment](#) if it is considered likely to have significant effects on [habitats sites](#) or species located in the local planning authority's area or in its vicinity, as set out in the [Conservation of Habitats and Species Regulations 2017](#).

This site is likely to raise such issues under this regime but a [Habitats Regulations Assessment](#) has not been carried out.

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

a. The NPPG advises as follows:

What can the local planning authority do if they wish to make changes to the publication version of the plan before it is submitted for examination?

The local planning authority can include any changes in an addendum to the plan. Where the local planning authority intend the changes to be treated as part of the submitted plan, the addendum, together with any necessary sustainability appraisal of it, should be subject to further consultation (equivalent to the consultation on the publication version) before submission. Where such consultation has not taken place, their proposed changes will be considered by the Inspector during the examination process, but will not be treated as part of the submitted plan

- b. If the newly proposed allocation in policy 36.6A were omitted, that would allow the plan to safely proceed to examination because it would return the plan – in this material respect- to a form which has been the subject of sustainability appraisal. It is only the new inclusion of this site which engenders the need for sustainability appraisal at this point. Accordingly, the most commodious means of proceeding and of ensuring that the plan is examined in a form capable of adoption would be to remove the new allocation under Policy 36.6A.
- c. However, the alternative is to carry out a fresh sustainability appraisal process. In that event, there will need to be identification of reasonable alternatives: in order to comply with the SEA Directive and Regulations a local authority at least needs to turn its mind to the alternatives: [Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government \[2015\] EWCA Civ 681; \[2016\] PTSR 78](#). Where an authority fails to give any consideration at all to a matter which it is explicitly required by the SEA Directive to address, such as whether there are reasonable alternatives to the proposed policy, the court may conclude that there has been non-compliance with the Directive: see *R (Spurrier) v Secretary of State for Transport* [2019] EWHC 1070 (Admin). In [Heard v Broadland District Council \[2012\] EWHC 344 \(Admin\); \[2012\] Env LR 23](#) a plan was quashed by reason of the failure of the appraisal process to examine options other than the preferred option. An assessment needs to be made of whether the options such as (though not necessarily limited to) the following comprise reasonable alternatives for the purposes of the SEAD and if so that they are subjected to an SEA process:

- i. Not allocating any additional parking spaces on grounds of sufficient space.
 - ii. Allocating a site for car parking without the additional housing proposed.
 - iii. Providing overflow parking on sites of considerably less than 2.7 hectares so as to minimise the scale of development and intrusion into the green belt. This could include, for example, allocating the 9 spaces which the SLC representation considered necessary on a pro rata basis for Blakedown itself and
 - iv. Appraisal of further provision of parking in other locations, such as for example on brownfield sites in Kidderminster through a multi-storey car park on a brownfield site (for example).
 - v. Options for accommodating demand in Hagley and Hartlebury.
 - vi. Other assumptions as to the levels of parking demand likely to be connected to rail use.
 - vii. Not meeting the alleged need for additional parking connected to rail use.
- d. We hope that the local planning authority will be able to respond positively to this representation so as to allow the Parish to withdraw its objections. Failing the removal of policy 36.6A we will be requesting that the Inspector invite, or alternatively direct the withdrawal of the plan pursuant to [section 21\(9\)\(a\) of the Planning and Compulsory Purchase Act 2004](#), on the grounds that in light of the flaws identified above the plan is not capable of being made sound through modifications or after-the-fact consultation: since it is quite clear on the authorities cited above that the SEA process is not an after-the-fact procedure: designed to inform the plan-making choices before a policy is proposed for inclusion in a plan.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

No I do not wish to speak at the examination.

Yes I would like to speak at the examination.

12. If you wish to speak at the examination, please outline why you consider this to be necessary:

If it will assist The Inspector The Parish Council wishes to reserve the right to speak at the Examination or to allow its planning, highways and legal advisers to do so

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to speak at the examination.

