

# Statement of Common Ground between Wyre Forest District Council and South Worcestershire Councils (Wychavon, Malvern & Worcester)

## 1) Introduction

Under the National Planning Policy Framework (NPPF, 2019), strategic policy making authorities, such as local planning authorities, should produce, maintain and keep up to date a Statement of Common Ground (SofCG) to highlight agreement on cross boundary strategic issues with neighbouring local authorities and other relevant bodies.

This SofCG has been produced to support the emerging Wyre Forest District Local Plan Review. It sets out how Wyre Forest District Council has engaged with the South Worcestershire Councils in order to fulfil its Duty to Cooperate requirements.

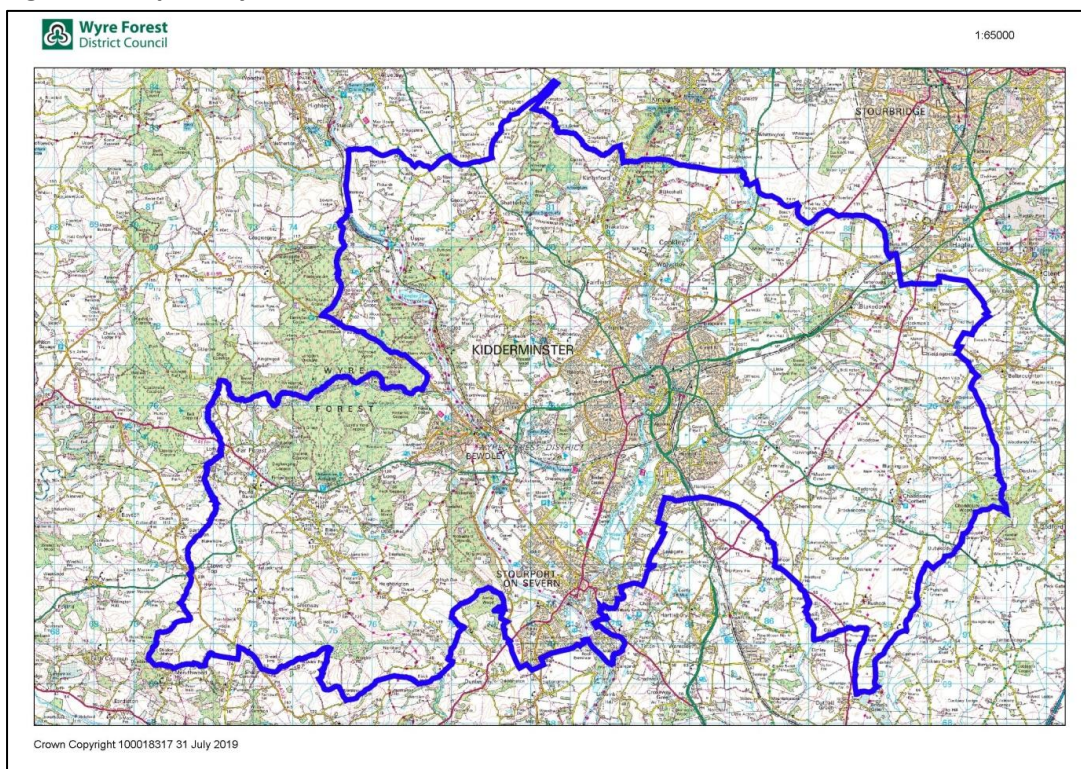
## 2) Parties Involved

This Statement of Common Ground (SofCG) has been prepared jointly by Wyre Forest District Council (WFDC) and the South Worcestershire Councils (SWC). South Worcestershire is the area covered by the administrative areas of Malvern Hills District Council, Wychavon District Council and Worcester City Council.

## 3) Strategic Geography

This SofCG covers all of the Wyre Forest District and has been produced for the purposes of the Wyre Forest District Local Plan 2016-2036, which is due to be submitted to the Planning Inspectorate in Spring 2020. Figure 1 below shows the district boundary of Wyre Forest District.

**Figure 1: Map of Wyre Forest District**



#### **4) Background / Duty to Cooperate**

There has been ongoing engagement between WFDC and SWC throughout the preparation of the WFDC Local Plan Review. WFDC has consulted with SWC at every stage of plan making. The Local Plan Review consultation periods were as follows:-

- Issues and Options Consultation – September / October 2015
- Preferred Options Consultation – June / August 2017
- Pre-Submission Consultation – November / December 2018
- Pre-Submission Consultation (re-opening) – September / October 2019

Duty to Cooperate meetings have also taken place on the following dates:-

- 12<sup>th</sup> December 2018
- 8<sup>th</sup> April 2019
- 25<sup>th</sup> September 2019

Minutes of the meetings can be viewed in Appendix 1.

In addition to the above meetings, there have also been a number of Worcestershire Planning Officer meetings throughout the plan making period, at which lead Planning Policy Officers from each of the Worcestershire Local Authorities attended to discuss Local Plan Reviews and duty to cooperate issues.

#### **5) Strategic Matters Identified**

The South Worcestershire Councils responded to the WFDC Local Plan Pre-Submission consultation that was undertaken in November / December 2018. Table 1 shows a summary of the responses received from SWC (the full response can be viewed in Appendix 4).

