

**NOTICE OF DELEGATION OF DECISION TO CABINET MEMBER BY STRONG LEADER**

Section 15(4) of the Local Government Act 2000, the senior executive member may discharge any of the functions that are the responsibility of the Cabinet or may arrange for them to be discharged by another member of the Cabinet or Officer. On 1<sup>st</sup> December 2010, the Council adopted the Strong Leader Model for Corporate Governance 2011 as required under Part 3 of The Local Government and Public Involvement in Health Act 2007 (The 2007 Act).

I, Graham Ballinger, as Strong Leader, delegate the decision to approve the Wyre Forest District response to the Pre-Submission Draft of the Shropshire Local Plan Consultation (Reg 19) to the Cabinet Member detailed below:

Cabinet Member- Councillor Helen Dyke

Dated: 25<sup>th</sup> January 2021



Signed: .....

Leader of the Council

**FORM 2**

**NOTICE OF DECISION OF CABINET MEMBER**

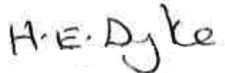
Pursuant Section 15(4) of the Local Government Act 2000, as amended by section 63 of the Local Government and Public Involvement in Health Act 2007, the senior executive member may discharge any of the functions that are the responsibility of the Cabinet or may arrange for them to be discharged by another member of the Cabinet or Officer. On 1<sup>st</sup> December 2010, the Council adopted the Strong Leader Model for Corporate Governance 2011 as required under Part 3 of The Local Government and Public Involvement in Health Act 2007 (The 2007 Act).

In accordance with the authority delegated to *me / by the Leader* (delete as appropriate), I have made the following decision:

<b>Subject</b>	<b>Decision</b>	<b>Reason for decision</b>	<b>Date for Decision to be taken</b>
Shropshire Local Plan Review – Pre-Submission Consultation (Reg 19).	The consultation comments in Appendix 1 are approved.	As a neighbouring local authority, Wyre Forest District Council has been invited to comment on the Shropshire Local Plan Review Pre-Submission Consultation (Reg 19). Appendix 1 sets out the council's response of which future housing and employment allocations are of the most importance.	

**I confirm that the appropriate statutory officer consultation has taken place with regard to this decision.**

Dated: 25<sup>th</sup> January 2021

Signed: ..... 

Councillor Helen Dyke  
Cabinet Member for Economic Regeneration, Planning and Capital Investments

## **WYRE FOREST DISTRICT COUNCIL**

### **Strong Leader Report**

#### **Shropshire Local Plan Review – Pre-Submission Consultation**

<b>OPEN</b>	
<b>DIRECTOR:</b>	Corporate Director: Economic Prosperity & Place
<b>CONTACT OFFICER:</b>	Helen Checketts
<b>APPENDICES:</b>	Wyre Forest District Council response to the Pre-Submission Draft of the Shropshire Local Plan Consultation (Reg 19).

### **1. PURPOSE OF REPORT**

- 1.1 To agree the consultation comments to be submitted to Shropshire Council Local Authority in response to their Local Plan Review Pre-Submission Consultation.

### **2. RECOMMENDATION**

- 2.1 The Cabinet Member is asked to DECIDE that:

The consultation comments in Appendix 1 to the Pre-Submission Draft of the Shropshire Local Plan Consultation (Regulation 19) are approved for submission to Shropshire Council.

### **3. BACKGROUND**

- 3.1 Shropshire Council is continuing to progress its Local Plan Review and is currently consulting on the Pre-Submission draft of the Shropshire Local Plan. In September 2020 Wyre Forest District Council submitted comments to the Shropshire Local Plan Pre-Submission consultation (Reg 18) which ran from 3rd August to 30th September 2020. Following changes to a small number of sites the Shropshire Pre-Submission consultation (Reg 19) runs from 18<sup>th</sup> December 2020 to 5<sup>th</sup> February 2021.
- 3.2 As a neighbouring Local Authority Wyre Forest District Council has been invited to respond to the Pre-Submission consultation. This is to comply with Duty to

Co-operate. The comments submitted by Wyre Forest District Council in response to the previous Pre-Submission consultation in September 2020 are still relevant as the changes made between the two Pre-Submission documents do not affect the validity of the previous comments which are attached at Appendix 1.

#### 4. **KEY ISSUES**

4.1 The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan identifies a draft vision and draft framework for the future development of Shropshire to 2038, to address issues such as the needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seeks to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design. It contains:

- Draft strategic policies which set the priorities and framework for the Local Plan;
  - Draft 'strategic' implementation policies and more 'detailed' draft policies for managing development;
  - Draft settlement policies which provide draft strategies and draft guidelines for the settlements of Shropshire, including where appropriate identifying draft proposed site allocations;
- And
- Draft strategic settlement and draft strategic site policies which identify these draft proposed sites and provide draft strategies and draft guidelines for their development.

4.2 Wyre Forest District has significant linkages with Shropshire in terms of employment, transport and economic development.