13. Are there any other comments you would like to make?:

Please see attached:

Planning Advice
Prepared by Simon Rees BSc, MA, MRTPI (Director), AddisonRees Planning Consultancy Ltd

Highways Advice
Technical Note - Proposed Land Allocations at Lea Castle & Blakedown
Prepared by John Lloyd BSc MSc (Transport Planning and Engineering) MCIHT

Please also see The Parish Council's Further Comments below

1	<p>The evidence based is flawed</p> <p>The statistics and growth forecasts adopted by SLC Rail have not been verified or tested Blakedown has a limited need for additional parking spaces by 2043.</p> <p>The evidence base in SLC Rail’s Report pre-dates that used in Worcestershire County Council’s LTP4 Report.</p> <p>It is contradictory and embellishes the need for further parking in Blakedown.</p> <p>The additional evidence produced by the Council contradicts that of Worcestershire County Council’s LTP 4 and appears to be based on unsubstantiated evidence.</p> <p>The further 171 spaces have been manufactured to justify the substantial urban extension at Lea Castle, which is clearly going to have significantly adverse impacts upon the surrounding infrastructure</p>
2	<p>The treatment of Kidderminster and Blakedown Stations should not be interchangeable</p> <p>Kidderminster has more frequent and varied services, hence its greater use and popularity.</p> <p>Moving a perceived (and questioned) car parking requirement 3 miles along the road to meet WCC’s plans will not solve the problem</p> <p>The Council has failed to demonstrate the need for the very large number of spaces in this location</p>
3	<p>The identified housing sites in The Plan to the eastern side of Kidderminster are not sustainable in transport terms which has caused the “push” eastwards to Blakedown</p> <p>The proposed extension to the eastern side of Kidderminster and Lea Castle has resulted in significant sustainability concerns in terms of the capacity for Kidderminster to support such growth from a transport point of view.</p> <p>The Council has effectively pushed the additional growth and transport pressures from Kidderminster on to Blakedown.</p> <p>Using a small scale village such as Blakedown to overcome the sustainability issues of Kidderminster fundamentally undermines the sustainability credentials of this Local Plan Review.</p>

4	<p>The Council's approach is contrary to NPPF</p> <p>No exceptional circumstances have been demonstrated to remove this land from the Green Belt</p> <p>A proper assessment of alternative potential sites, including both non-Green Belt and Green Belt locations does not appear to have been carried out, especially in co-operation with neighbouring Authorities.</p> <p>The Council has not demonstrated proper regard to sustainable development objectives, or that the proposed brownfield and green belt sites are the most sustainable options taking account of all relevant factors including travel impacts, loss of amenity, and seriously compromising the basic purposes of including land in Green Belts.</p> <p>In particular Hartlebury Station (Wychavon District Council) is arguably more accessible to residents of the southern and western sides of Kidderminster, Bewdley and Stourport, and which is adjacent to large parcels of brownfield land</p>
5	<p>Over intensification of use of site and loss of amenity to neighbouring residents</p> <p>The lapsed planning consent for Station Yard 08/0430/FULL - Change of use to car park, landscaping and associated works was for only 34 cars, so the current proposal is a significant increase.</p> <p>That permission contained numerous conditions to safeguard the amenity of neighbouring residents including landscaping, lighting, hours of use, and retention of boundary trees – many of which have now been removed</p>
6	<p>Compromised Access</p> <p>In the recently refused application for residential development of Station Yard – ref 14/0661/OUTL, Network Rail as a Statutory Consultee commented “One thing to consider though is that if the access road directly adjacent to the level crossing is being converted into parking as part of the same scheme then the risk of blocking back over the crossing is still possible. With that in mind Network Rail still propose that the original mitigations that were suggested (keep crossing clear signs, yellow box markings) are retained and funded by the developer”</p> <p>There was also concern by the Planning Officer about significant loss of amenity to residents of neighbouring houses on Lynwood Drive and Swan Close.</p> <p>This view was shared by the Planning Inspector at Appeal.</p>
7	<p>No apparent regard to the recent Churchill & Blakedown Neighbourhood Plan (Adopted 26/7/17)</p>