**Table 1: South Worcestershire Councils response to WFDC Local Plan Pre-Submission (October 2018)**

	<b>Issues</b>	<b>Suggested Modification to Plan</b>
SWC	Wyre Forest District Council have fulfilled the Duty to Cooperate with the South Worcestershire Councils, engaging with us at every stage of the Plan's preparation. However, it is noted that Wyre Forest District Council intend to submit the plan for examination in July 2018 and therefore, in accordance with the requirements of NPPF 2018, a Statement of Common Ground should have been prepared and signed by relevant Duty to Cooperate partners. The South Worcestershire Councils have not been asked to sign such a statement and there is no evidence that one has been prepared and made available alongside the publication document.	Prepare a Statement of Common Ground, agree it with relevant Duty to Cooperate partners and publish.
SWC	Paragraph 6.5 refers to the housing number being based on 2016 household projections. The most recent Government advice is to ignore those projections and use the 2014 based household projections instead and therefore, the basis of the housing number should be	Base the housing number on the 2014 based household projections.

	reconsidered.	
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## 6) Matters that parties agree on

Table 2 below shows the matters that both parties agree on.

Table 2: Matters that both parties agree on

	Issues	Suggested Modification to Plan	WFDC Response
SWC	Wyre Forest District Council have fulfilled the Duty to Cooperate with the South Worcestershire Councils, engaging with us at every stage of the Plan's preparation. However, it is noted that Wyre Forest District Council intend to submit the plan for examination in July 2018 and therefore, in accordance with the requirements of NPPF 2018, a Statement of Common Ground should have been prepared and signed by relevant Duty to Cooperate partners. The South Worcestershire Councils have not been asked to sign such a statement and there is no evidence that one has been prepared and made available alongside the publication document.	Prepare a Statement of Common Ground, agree it with relevant Duty to Cooperate partners and publish.	Agree that a Statement of Common Ground should be prepared between WFDC and SWC. This SofCG will be published and made available at submission stage of the Local Plan, as discussed at the DtC meeting on 8 <sup>th</sup> April 2019.

## 7) Matters that parties disagree on

Table 3 below shows matters that parties disagree on.

Table 3: Matters that parties disagree on

	Issues	Suggested Modification to Plan	WFDC Response
SWC	Paragraph 6.5 refers to the housing number being based on 2016 household projections. The most recent Government advice is to ignore those projections and use the 2014 based household projections instead and therefore, the basis of the housing number should be reconsidered.	Base the housing number on the 2014 based household projections.	The WFDC Local Plan Pre-Submission (October 2018 version) was consulted on at the same time as the Government's consultation on the standardised methodology. WFDC used the 2016 figures as the Government was still deciding on the standardised methodology at the time. The 2016 household projections

			give WFDC a housing need figure of 276pa, as opposed to the lower figure of 248pa using the 2014 figures. WFDC wishes to be ambitious with its housing requirement figure in order to support economic growth and affordable housing delivery. This was discussed at the DtC meeting on 8 <sup>th</sup> April 2019.
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**8) Other Strategic Matters discussed at Duty to Cooperate meetings**

As WFDC is a green belt local authority, the question of neighbouring local authorities helping to meet the housing need for Wyre Forest in the emerging and future local plans was discussed at the DtC meeting on 8<sup>th</sup> April 2019. South Worcestershire Councils responded by saying they would need clear evidence from WFDC that the housing need could not be accommodated elsewhere in sustainable locations outside of the green belt. South Worcestershire Councils also have green belt present across the northern areas of Wychavon District and Worcester City and are producing technical evidence which will inform the planning merits of any green belt release in the South Worcestershire Development Plan Review (SWDPR). The emerging WFDC Local Plan is intending to accommodate all of its housing need within its own district area; however this will involve some green belt release which will need to be considered at examination stage by the Planning Inspector.

**9) Governance Arrangements**

The governance arrangements are key to the effectiveness and implementation of the Statement of Common Ground. The table below sets out the requirements for the authorities involved.

<b>Local Authority</b>	<b>Method of Approval</b>
Wyre Forest District Council	SofCG to be agreed by Council Members
South Worcestershire Councils	SofCG to be signed off by each of the SWCs at their relevant meetings as follows: <ul style="list-style-type: none"> <li>• Worcester City Council –Place and Economic Development Committee – 27<sup>th</sup> January 2020</li> <li>• Wychavon District Council – Executive Board – 8<sup>th</sup> January 2020</li> <li>• Malvern Hills District Council – Executive Committee – 21<sup>st</sup> January 2020</li> </ul>

## 10) Timetable for agreement

The table below sets out the timetable arrangement for the Statement of Common Ground to be agreed.

<b>Local Authority</b>	<b>Timetable for approval</b>
Wyre Forest District Council	<ul style="list-style-type: none"><li>- Overview &amp; Scrutiny – 6<sup>th</sup> February 2020</li><li>- Cabinet Meeting – 11<sup>th</sup> February 2020</li><li>- Full Council Meeting – 20<sup>th</sup> February 2020</li></ul>
South Worcestershire Councils	SofCG to be signed off by each of the SWCs at their relevant meetings as follows: <ul style="list-style-type: none"><li>- Worcester City Council –Place and Economic Development Committee – 27<sup>th</sup> January 2020</li><li>- Wychavon District Council – Executive Board – 8<sup>th</sup> January 2020</li><li>- Malvern Hills District Council – Executive Committee – 21<sup>st</sup> January 2020</li></ul>

## 11) Conclusions

The parties agree that:

- i) WFDC has fulfilled its Duty to Cooperate with SWC.
- ii) SWC is satisfied that all matters raised in its representations to the WFDC Local Plan Review (2016-2036) have been addressed.
- iii) The parties will continue to work positively together, including with other authorities where relevant on strategic cross boundary issues.