4.3 The proposed responses to the consultation are set out in the response in Appendix 1.

4.4 The key issues include:

- Housing allocations within the Shropshire Pre-Submission Local Plan and potential increased demand on infrastructure within Wyre Forest District.

- Employment allocations within the Shropshire Pre-Submission Local Plan and potential increased demand on infrastructure within Wyre Forest District.

## **5. FINANCIAL IMPLICATIONS**

- 5.1 There are no financial implications directly arising from this response.

## **6. LEGAL AND POLICY IMPLICATIONS**

- 6.1 Duty to Co-operate and Statement of Common Ground.

The National Planning Policy Framework (NPPF) 2019 paragraphs 24-27 states that local planning authorities are under a Duty to Co-operate with each other. This is in order to demonstrate effective and on-going joint working and that local plans produced are positively prepared and justified. Discussion between the authorities should help determine if and where additional infrastructure is required. It states that strategic policy making authorities should prepare at least one Statement of Common Ground. This document includes cross-boundary matters and cooperation between parties to address issues.

- 6.2 Wyre Forest District and Shropshire signed a Statement of Common Ground for the Wyre Forest District Submission Plan. Under current legislation a Statement of Common Ground should be signed between the two parties in relation to the Shropshire Plan before it is submitted to the Planning Inspectorate. This should make reference to comments that have been submitted by Wyre Forest District Council to the Pre-Submission consultation.

## **7. EQUALITY IMPACT NEEDS ASSESSMENT**

- 7.1 Not applicable.

## **8. RISK MANAGEMENT**

- 8.1 If the Council fails to respond to this consultation it runs the risk of not engaging in the process to shape the future Shropshire Council Local Plan and its impact upon the Wyre Forest district.

## **9. CONCLUSION**

- 9.1 As a neighbouring local authority, Wyre Forest District Council has been invited to comment on the Shropshire Local Plan Review Pre-Submission Consultation. Appendix 1 sets out the council's response of which future housing and employment allocations are of the most importance and the impact due to traffic movements on Bewdley and Stourport-on-Severn.

## **10. CONSULTEES**

- 10.1 The comments at Appendix 1 which were previously submitted in response to the previous Pre-Submission consultation were considered by Corporate Leadership Team and Overview and Scrutiny Committee on 8<sup>th</sup> September 2020. The comments contained in Appendix 1 were amended to reflect the comments from Overview and Scrutiny Committee. This was reflected in the Strong Leader report in September 2020 and the submission to Shropshire Council.

## **11. BACKGROUND PAPERS**

- 11.1 Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038 (Regulation 19)  
[Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038](#)
- 11.2 Strong Leader report and Appendix 1 dated 14<sup>th</sup> September 2020 in response to Shropshire Local Plan Pre-Submission consultation.  
[http://www.wyreforest.gov.uk/council/docs/doc56051\\_20200914\\_cabinet\\_decision\\_report.pdf](http://www.wyreforest.gov.uk/council/docs/doc56051_20200914_cabinet_decision_report.pdf)

## 12. **APPENDICES**

12.1 Appendix 1- Wyre Forest District Council consultation response to the Shropshire Local Plan Review - Pre-Submission Draft (Reg 19) of the Shropshire Local Plan consultation.

## Appendix 1

### Wyre Forest District Council Response to the Shropshire Council Local Plan Review Pre-Submission Consultation

- 1 Thank you for the opportunity to comment on the Shropshire Council Local Plan Review Pre-Submission Consultation document. We are not objecting to the Shropshire Council Local Plan Review Pre-Submission plan but would make the following comments:
- 2 The Regulation 19: Pre-Submission consultation version of the Shropshire Local Plan pulls together the previous consultation stages of the plan preparation.
- 3 The Pre-Submission document proposes a total of 30,800 dwellings which includes 1,500 from the Black Country to support the housing needs of the emerging Black Country Plan where evidence indicates that housing delivery opportunities are constrained. This number is higher than the 28,750 dwellings in the Preferred Options consultation which was equivalent to 1,430 per year due to be built between the 2016-2036 plan period. The plan period has been extended by 2 years to 2038 which is equivalent to 1,400 dwellings to be built per year. The Local Plan proposes strategic sites at Clive Barracks Tern Hill, the former Ironbridge Power Station sites and RAF Cosford.
- 4 Significant principal centres located near to Wyre Forest District which have been allocated development are:

Bridgnorth with around 1,800 proposed dwellings, previously the number was 1,500. This includes Tasley Garden Village a mixed-use sustainable urban extension to the south-west of Bridgnorth outside designated Green Belt. It would consist of 1,050 dwellings, 16ha of employment land, a new local centre, 20ha of green infrastructure together with a 19ha linear park. There are existing commitments for Bridgnorth due to total completions, sites with planning permission or prior approval, a saved allocation or windfall. Therefore in the Pre-Submission Plan the allocation is for 1,050.

Ludlow with around 1,000 dwellings and 11ha of employment land, also Burford 190 dwellings and Clee Hill 75 dwellings. Of these the actual Local Plan allocations are Ludlow 10, Burford 175 and Clee Hill 20. This is due to sites that already have planning permission, prior approval, saved allocations in the current Local Plan or windfall sites.

