

Statement of Common Ground between Shropshire Council and Wyre Forest District Council

December 2021

1. Introduction

- 1.1. The National Planning Policy Framework (2019) (NPPF), specifies that Local Planning Authorities are “*under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries*”¹.
- 1.2. The NPPF also specifies that “*in order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance and be made publicly available throughout the plan-making process to provide transparency*”².

2. Purpose

- 2.1. This Statement of Common Ground (SoCG) has been produced to support the Shropshire Council Local Plan Review. It sets out how Shropshire Council and Wyre Forest District Council have engaged in order to fulfil their Duty to Cooperate requirements.

3. Scope

- 3.1. The National Planning Practice Guidance (NPPG) provides details on the scope of a SoCG, which can be summarised as follows:

¹ MHCLG, (2019), NPPF – Paragraph 24

² MHCLG, (2019), NPPF – Paragraph 26

- The plan-making authorities responsible for joint working detailed in the statement;
- A description and map of the administrative areas covered by the statement, and a brief justification for these area(s);
- The key strategic matters being addressed by the statement;
- Governance arrangements for the cooperation process;
- If applicable, the housing requirements (if known) within the area covered by the statement;
- Distribution of needs or the process for agreeing distribution of needs (including whether there is and the distribution of unmet needs);
- A record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
- Any additional strategic matters to be addressed by the statement which have not already been addressed.

3.2. The NPPG also recognises that *“The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities’ websites”*³.

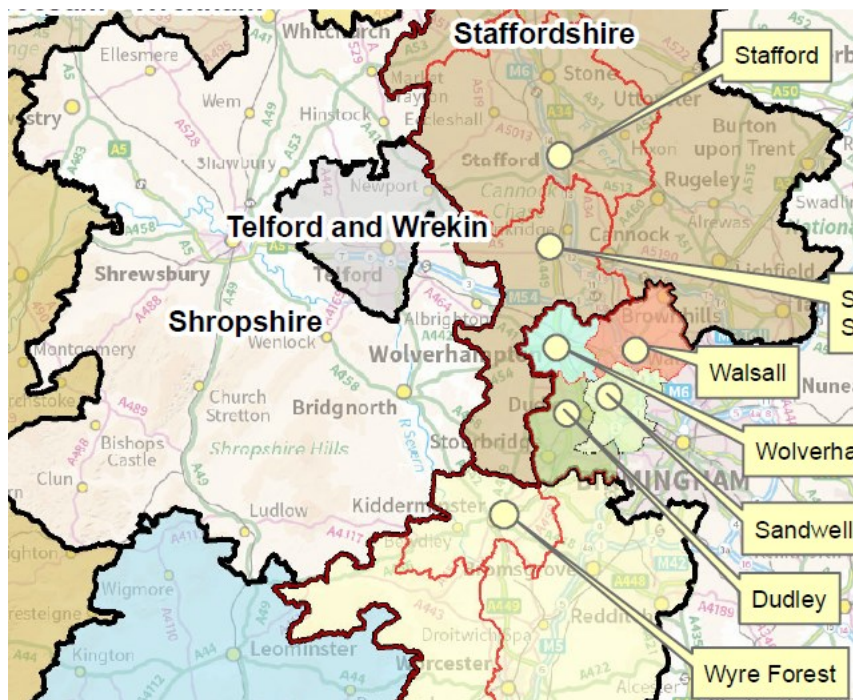
³ MHCLG, (2019), NPPG – Plan Making, Paragraph: 011 Reference ID: 61-011-20190315

4. Relevant Local Authorities and Geography

4.1. This SoCG has been prepared jointly by Shropshire Council and Wyre Forest District Council. The two Local Planning Authorities are neighbouring authorities and between them cover the entirety of the administrative areas of Shropshire and Wyre Forest respectively.

4.2. Figure 1 illustrates the location of Shropshire and Wyre Forest Council areas:

Figure 1: Map of Shropshire Council and Wyre Forest District Council



4.3. As neighbouring Local Planning Authorities, it is important that effective duty to cooperate discussions are undertaken regarding strategic matters that cross administrative boundaries.

4.4. Given the different timescales for the preparation of documents associated with the Local Authorities' Local Plan Reviews, this SoCG focusses solely on the Shropshire Local Plan Review (2016-2038). Duty to Cooperate discussions between the authorities have already taken place which have informed the submission of the Draft Wyre Forest Local Plan currently subject to its Examination in Public (EiP) process.