## 12) Signatories

This Statement of Common Ground has been agreed and signed by the following:-

<b><u>South Worcestershire Councils</u></b>	<b><u>Wyre Forest District Council</u></b>
Name: _____	Name: _____
Position: _____	Position: _____
Date agreed: _____	Date agreed: _____
Signature: _____	Signature: _____

## **Appendices**

- Appendix 1 – Duty to Cooperate Meeting Minutes between WFDC and SWC
- Appendix 2 – SWC response to the WFDC Issues and Options consultation (Sept / Oct 2015)
- Appendix 3 – SWC response to the WFDC Preferred Options consultation (June – Aug 2017)
- Appendix 4 – SWC response to the WFDC Pre-Submission Consultation (Nov / Dec 2018)

# Appendix 1

<b>SOUTH WORCESTERSHIRE DEVELOPMENT PLAN REVIEW – ISSUES &amp; OPTIONS</b>		
<b>Duty to Cooperate – Meetings Proforma</b>		
<b>Council/s:</b>	Wyre Forest District Council	
<b>Meeting date:</b>	Wednesday 12 <sup>th</sup> December 2018	
<b>Venue:</b>	WFDC Offices, Kidderminster	
<b>Attendees:</b>	Fred Davies, Gary Williams, Maria Dunn (SWC), Helen Smith (WFDC)	
<b>Agenda Item:</b>	<b>Wyre Forest District Council responses</b>	<b>SWC responses</b>
<b>1. Local Plan Review Timescale</b>	Will be submitting a representation to the SWDPR Issues & Options.	SWC are on track re the SWDPR and the published 2018 Local Development Scheme.
<b>2. Statement of Common Ground (SoCG) and timing</b>	Supportive of the principle of preparing a Statement of Common Ground.	SWC need a draft SoCG (to be signed by the planning portfolio holders and leaders) agreed by 31 May 2019.
<b>3. Approval mechanism</b>	Will need WFDC Council Approval July 2019.	Full SoCG to be appended to the Preferred Options committee reports for SWC approval in Autumn 2019.
<b>4. Identification of Strategic issues;</b>		
<b>i. unmet housing, employment &amp; retail needs</b>	Due to likely traffic implications for Stourport town centre WFC would not support development at Arley Kings nor Astley.	At this stage, against the published housing requirement, the availability of land (Nb not yet subject to planning appraisal) and the technical evidence produced to date it is evident that the SWC will be able to meet its growth requirements within the study area.
<b>ii. Transport – infrastructure and impacts</b>		Infrastructure impacts not known at this stage. We will share the outputs of the transport modelling of the strategic scale development options.
<b>iii. Environment – Green Belt, Flood Risk; Water supply; SPAs, SSSIs etc</b>		SWC have published a stage 1 Green Belt Study which will be a factor in the consideration of development options (within Wychavon District); preparation of a SFRA and Water Cycle Study underway and SWC happy to share the draft documents with WFDC for comment.
<b>5. Any other business</b>	WFLP Review based on a self contained housing market area i.e. Wyre Forest; going forward with the 2016 Household Projections (higher than for 2014); Progressing with T/TS DPD (2016-2036) as sufficient suitable sites identified in	SWC have submitted representations on the WF Core Strategy review Issues & Options consultation.

Appendix 1

	the district; Aiming for July 2019 re launch of the WFLPR; Strategic housing growth focused at the Kidderminster Eastern Gateway (1,400 dwellings, Taylor Wimpy_ and Lea Castle(Homes England Garden Village 1,400 dwellings + GP surgery and primary school).	
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## Duty to Co-operate Meeting - 8<sup>th</sup> April 2019

### Wyre Forest District Council and South Worcestershire LAs

**Present:**

Fred Davies (SWC)	Maria Dunn (SWC)
Helen Smith (WFDC)	
<b>Apologies:</b>	
None	
	Actions
1.	<p><b>Introductions</b></p> <p>The purpose of the meeting was to have a duty to cooperate discussion following the consultation response received by WFDC from SWC for the WFDC Local Plan Pre-Submission consultation.</p>
2.	<p><b>Local Plan Timetables</b></p> <p>HS ran through the LP timetable for WFDC. The pre-submission consultation was held last year in November/December 2018. The team has since been working through the consultation responses received and checking for any soundness issues for the plan. The EiP is expected to commence in late 2019 and adoption in 2020, based on the current LDS timetable which was approved by Cabinet on 12<sup>th</sup> June 2018.</p> <p>South Worcestershire – local elections being held in May 2019. The Issues &amp; Options document was published at end of last year. South Worcestershire is now preparing the Preferred Options and intends to consult on this during winter 2019 as per the published 2018 - 2021 Local Development Scheme. The Pre-Submission document is planned for autumn 2020. South Worcestershire hopes that they will submit the SWDP for examination to Planning Inspectorate in 2021.</p>
3.	<p><b>Consultation Responses to WFDC Pre-Submission Local Plan</b></p> <p>The consultation responses received by WFDC from South Worcestershire LAs to the WFDC Pre-Submission Local Plan were discussed.</p> <p>A discussion was had about the standardised methodology for calculating housing need and the use of either 2014 or 2016 figures. WFDC explained that the 2016 figures had been used as the Government was still deciding on the standardised methodology at the time; in fact the Government's consultation on the standardised methodology coincided with the WFDC Local Plan Pre-Submission consultation. The 2016 figures give WFDC a housing need figure of 276 pa, as opposed to the lower figure of 247 using the 2014 figures. WFDC felt that the higher housing need figure would be considered more favourable by the Planning Inspector.</p> <p>South Worcestershire LAs are not objecting to the WFDC Local Plan but think that Wyre Forest should continue duty to cooperate discussions with South Worcestershire LAs and prepare a Statement of Common Ground.</p>