Proposed developments close to Wyre Forest District are in the settlements of Cleobury Mortimer (200 dwellings), Alveley (130), Ditton Priors (65) and Highley (250 dwellings and 3ha of employment land), in total 645 dwellings. Some of these sites have planning permission or prior approval, are saved allocations or windfall sites. The proposed allocation of 250 within Highley in particular could adversely affect congestion in Bewdley town centre, because access from Highley would be via Dowles Road which leads to the heavily used junction with Welch Gate (an air quality management area).
- 5 A total of 300 hectares of employment land is proposed during the plan period which equates to 15ha of employment land per annum. As the strategic centre Shrewsbury is allocated the largest quantity at 91 ha, with 49ha allocated for Bridgnorth (this has increased from 28ha in the previous consultation) and 11ha for Ludlow.
- 6 A summary of locations close to Wyre Forest District which have been allocated housing and employment development is shown below-



Location	Type of Settlement	Settlement Population <sup>1</sup>	Dwelling Estimate	Housing Allocation	Employment Allocation
Bridgnorth	Principal Centres and key centres	13,028	6,189	1,800	49
Alveley	Community Hub	1,583	718	130	
Ditton Priors*	Community Hub	831	342	65	
Ludlow	Principal Centres and key centres	10,717	5,404	1,000	11
Burford	Community Hub	1,202	517	190	
Clee Hill	Community Hub	916*	403	75	
Craven Arms	Principal Centres and key centres	2,607	1,210	500	5
Highley#	Principal Centres and key centres (with Netherton)	3,195	1,462	250	3
Cleobury Mortimer	Principal Centres and key centres	3,049	1,306	200	2

\*Clee Hill and The Knowle

# Highley with Netherton

- 7 By allocating the majority of development within the strategic and principal centres, the preferred sites document appears to be consistent with sustainable development as outlined in the revised NPPF.
- 8 However, Wyre Forest District Council has serious concerns that the future development will result in adverse pressure on existing infrastructure that is important to Wyre Forest District, such as traffic levels on the A442 from Bridgnorth to Kidderminster and additional pressure on the Dowles Road/Welch Gate Air Quality Management Area junction in Bewdley and Stourport-on-Severn. Transport modelling work must identify highway improvements that may be necessary as a result of future development.
- 9 It is noted that Cleobury Mortimer is currently developing its Neighbourhood Plan, in which employment and residential land is to be allocated. This will have to support the delivery of strategic policies contained in the Local Plan Review, as outlined in the revised NPPF.
- 10 Wyre Forest District Council welcomes further employment land allocated in the local plan review. Employment land should be located within sustainable locations, with access to the strategic road

<sup>1</sup> Shropshire Council, *Hierarchy of Settlements*, 2018, p33-43 and updated from information contained in Shropshire Council Local Plan Review Pre-Submission August 2020.

networks and where possible to encourage vibrant town centres with a day/night economy. Wyre Forest has already a strong employment relationship with Shropshire, with 638 out commuting and 1,037 inflowing to Wyre Forest per day<sup>2</sup>. Coupled with greater land allocation for employment this may contribute to further employment out-migration from Wyre Forest.

- 11 Property in Wyre Forest District is significantly lower in price than that of properties in Shropshire, this may result in further work out migration from Wyre Forest District. As of November 2018 Shropshire average house price is £215,345, compared to Wyre Forest's £193,585. The West Midlands region average house price is £197,387<sup>3</sup>.
- 12 Wyre Forest would strongly support the protection of Shropshire Green Belt, as part of the wider West Midlands Green Belt, of which 11% is located within Shropshire. Protecting Green Belt land in order to prevent urban sprawl by keeping land permanently open is stated within the revised National Planning Policy Framework<sup>4</sup>. Wyre Forest would furthermore oppose any development within parcels BA5 and BA6 which are adjacent to the district<sup>5</sup>, as the village of Highley is allocated for 250 dwellings and is located just outside parcel BA6.
- 13 Wyre Forest District Council welcomes the opportunity for further discussion with the Shropshire Council through the Duty to Co-operate process and welcome the confirmation that transport modeling is to be undertaken as requested by Wyre Forest District Council. This is the final stage of consultation before the Shropshire Local Plan is submitted to the Planning Inspectorate.

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<sup>2</sup> *Wyre Forest Employment Land Review Update: Final Report, October 2018, Paragraph 3.51.*

<sup>3</sup> <http://landregistry.data.gov.uk/app/ukhpi/browse?from=2017-11-01&location=http%3A%2F%2Flandregistry.data.gov.uk%2Fid%2Fregion%2Fwyre-forest&to=2018-11-01>

<sup>4</sup> *National Planning Policy Framework, February 2019, Paragraphs 133-147*

<sup>5</sup> *Shropshire Green Belt Assessment Final Report, September 2017, p 58 & 60*

