

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 ¹	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

¹ 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 day². 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 £197,387³.
- 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 Framework⁴. Wyre Forest would furthermore oppose any development within parcels BA5 and BA6 which are adjacent to the district⁵, 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.

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

³ <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>

⁴ *National Planning Policy Framework, February 2019, Paragraphs 133-147*

⁵ *Shropshire Green Belt Assessment Final Report, September 2017, p 58 & 60*