## Appendix 1

4.	<p><b>Revised NPPF and Statement of Common Ground</b></p> <p>We discussed the need for a Statement of Common Ground before the Wyre Forest Local Plan examination. It was agreed that the SofCG should be prepared ready for Submission Stage of the Wyre Forest Local Plan.</p> <p>As WFDC is a green belt local authority, the question of neighbouring local authorities helping to meet the housing need for Wyre Forest in the emerging and future local plans was discussed. South Worcestershire LAs responded by saying they would need clear evidence from WFDC that the housing need could not be accommodated elsewhere in sustainable locations outside of the green belt. South Worcestershire LAs also have green belt present across the northern areas of Wychavon District and Worcester City and are producing technical evidence which will inform the planning merits of any green belt release in the SWDPR. HS confirmed that the emerging WFDC local plan is intending to accommodate all of its housing need within its own district area; however this will involve some green belt release which will need to be considered at examination stage by the Planning Inspector.</p>	WFDC and South Worcs LAs to prepare SoCG.
5.	<p><b>Ongoing engagement with DTC partners</b></p> <p>It was agreed that the next meeting should be in July 2019, after the local elections in May.</p>	WFDC will arrange a meeting in July 2019 to hold further DTC.
6.	<p><b>AOB</b></p> <p>The South Worcestershire LAs published Part 1 of the Green Belt Study in November 2018 and will share a draft of part 2 with neighbouring LPAs, including WFDC, for comment prior to publication.</p>	

# Appendix 1

## Duty to Co-operate Meeting - 25<sup>th</sup> September 2019

### Wyre Forest District Council and South Worcestershire LAs


#### Present:

Maria Dunn (SWC)		Helen Smith (WFDC)
<b>Apologies:</b>		
Fred Davies (SWC)		
		Actions
1.	<p><b>Introductions</b></p> <p>The purpose of the meeting was to have a duty to co-operate discussion about the consultation currently running on the WFDC Local Plan Pre-Submission documentation and to discuss the draft Statement of Common Ground.</p>	
2.	<p><b>Local Plan Timetables</b></p> <p>HS ran through the LP timetable for WFDC. The re-opening of the pre-submission consultation is currently being held in September/October 2019. The EiP is expected to commence in Spring 2020 following a Full Council meeting in February 2020. Depending on how the examination goes, it is hoped that the Local Plan would be adopted in Autumn 2020 based on the current LDS timetable which was approved by Cabinet in June 2019.</p> <p>South Worcestershire – local elections were held in May 2019. The Issues &amp; Options document was published at end of last year. South Worcestershire is now preparing the Preferred Options and intends to consult on this during November/December 2019 as per the published 2018 - 2021 Local Development Scheme. The Pre-Submission document is planned for autumn 2020. South Worcestershire hopes that they will submit the SWDP for examination to Planning Inspectorate in 2021.</p> <p>The housing numbers for WFDC and SWC were discussed. The housing numbers for SWC have increased since the adoption of the SWDP, increasing from 1,183 to 1,257. This change in housing numbers has occurred as a result of the Government's Standardised Methodology.</p>	
3.	<p><b>Amendments to WFDC Pre-Submission Local Plan (currently being consulted on as part of Reg 19 consultation)</b></p> <p>A discussion was had about the WFDC Local Plan Pre-Submission consultation and the amendments document that is currently being consulted on. SWC will be considering whether they wish to submit a representation to the consultation by the closing date of 14<sup>th</sup> October 2019. SWC did not think they would be raising any objections to the WFDC Local Plan at this stage.</p>	

## Appendix 1

4.	<p><b>Identification of any cross boundary strategic issues</b></p> <p>The issue of growth at Stourport was discussed and whether SWDP review would be considering allocating anything near this area in the revised Local Plan. HS said that the County Council would need to be consulted as there were serious concerns about traffic congestion and poor air quality in Stourport and the restriction of only one bridge crossing on the Areley Kings side of town. The local schools (both primary and secondary) also have capacity issues. SWC and WFDC agreed to continue DtC dialogue on this issue as part of the SWDP review.</p>	
5.	<p><b>Statement of Common Ground</b></p> <p>HS handed out a draft Statement of Common Ground (SofCG) at the meeting. The SofCG was discussed and the need for Members sign off. It was agreed that the SofCG would need to be ready by early December 2019 for the lead in times for Members meetings in January/February 2020 for both SWC and WFDC.</p>	<p>SWC to check draft SofCG and feedback any comments to HS. Sections 9 and 10 to be updated by SWC with dates for Members meetings.</p>
6.	<p><b>Ongoing engagement with DtC partners</b></p> <p>It was agreed that a final draft version of the Statement of Common Ground would be prepared by early December 2019 (at the latest), so that it is ready for Members meetings in January/February 2020 for sign off before the WFDC Local Plan examination commences.</p> <p>It was agreed that a DtC meeting would be arranged in November 2019 to discuss the SWDP review. This meeting could also be used to finalise the Statement of Common Ground for WFDC Local Plan if necessary.</p>	<p>SWC will arrange a meeting in Nov 2019 to hold further DtC.</p>
7.	<p><b>AOB</b></p> <p>No other business.</p>	

## Appendix 2

 <b>WYRE FOREST DISTRICT COUNCIL</b>	<b>Wyre Forest District Council Local Plan Review</b>	<b>FOR OFFICIAL USE ONLY</b>
	<b>Issues and Options Paper September 2015</b>	Response Number: <input type="text"/>
		Date Received: <input type="text"/>
		Date Acknowledged: <input type="text"/>

### DETAILED RESPONSE FORM

This response form accompanies the Wyre Forest District Local Plan Review Issues and Options paper. The Council welcomes your comments on the paper. Please note that any comments made will not be treated as confidential and may be made publicly available.

Please use additional sheets if required, clearly marking the part of the document to which the comments relate e.g. question / option / paragraph / page number.

**Please submit your comments by 16<sup>th</sup> October 2015.** Comments can be submitted in the following ways:

- online via the consultation portal <http://wyreforestdc-consult.limehouse.co.uk/portal/>
- by email to [planning.policy@wyreforestdc.gov.uk](mailto:planning.policy@wyreforestdc.gov.uk)
- via post to Planning Policy, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

1. Personal Details		2. Agent Details (if applicable)	
Title	<input type="text" value="Mr"/>	Title	<input type="text"/>
First Name	<input type="text" value="Paul"/>	First Name	<input type="text"/>
Last Name	<input type="text" value="Bayliss"/>	Last Name	<input type="text"/>
Job Title (where relevant)	<input type="text" value="SWDP Project Manager"/>	Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text" value="The South Worcestershire Councils"/>	Organisation (where relevant)	<input type="text"/>
Address Line 1	<input type="text" value="Civic Centre"/>	Address Line 1	<input type="text"/>
Line 2	<input type="text" value="Queen Elizabeth Drive"/>	Line 2	<input type="text"/>
Line 3	<input type="text" value="Persore"/>	Line 3	<input type="text"/>
Line 4	<input type="text"/>	Line 4	<input type="text"/>
Post Code	<input type="text" value="WR101PT"/>	Post Code	<input type="text"/>
Telephone Number	<input type="text"/>	Telephone Number	<input type="text"/>
E-mail address	<input type="text"/>	E-mail address	<input type="text"/>

Please tick if you are happy to receive future correspondence by email. x

# Appendix 2

3. Please set out your comments below clearly stating which part of the Local Plan Issues and Options paper each comment relates to (e.g. question / option / paragraph / page number).

Please see attached letter.

(Continue on a separate sheet /expand box if necessary)

Signature:

Date: 15.10.15

Our ref: PB/LM-L

15 October 2015

Mrs Rebecca Brown  
Planning Policy Manager  
Wyre Forest District Council  
Finepoint Way  
Kidderminster  
Worcestershire  
DY11 7WF

Dear Rebecca

## **Wyre Forest District Local Plan Review Issues and Options Consultation**

Thank you for consulting the South Worcestershire Councils (SWC), comprising Malvern Hills District Council, Worcester City Council and Wychavon District Council, with regard to the above. I am pleased that you are giving the Duty to Co-operate serious consideration by engaging with public bodies such as ourselves at the outset of the plan making process. Accordingly I have completed the Wyre Forest District Local Plan Review Duty to Co-operate Proforma.

With regard to the document itself the views of the SWC are as follows. First, the Strategic Character Areas Map is both logical and informative. Second, with respect to the seven potential growth options for allocating new development it is difficult to make an informed judgement until the required quantum of growth to 2032 is identified. Re-development of previously developed land in the most sustainable locations, ie Kidderminster and Stourport, would appear to be the most logical development option and most supportive of the National Planning Policy Framework. Options 2 to 6 clearly cannot be given serious consideration until a comprehensive, robust Green Belt Review is carried out. It is noted that for Options 2, 3 and 5 not all the land is in the Green Belt so these could form revised options depending on the outcome of the Green Belt Review. With respect to Option 5 Bewdley is the third largest settlement in the District so it would be somewhat illogical not to allocate some development which in any event could be on non Green Belt land to the west of the River Severn.

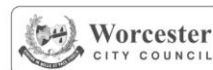
With respect to Option 6 the associated villages all lie within the Green Belt. These villages generally are larger and have more local services than those villages in the District's Rural west

**T: 01386 565000**

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**[www.swdevelopmentplan.org](http://www.swdevelopmentplan.org)**

South Worcestershire Development Plan,  
Civic Centre, Queen Elizabeth Drive, Pershore WR10 1PT



## Appendix 2

(Option 7). They are therefore likely to be the more sustainable option if only limited growth is going to be allocated in the rural area. With respect to Option 7 the safeguarding of existing services and provision of new local services is probably essential if sustainable development is to be achieved in these relatively remote areas. To even retain a local shop or school however would require substantial development. Certainly allocating say 10 to 20 dwellings will have little impact on the retention of local services and may simply exacerbate unsustainable community patterns.

Of course once the required quantum of development and the outcome of the Green Belt Review is known a combination of Options 1 to 7 may be the most appropriate though we expect Options 1 and 4 to feature strongly. Neighbourhood Plans could also be an option for delivering some of the required growth but their proposals would have to be in conformity with strategic policies most importantly that pertaining to the Green Belt.

With respect to the 'Developing Planning Policies' section I make the following observations on the specific questions set out. Developers invariably prefer to build larger dwellings. Only if a technical study clearly identifies a substantive lack of four to five bedroom houses therefore should there be a positive push for them.

The delivery of affordable housing is clearly a vital component of sustainable development and one which may be harder to achieve given so called "starter homes" can now be offset against them. Most developers will be more than happy to do this given the respective financial returns. Taking into account factors such as land reclamation costs and selling prices, a 30% affordable housing target should not compromise development viability on a greenfield site in a rural area but may do so on say a brownfield site in Kidderminster or Stourport.

Like the UK population in general the age profile continues to be skewed towards the elderly so it is entirely appropriate to plan for suitable accommodation which would comprise both C2 and C3 types.

With respect to Gypsy, Travellers and Travelling Showpeople accommodation the needs are set out in the latest GTAA which may need to be refreshed in the light of the recent definition changes set out in Government policy: In terms of supply the larger sites can be more problematic. Associated families tend to prefer living in small groups so further allocations at Sandy Lane may not be the best way of meeting the identified needs.

With respect to employment sites Government policy does not support their long term retention if they are no longer fit for purpose. It is acknowledged that an employment land study, which engages a wide range of local employers and stakeholders, is being undertaken to inform future employment land requirements. Generally speaking any new employment land should be located and is readily accessible to the housing growth areas.



## Appendix 2

It is fairly evident that town centres will need more of a mix of uses, including housing, which keep them viable and vibrant.

With respect to tourism in the absence of any evidence for a site specific proposal there should be a positive generic policy which is supportive of additional investment in tourism be it on an existing site or an entirely new one.

With respect to character and local distinctiveness the plan should include robust policies to protect the best elements and require new investment in GI etc

With respect to transport new growth will inevitably lead to more traffic and in some locations could compromise an air quality management area. The emphasis should be on promoting allocations which score highly in terms of accessibility to local services by foot/cycle/public transport. Alongside that there should be a generic policy setting out infrastructure requirements for new transport infrastructure necessary to make development acceptable in planning terms. Safeguarding transport routes is normally good planning practice though no doubt an inspector will want some evidence that it is necessary and deliverable within the plan period.

With respect to climate change clearly no growth should be advocated outside Flood Zone 1 and there should be a policy on SUDS such that surface water runoff rates are better post development particularly so on brownfield sites.

It is very unfortunate that the latest Government policy is likely to lead to reduced investment in renewable energy and our experience is that inspectors are very reluctant to support any policy which goes beyond the latest building regulations unless there is clear local evidence.

Please do not hesitate to contact me should you require any clarification with the points raised.

Yours sincerely

Paul Bayliss  
Project Manager – SWDP

Copy to: Fred Davies, Policy Manager  
Helen Wilson, Programme Manager

Elaine Wilcox

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**From:** Maria Dunn  
**Sent:** 11 August 2017 16:06  
**To:** LPR Consultation  
**Cc:** Davies, Fred Philippa Smith; Gary Williams  
**Subject:** Preferred Options Consultation Response  
**Attachments:** Wyre Forest Preferred Options Consultation SWC response.doc

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**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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Dear Local Plans Team,

Please find attached the south Worcestershire Councils' response to the above consultation.

Kindest regards,

**Maria Dunn (MRTPI)**  
Planning Policy Team Leader - Worcester City Council

-  **email**
-  **telephone**
-  **mobile**
-  **postal address:** The Guildhall, High Street, Worcester WR1 2EY
-  **follow us:** [www.twitter.com/worcityheritage](http://www.twitter.com/worcityheritage)
-  **website:** [www.worcester.gov.uk](http://www.worcester.gov.uk)



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### Appendix 3

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14<sup>th</sup> August 2017

## Wyre Forest Local Plan Review Preferred Options Consultation

Dear Sir / Madam,

Thank you for the opportunity to comment on the Wyre Forest District Local Plan Review - Preferred Options. It should be noted that the comments below are officer comments which have been endorsed by the Portfolio holders at Wychavon and Malvern Hills District Councils and the Chair and Vice Chair of the Place and Economic Development Committee at Worcester City Council. This response is made in the context of the on-going Duty to Co-operate.

As background, Malvern Hills District Council, together with Worcester City Council and Wychavon District Council adopted the South Worcestershire Development Plan (SWDP) in February 2016.

### Development Strategy

The South Worcestershire Councils (SWCs) are concerned that the issue of the considerable unmet housing need arising within Birmingham is not acknowledged here at all. The Birmingham Development Plan acknowledges a significant shortfall in housing supply. Whilst work is underway to establish how much of this can be accommodated within the Birmingham Housing Market Area, it is understood that some of this growth may need to be exported to adjacent Housing market Areas, particularly those with a clear functional relationship with Birmingham and the Black Country, such as Wyre Forest. The consultation paper sets out a level of growth that the level of housing growth proposed '*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*'. However, it is not clear how the additional growth addresses unmet need arising from outside of Wyre Forest District. It should also be recognised that whilst work is still underway to establish how the Birmingham shortfall will be distributed, there could be a need for the Wyre Forest Local Plan Review to consider higher levels of growth to absorb some of this need. Whilst paragraph 6.8 refers to the Duty to Cooperate, it is not clear what agreement, if any, has been reached with regard to the role of Wyre Forest District in providing homes to meet need arising outside of its own Housing Market Area and any implications that this may have for the Development Strategy

The SWCs support the proposed settlement hierarchy which is logical and informed by appropriate sustainable development planning criteria. With regard to specific options set out at

**T: 01386 565000**

**E: [contact@swdevelopmentplan.org](mailto:contact@swdevelopmentplan.org)**

**[www.swdevelopmentplan.org](http://www.swdevelopmentplan.org)**

South Worcestershire Development Plan,  
Civic Centre, Queen Elizabeth Drive, Pershore WR10 1PT



## Appendix 3

table 6.0.6, the SWCs have some concerns about significant levels of growth at Areley Kings which is currently identified to accommodate approximately 550 new dwellings under option B. This area is adjacent to the Malvern Hills District boundary and has already seen growth come forward within Malvern Hills District. The infrastructure implications of any site allocations within this area need to be carefully considered in the context of recent and planned development on the Malvern Hills side of the administrative boundary to ensure that sufficient capacity exists. In particular, the impact of growth on the current river Severn crossing within Stourport should be considered, particularly as there is no longer an intention to deliver the Stourport Relief Road in Local Transport 4.

Paragraph 13.27 refers to Worcestershire Parkway rail station. Whilst there will be a substantial (500 spaces) amount of parking in this location, the SWCs consider that the focus for the Wyre Forest District Local Plan should be on improving the accessibility of and services to/from local stations within Wyre Forest District (set out at 13.28) rather than the current wording which places an emphasis on park and ride from Worcestershire Parkway which could exacerbate congestion on routes such as the A449.

It is also noted that there is a housing allocation at Clows Top for 30 dwellings. This needs to be considered in the context of the SWDP which allocates land adjacent to Highbrae for 17 dwellings and any proposals coming forward from Shropshire Council in order to ensure that adequate infrastructure is provided and to avoid an over concentration of development within the village.

### Site Allocations

We acknowledge that the Local Plan Review seeks to accommodate all of Wyre Forest District's growth (including housing, Travellers and Travelling Showpeople sites and employment land) needs within its own administrative boundary. However, it is noted that there are a number of housing and employment sites that border Wychavon and Malvern Hills District administrative boundaries.

We note that the Preferred Options includes core sites as well as additional sites grouped within two possible options to meet future growth requirements. The following housing and employment sites are adjacent to Wychavon and Malvern's boundary which could have cross boundary infrastructure delivery implications which will need to be considered as the Plan progresses, the implications will differ depending on which of the two options is taken forward:

#### Wychavon:

- FPH/29 VOSA site, North of Summerfield (employment) 1.72 ha
- FPH/27 East Of Kidderminster: Easter Park, Worcester Road (employment) 9.66 ha
- WFR/ST/2 East Of Kidderminster: Land off Stanklyn Lane, and AS/10 Rear of Spennells and Easter Park – (Option A) up to 930 dwellings
- M1/10 4 Acres Caravan Site (ADR) – The SWCs welcome that the ADR site continues to be safeguarded during the plan period.

## Appendix 3

- M1/3 Parson Chain, Stourport on Severn, (Core Site) 114 dwellings and a link road to relieve congestion at Hartlebury / Worcester Road Island.

### **Malvern:**

- AKR/14 Pearl Lane, Stourport on Severn (Option B) 420 dwellings – In addition to the comments set out earlier within this letter, we acknowledge that a number of issues have been raised about this site including: drainage, encroachment in the countryside, extra traffic which would lead to a new Air Quality Management Area to be implemented.
- AKR/15 Rectory Lane, Stourport on Severn (Option B) 130 dwellings
- BR/RO/1 Former garage, land at Clows Top (Core Housing / Travelling Showpeople site) 30 dwellings.

The SWCs welcome the opportunity for further discussions with Wyre Forest District Council as the Local Plan Review progresses in order to comply with on-going requirements associated with the Duty to Cooperate. Consequently the SWCs wish to continue to be consulted on subsequent stages of the Wyre Forest Local Plan review.

Please do not hesitate to contact me should you require any clarification with regard to this matter.

Yours faithfully

**Fred Davies**

**Planning Policy Manager Malvern Hills and Wychavon and Interim SWDP Project Manager**

**Wyre Forest District Local Plan  
Pre-Submission Publication  
2018**

**OFFICE USE ONLY:**  
Representor number:  
Representation number:  
Plan reference:  
Tests of soundness:

**Consultation Response Form**

**1<sup>st</sup> November – 17<sup>th</sup> December 2018**

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

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.