8	<p>No “Exceptional Circumstances” have been evidenced or reasoned to justify the removal of this site from the Green Belt</p> <p>The proposal allocation fails on all 5 purposes of the Green Belt – sprawl, merging, encroachment, character, urban regeneration</p> <p>WFDC’s Green Belt Review, Part II – Site Analysis undertaken by Amec Foster Wheeler in April 2017 noted the site’s characteristics in regard to Green Belt and NPPF Policies as follows:</p> <ul style="list-style-type: none"> · To check the unrestricted sprawl of large built-up areas <p>CONTRIBUTION</p> <p>Development of the site would constitute sprawl, extending the built edge of Blakedown along the A456, although contained nature of the site means that this is only a localised effect. There would be a rounding off of northeastern edge of the village, and in doing so the creation of a new context to village and to some extent the loss of a rural context.</p> <ul style="list-style-type: none"> · To assist in safeguarding the countryside from encroachment <p>CONTRIBUTION</p> <p>The site is strongly enclosed on all sides, but adjoins/is part of open countryside to the north.</p> <ul style="list-style-type: none"> · To preserve the setting and special character of historic towns <p>CONTRIBUTION</p> <p>The site does not contribute to the setting or special character of historic towns or villages, <u>although is a gateway site into Blakedown.</u></p> <ul style="list-style-type: none"> · Overall Assessment of Contribution to Green Belt Purposes <p>CONTRIBUTION</p> <p>The site makes a contribution to Green Belt purposes because of its containment of Blakedown particularly along the A456 Birmingham Road, The high degree of physical and visual containment limits the impact of development on the Green Belt, although this is a gateway site into Blakedown which is locally significant in turn demanding particular attention to edge treatment, built density and massing.</p>
9	<p>Contradicts WFDC’s Green Belt Review (2017)</p> <p>WFDC considered this to be an important gateway site into Blakedown and makes an important contribution because of its containment of the village along the A456.</p> <p>The Council’s Green Belt Review and site analysis was based on a smaller site allocation than now proposed, and no station parking. Their analysis is therefore flawed and does not fully assess the implications of this proposed new allocation.</p>

10	<p>It is unnecessary and is not supported by any robust or reliable evidence</p> <p>WCC's LTP identifies a need for 79 parking spaces.</p> <p>These can be accommodated in WFR/CB/2, notwithstanding concerns over the reliability of evidence used to arrive at the future need for that site</p> <p>There is no need for any further train station car parking within Blakedown that cannot already be met by the car park allocation at Station Yard (WFR/CB/2) under the lapsed planning permission</p> <p>Flawed and unreliable evidence that WFDC appear to be relying upon to remove this allocation from the Green Belt and allocate it for a mixed use development but primarily for an additional 170 car parking spaces and 50 houses they have been unable to accommodate elsewhere in the District that have an identified need for housing that Blakedown does not.</p>
11	<p>This is a Major Development that has not received full and proper Consultation or proper consideration</p> <p>The provision of 50 houses and 170 space car parking area will result in a major development. This allocation proposes major development of a scale, which is completely out of character with the village of Blakedown.</p> <p>The density and massing of this allocation will be significant and will completely erode this important gateway site, encroaching significantly east along the Birmingham Road.</p> <p>The site will be clearly visible from surrounding areas and would not be physically or visually contained.</p> <p>Whilst no details are provided on the final design of the proposed allocation there are likely to be significant infrastructure works required to deliver the scheme.</p> <p>This will result in the site being more visible and prominent within the Green Belt.</p> <p>The surrounding openness would be severely harmed.</p>
12	<p>Encroachment and Cooperation has not been properly considered</p> <p>The proposed allocation encroaches further towards the town of Hagley, which will shortly be subject to significant areas of land being removed from the Green Belt to accommodate the significant growth required to meet the housing needs of Bromsgrove District and Birmingham under its own ongoing Green Belt Review.</p> <p>Concern that WFDC have not undertaken an appropriate Duty to Cooperate with adjoining authorities.</p>