5. Duty to Cooperate

Shropshire Council Local Plan Review

- 5.1. The Shropshire Local Plan currently comprises the Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015), together with the adopted Neighbourhood Plans. On completion of the review process, the Core Strategy and SAMDev documents will be replaced by a single Local Plan document (supported by any adopted Neighbourhood Plans) which will include all strategic and detailed policies, together with all site allocations for a Plan period 2016 to 2038.
- 5.2. Shropshire Council is at an advanced stage in the review of its Local Plan which has been through several stages of consultation as set out below. Further to the completion on the Regulation 19 stage of plan preparation in February 2021, the Council now intend to submit the Local Plan for Examination in August 2021.
- 5.3. There has been ongoing and active engagement between Shropshire Council and Wyre Forest District Council throughout the Shropshire Council Local Plan Review, with a separate Statement of Common Ground being agreed to inform the submission of the Wyre Forest District Draft Local Plan in 2019. Shropshire Council has consulted Wyre Forest District Council at every stage of plan making.
- 5.4. The Shropshire Local Plan Review consultation periods thus far are as follows:
 - Issues and Strategic Options Consultation – 23rd January 2017 to 20th March 2017.
 - Preferred Scale and Distribution of Development Consultation – 27th October 2017 to 22nd December 2017.
 - Preferred Sites Consultation – 29th November 2018 to 8th February 2019.
 - Strategic Sites Consultation – 1st July 2019 to 9th September 2019.
 - Regulation 18: Pre-Submission Draft of the Shropshire Local Plan – 3rd August 2020 – 30th September 2020.
 - Wyre Forest District Council have been consulted as part of the ‘Regulation 19’ Consultation undertaken 18th December 2020 and 26th February 2021 to inform the Shropshire Local Plan Review.
 - Duty to Cooperate discussions will continue at appropriate times as the Local Plan Review progresses.

Wyre Forest Local Plan Review

- 5.5 The Wyre Forest Draft Local Plan was submitted for Examination on 30th April 2020. More information on this can be found here

<https://www.wyreforestdc.gov.uk/planning-and-buildings/planning-policy/local-plan-examination/>. A separate Statement of Common Ground addressing cross boundary issues between the Councils was agreed to inform the submission of the Wyre Forest Local Plan Review.

6. Key Strategic Matters

- 6.1. Using Government's standard methodology, in 2020, Shropshire Council calculated a Local Housing Need (LHN) which applies to both the Local Planning Authority area and the Shropshire Council housing market area of some 1,177 dwellings per annum (equating to 25,894 dwellings over the 22-year plan period from 2016-2038). The assessment of need will be kept under review. Shropshire Council is proposing to meet the entirety of its LHN.
- 6.2. The Shropshire Council area is considered to represent a self-contained housing market area (HMA).
- 6.3. Shropshire's proposed development strategy seeks to support a sustainable pattern of future growth across Shropshire over the Plan period. Key aspects of its strategy for growth are:- high housing growth of 30,800 dwellings (Between 2016-2038) with a balanced employment requirement of 300 ha; an urban focused distribution of development with the majority of development and infrastructure growth directed to Shrewsbury and the other Shropshire towns together with strategic sites, and more limited development to support the sustainability of rural communities. Shropshire Council has consulted on development options which would meet its own housing and employment needs within its own administrative area.

Green Belt

- 6.4 In order to achieve a sustainable pattern of development, Shropshire Council is proposing to accommodate development in such a way that helps make more sustainable, balanced, vibrant, resilient and self-reliant places in which to live and work. Specifically, the Local Plan Review directs the majority of new development towards the larger settlements with the most extensive range of services, facilities and infrastructure to support it. However, it also allows for appropriate levels of development within rural areas, to support the longer-term sustainability of rural communities.
- 6.5 The eastern part of Shropshire is within the West Midlands Green Belt. To inform the ongoing Local Plan Review, Shropshire Council has undertaken a Green Belt review. Whilst most additional development is proposed in locations outside the Green Belt, the strategic economic importance of the eastern part of the County, particularly the M54 corridor, is a significant consideration. Impacts on longer term sustainability of Green Belt settlements due to constraints on their ability to meet

their local development requirements have also been identified. As such, a level of Green Belt release is proposed within the ongoing Local Plan Review.

- 6.6 As required by NPPF, Shropshire Council have explored with Wyre Forest District Council their ability to accommodate Green Belt development requirements, particularly those relating to the sustainable growth requirements of specific settlements. This has been formalised in a written communication sent 27th February 2020. Wyre Forest District Council have indicated through the Duty to Cooperate discussions that they are not in a position to accept any of Shropshire's housing need from the eastern side of Shropshire and are therefore not able to meet these identified Green Belt development requirements.

6 Other Strategic Matters

- 6.1 Wyre Forest District Council submitted representations to the Regulation 19 Stage of Shropshire Council's Local Plan process. Full comments can be viewed here <http://shropshire.gov.uk/media/19402/a0101-wyre-forest-district-council.pdf>
- 6.2 The following provides a summary of these comments.