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

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**Representations must be received by 5:00pm on 17th December 2018.**

**Representations received after this time will not be considered duly made.**

## Appendix 4

### Part A

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

<b>Personal Details</b>		<b>Agent's Details (if applicable)</b>
Title	Miss	Click here to enter text.
First Name	Maria	Click here to enter text.
Last Name	Dunn	Click here to enter text.
Organisation	Worcester City Council on behalf of the South Worcestershire Councils	Click here to enter text.
Job title	Planning Policy Team Leader	Click here to enter text.
Address – line 1	Click here to enter text.	Click here to enter text.
Address – line 2	Click here to enter text.	Click here to enter text.
Address – line 3	Click here to enter text.	Click here to enter text.
Address – line 4	Click here to enter text.	Click here to enter text.
Address – line 5	Click here to enter text.	Click here to enter text.
Postcode	Click here to enter text.	Click here to enter text.
E-mail Address	contact@swdevelopmentplan.org	Click here to enter text.
Telephone Number	01386 565000	Click here to enter text.



## Appendix 4

### Part B - Please use a separate sheet for each representation

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**    **South Worcestershire Councils**

#### 3. To which part of the Local Plan does this representation relate?

Paragraph                      Duty to Cooperate

Policy                              Click here to enter text.

Other:                              Click here to enter text.  
(e.g. Policies map, table,  
figure, key diagram)

#### 4. Do you consider the Local Plan is:

- |  |                              |  |
|--|------------------------------|--|
| 4.1 Legally Compliant                    | Yes <input type="checkbox"/> | No <input type="checkbox"/>            |
| 4.2 Sound                                | Yes <input type="checkbox"/> | No <input type="checkbox"/>            |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

#### 5. If you do not consider the Local Plan is sound, please specify on what grounds

- |                                 |                                     |
|---------------------------------|-------------------------------------|
| Positively Prepared             | <input type="checkbox"/>            |
| Justified                       | <input type="checkbox"/>            |
| Effective                       | <input type="checkbox"/>            |
| Consistent with National Policy | <input checked="" type="checkbox"/> |

*Please tick as appropriate*

**6. 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.

Wyre Forest District Council have fulfilled the Duty to Cooperate with the south Worcestershire councils, engaging with us at every stage of the Plan's preparation. However, it is noted that Wyre Forest District Council intend to submit the plan for examination in July 2018 and therefore, in accordance with the requirements of NPPF 2018, a Statement of Common Ground should have been prepared and signed by relevant Duty to Cooperate partners. The south Worcestershire councils have not been asked to sign such a statement and there is no evidence that one has been prepared and made available alongside the Publication document.

**7. 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 6 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 will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Prepare a Statement of Common Ground, agree it with relevant Duty to Cooperate partners and publish.

## Appendix 4

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### **8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

**No** I do not wish to participate at the oral examination.

**Yes** I would like to participate at the oral examination.

### **9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

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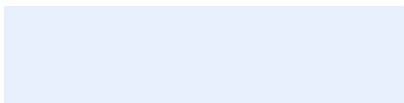
## Appendix 4

Please see the Councils Data Protection and Privacy statement:

[www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx](http://www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx)

If you are submitting this form electronically you will need to agree to our data protection policy.  
Please tick here if you agree.

Signature



Date [Click here to enter a date.](#)

Please return the completed form via email by **no later than 5:00pm on 17 December 2018**

Email: **[LPR@wyreforestdc.gov.uk](mailto:LPR@wyreforestdc.gov.uk)**

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

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# Appendix 4

## Part A

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

<b>Personal Details</b>		<b>Agent's Details (if applicable)</b>
Title	Miss	Click here to enter text.
First Name	Maria	Click here to enter text.
Last Name	Dunn	Click here to enter text.
Organisation	Worcester City Council on behalf of the South Worcestershire Councils	Click here to enter text.
Job title	Plannig Policy Team Leader	Click here to enter text.
Address – line 1	Click here to enter text.	Click here to enter text.
Address – line 2	Click here to enter text.	Click here to enter text.
Address – line 3	Click here to enter text.	Click here to enter text.
Address – line 4	Click here to enter text.	Click here to enter text.
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Telephone Number	01386 565000	Click here to enter text.

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**Name or Organisation**    **South Worcestershire Councils**

### 3. To which part of the Local Plan does this representation relate?

Paragraph                      6.5

Policy                              [Click here to enter text.](#)

Other:                              [Click here to enter text.](#)  
(e.g. Policies map, table,  
figure, key diagram)

### 4. Do you consider the Local Plan is:

4.1 Legally Compliant	Yes <input type="checkbox"/>	No <input type="checkbox"/>
4.2 Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.3 Complies with the Duty to co-operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

### 5. If you do not consider the Local Plan is sound, please specify on what grounds

Positively Prepared	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Consistent with National Policy	<input checked="" type="checkbox"/>

*Please tick as appropriate*

## Appendix 4

**6. 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.

Paragraph 6.5 refers to the housing number being based on 2016 household projections. The most recent Government advice is to ignore those projections and use the 2014 based household projections instead and therefore, the basis of the housing number should be reconsidered.

**7. 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 6 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 will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Base the housing number on the 2014 based household projections..

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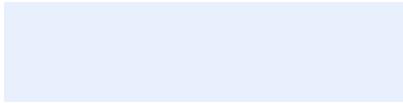
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Signature



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