13	<p>The Housing Need in the proposed Plan is not needed in Blakedown</p> <p>The Council are using the SLC Rail report to justify the provision of 50 dwellings in Blakedown. As part of the Neighbourhood Plan adoption, there was evidence of need for only 7 affordable houses and 18 market houses required over the plan period.</p> <p>The provision of 50 dwellings would go well beyond what Policy AM6B is seeking to achieve in village and rural settlements.</p> <p>This is not due to the village being the most appropriate location of new residential development in the District, but solely as a means to deliver the proposed train station parking area, the need for which is questioned.</p> <p>The Wyre Forest District Housing Need Study 2018 has identified that there is only an annual affordable housing need within Churchill and Blakedown of 3 dwellings per annum.</p> <p>The total of number of houses proposed to be allocated to all the rural settlements in the District is 115.</p> <p>This has been increased from the initial pre-submissions process, which originally identified only 65 dwellings.</p> <p>Blakedown would therefore accommodate approximately 58% of all village growth across WFDC's District during the next plan period.</p>
14	<p>Blakedown is not as sustainable as the proposed Plan suggests</p> <p>Blakedown has limited local services and should only be accommodating a level of growth commensurate to that of the other villages in the District.</p> <p>The station, bus route and limited local facilities might benefit the occupiers of any new homes, but the lack of employment/need to travel for services far outweighs these perceived advantages</p> <p>Blakedown lacks any significant employment opportunities</p> <p>For many facilities (including secondary schools, main retail provision and healthcare) residents have to travel to larger centres</p> <p>There are no reasons on housing supply grounds to represent the exceptional circumstances necessary to release the site from the Green Belt.</p>
15	<p>Adverse effects on local ecology</p> <p>Inadequate Ecological and Environmental Assessments have been undertaken before promoting this site</p> <p>The area of wetland to the north of the site is Blakedown Brook which feeds into the SSSI at Hurcott Pool and should be protected</p>
16	<p>Viability has not been demonstrated, save for a "Developer's Option in SLC Rail's Report, which has not been reviewed or analysed, which completely undermines the justification for the 50 houses and the 170 car parking spaces in Blakedown.</p>

17	<p>The proposed 50 houses are unlikely to meet the identified local housing need</p> <p>The Council’s reliance on the SLC Rail Report that a developer led scheme for 50 dwellings in Blakedown will deliver the train station parking area is misjudged.</p> <p>The Council has failed to provide any robust evidence to justify the provision of 50 dwellings in Blakedown and demonstrate how these units will deliver the 170 car parking spaces now required in Blakedown.</p> <p>50 houses are not necessary according to all recent Housing Needs Surveys</p> <p>All recent Housing Needs Surveys have identified a need for small scale local housing – lower cost or affordable small dwellings for First Time Buyers, new families, and downsizing need for elderly residents which frees up the existing stock of larger houses for those established on the housing ladder</p> <p>A residential development of 50 dwellings, which needs to provide 25% affordable housing (in line with Policy 8B) and other tariff style contributions (i.e. highway improvements; open space; education; recycling etc) is very unlikely to be able to financially support the development of the car park.</p> <p>The Council has not considered the viability implications of this allocation in terms of the delivery of the car park.</p> <p>This allocation places a significant financial burden on any future developer wishing to build out the residential allocation.</p> <p>The inability of a scheme to provide any affordable housing or other tariff style contributions will result in increased pressures upon the existing housing needs of local people and the very limited services and facilities already provided in the village, and in neighbouring settlements, in particular healthcare provision.</p>
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Data Protection

The information you provide on the form will be stored on a database used solely in connection with the Local Plan. Representations will be available to view on the council's website, but address, signature and contact details will not be included. However, as copies of representations must be made available for public inspection, they cannot be treated as confidential and will be available for inspection in full. Copies of all representations will also be provided to the Planning Inspectorate as part of the submission of the Wyre Forest District Local Plan. By submitting this form you are agreeing to these conditions.

Please see the Councils Data Protection and Privacy statement:

<http://www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx>

By signing this form you are agreeing to The Council's Data Protection Policy above and the storage of your information.

Signature

Agreece

Date

10th October 2019

Please return the completed form by **no later than 5:00pm on 14 October 2019** to:

Email: LPR@wyreforestdc.gov.uk

Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

Consultation response forms can be completed and submitted online at: www.wyreforestdc.gov.uk/localplanreview