Significant principal centres located near to Wyre Forest District which have been allocated development are Bridgnorth with a proposed residential development guideline of some 1,800 dwellings and 49ha of employment land and Ludlow with a proposed residential development guideline of some 1,000 dwellings and 11ha of employment land. Proposed developments close to Wyre Forest District include that within the settlements of Cleobury Mortimer (200 dwellings and 2ha of employment land), Alveley (130 dwellings), Ditton Priors (65 dwellings), Highley (250 dwellings and 3ha employment land), Burford (190 dwellings), Clee Hill (75 dwellings) and Craven Arms (500 dwellings and 5ha employment land). 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. However, we have serious concerns that future development will result in adverse pressure on existing infrastructure 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. In particular, the proposed allocation of 250 dwellings within Highley 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). The Cleobury Mortimer Neighbourhood Plan will have to support the delivery of strategic policies contained in the Local Plan Review, as outlined in the revised NPPF. Welcome further employment land allocations in the Local Plan Review. Employment proposals combined with the existing strong links between Wyre Forest and Shropshire (638 out commuting and 1,037 inflowing to Wyre Forest per day) may increase these in and out migration trends (particularly as property prices in Wyre Forest are significantly lower than Shropshire). Strongly support protection of Shropshire Green Belt as part of the wider West Midlands Green Belt. Particularly opposed to any development within parcels BA5 and BA6.

- 6.3 Whilst these comments have not raised specific soundness or legal compliance issues with the Draft Local Plan, Shropshire Council have provided the following response to the comments raised by Wyre Forest District Council at the Regulation 19 stage...

Draft Policy DP25 states that new development should only take place where there is sufficient existing infrastructure capacity available or any necessary improvements are funded through developer contributions or other means. This of course applies to all development proposals and forms of infrastructure, including highways. The draft site guidelines for proposed allocation BRD030 in Bridgnorth specifically reference the need to make any necessary improvements to the wider highway network informed by Strategic and Local Transport Assessments. Whilst the draft site guidelines for proposed allocations P58a and STC002 specifically reference the need to undertake necessary improvements to highways infrastructure. The draft site guidelines for proposed allocations LUD056 and LUD052 in Ludlow specifically reference undertaking highway improvements informed by appropriate Transport Assessments. No new allocations are proposed in Craven Arms. A Neighbourhood Plan is being progressed for the Cleobury Mortimer Parish area. The Neighbourhood Plan will include the strategy for achieving the housing and employment guidelines for the Key Centre of Cleobury Mortimer. However as specified above, draft Policy DP25 would of course apply to any development proposed in this settlement. As specified above, draft Policy DP25 would apply to any development, including of the proposed allocations, in Alveley, Buford, Ditton Priors and Clee Hill. Draft Policy DP25 would also apply to all development in Highley. For the sake of clarity a minor modification is proposed to the draft site guidelines for proposed allocation HNN016 to confirm that of course all necessary highway improvements will be undertaken, informed by an appropriate Transport Assessment, in accordance with draft Policy DP25.

With regard to Bridgnorth specifically, it should also be acknowledged that further independent highway assessment work has been carried out by Shropshire Council to support the allocation of Tasley Garden Village. This can be found here...

<http://shropshire.gov.uk/committee-services/documents/s27819/Appendix%20a%20Bridgnorth%20Development%20Options%20Assessment%202021%20-%20Highway%20Report.pdf>

Gypsies and Travellers

Shropshire Council

- 7.1 Shropshire has finalised an updated Gypsy and Traveller accommodation assessment (GTAA 2019). The updated GTAA refines the previously published GTAA (2017) by updating site information and considering public site management data to better understand and evidence site capacity and pitch turnover. Unauthorised encampment activity is also considered.
- 7.2 The evidence from the GTAA (2019) concludes that there is no current strategic requirement for allocation. However, the need to provide a permanent plot for Travelling Showpeople resident on a temporary site in Shropshire and potentially for public transit capacity to support private provision are identified. These requirements are being addressed by the Council, with planning permission granted for a travelling showpersons site and a public consultation on a location for a temporary Council transit site undertaken in late 2020. In addition to the intended direct provision, local plan policy will facilitate the ongoing delivery of sites to meet arising needs. Shropshire thus intends to address its own needs for gypsy and traveller provision.

Minerals & Waste

Shropshire Council have engaged with Worcestershire County Council on the Duty to Cooperate process regarding Minerals and waste issues.

8 Matters of Agreement

- 9.1 Shropshire Council intends to meet their identified Local Housing Need (LHN) within their Local Authority area.
- 9.2 There are no significant unresolved strategic cross boundary issues which require resolving.

9 Matters of Disagreement

10.1 There are no matters about which Shropshire Council and Wyre Forest District Council disagree.

11 Governance Arrangements

11.1 Governance arrangements are key to ensure that effective duty to cooperate discussions are undertaken and an appropriate SoCG prepared.

11.2 Updating of this SoCG will be linked to key milestones within the Local Plan processes for the Local Planning Authorities involved.

12 Conclusions

12.1 The parties agree that:

- i) Shropshire Council has fulfilled its Duty to Cooperate with Wyre Forest District Council.
- ii) The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

13 Signatories

13.1 This SoCG has been agreed and signed by the following:

Figure 2: Signatories

Shropshire Council	Wyre Forest District Council
Name: Edward West Position: Planning Policy and Strategy Manager Date agreed: 15/12/2021 Signature:	Name: Mike Parker Position: Corporate Director: Economic Prosperity & Place Date agreed: 15/12/2021 Signature:

