

Open

Special Overview & Scrutiny Committee

Agenda

6pm
Thursday, 25th October 2018
Council Chamber
Wyre Forest House
Finepoint Way
Kidderminster



Overview & Scrutiny Committee

Members of Committee:

Chairman: Councillor H E Dyke
Vice-Chairman: Councillor M Rayner

Councillor N Harris
Councillor N Knowles
Councillor S Miah
Councillor H S Williams

Councillor K Henderson
Councillor D Little
Councillor S J Walker
Councillor S J Williams

Would Members please note that, to ensure continuity in scrutiny, substitutes should only be appointed for the Scrutiny Committee in exceptional circumstances.

Information for Members of the Public:

Part I of the Agenda includes items for discussion in public. You have the right to inspect copies of Minutes and reports on this Agenda as well as the background documents used in the preparation of these reports.

Part II of the Agenda (if applicable) deals with items of "Exempt Information" for which it is anticipated that the public may be excluded from the meeting and neither reports nor background papers are open to public inspection.

Declaration of Interests by Members – interests of members in contracts and other matters

Declarations of Interest are a standard item on every Council and Committee agenda and each Member must provide a full record of their interests in the Public Register.

In addition, alongside the Register of Interest, the Members Code of Conduct ("the Code") requires the Declaration of Interests at meetings. Members have to decide first whether or not they have a disclosable interest in the matter under discussion.

Please see the Members' Code of Conduct as set out in Section 14 of the Council's constitution for full details.

Disclosable Pecuniary Interest (DPI) / Other Disclosable Interest (ODI)

DPI's and ODI's are interests defined in the Code of Conduct that has been adopted by the District.

If you have a DPI (as defined in the Code) in a matter being considered at a meeting of the Council (as defined in the Code), the Council's Standing Orders require you to leave the room where the meeting is held, for the duration of any discussion or voting on that matter.

If you have an ODI (as defined in the Code) you will need to consider whether you need to leave the room during the consideration of the matter.

Co-opted Members

Scrutiny Committees may wish to appoint Co-Opted Members to sit on their committee in order to add value to the scrutiny process. To appoint a Co-Opted Member, a Committee must first agree to appoint either a specific person or to approach a relevant organisation to request that they put forward a suitable representative (e.g. the local Police Authority). Co-Optees are non voting by default but Committees can decide to appoint voting rights to a Co-Optee. The Co-Option of the Member will last no longer than the remainder of the municipal year.

Scrutiny Committees can at any meeting agree to terminate the Co-Option of a Co-Opted Member with immediate effect. Where an organisation is appointed to put forward a Co-Opted Member, they are able to send a substitute in exceptional circumstances, provided that they notify Democratic Services in advance. Co-Opted Members must sign up to the Members Code of Conduct before attending their first meeting, failure to sign will mean that they are unable to participate. This also applies to substitute Co-Opted Members, who will need to allow sufficient time before a meeting in order to sign the Code of Conduct.

The following will apply:

- i) The total number of voting co-opted members on any Scrutiny Committee will not exceed 25% at any one time.
- ii) The total number of voting Co-opted Members on any Review Panel will not be limited.
- iii) Those Co-opted Members with voting rights will exercise their rights in accordance with the principles of decision making set out in the constitution.

For Further information:

If you have any queries about this Agenda or require any details of background papers, further documents or information, you should contact Louisa Bright, Principal Committee and Member Services Officer, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF. Telephone: 01562 732763 or email louisa.bright@wyreforestdc.gov.uk

Wyre Forest District Council

Overview & Scrutiny Committee

Thursday, 25th October 2018

Council Chamber, Wyre Forest House, Finepoint Way, Kidderminster

Part 1

Open to the press and public

Agenda item	Subject	Page Number
1.	Apologies for Absence	
2.	Appointment of Substitute Members To receive the name of any Councillor who is to act as a substitute, together with the name of the Councillor for whom he/she is acting.	
3.	Declarations of Interests by Members In accordance with the Code of Conduct, to invite Members to declare the existence and nature of any Disclosable Pecuniary Interests (DPI's) and / or Other Disclosable Interests (ODI's) in the following agenda items and indicate the action that they will be taking when the item is considered. Please see the Members' Code of Conduct as set out in Section 14 of the Council's Constitution for full details.	
4.	Wyre Forest District Local Plan: Pre-Submission Publication To consider a report from the Spatial Planning Manager which sets out the next stage of the Local Plan Review, referred to as the Regulation 19 Pre-Submission Publication consultation. This is the final stage of consultation before submission of the Local Plan to Government.	5



Overview & Scrutiny Committee

Briefing Paper

Report of: Helen Smith
Date: 25th October 2018
Open

Wyre Forest District Local Plan: Pre-Submission Publication

1. Summary

- 1.1 The purpose of this report is to:
- 1.2 Set out the next stage of the Local Plan Review, referred to as the Regulation 19 Pre-Submission Publication consultation. This is the final stage of consultation before submission of the Local Plan to Government. The Regulation 19 Local Plan is brought to the Overview and Scrutiny Committee today for consideration. The Pre-Submission Publication document is shown in Appendix 1.
- 1.3 To report the consultation responses received for the Local Plan Review Preferred Options consultation undertaken in summer 2017. The Consultation Responses are shown in Appendix 2.
- 1.4 To present to Members the draft Consultation Plan for the Pre-Submission Publication consultation to be held from 1st November 2018 until 5pm on 17th December 2018.

2. Background

- 2.1 The review of the Local Plan began in late 2015 with the Issues and Options consultation. Since the close of that consultation, officers worked with the Local Plans Review Panel (LPRP) to bring forward the next stage of the review which was the Preferred Options consultation (Regulation 18).
- 2.2 The Preferred Options consultation (Reg 18) outlined a combination of Core sites and options A and B which gave two potential options for growth and commenced on 15th June 2017 and ended on 14th August 2017. It was carried out in compliance with the Council's adopted Statement of Community Involvement (2013). The consultation included contacting individuals and organisations on the Local Plan database, public drop-in sessions, and information provided via the Council's website and social media. At the end of the consultation process the Council had received over 5,000 responses from members of the public, developers, organisations and statutory consultees.

- 2.3 A summary of the key issues from the Preferred Options consultation was made available to LPRP at the LPRP meeting on 15th January 2018. Feedback from the consultation on the preferred options sites was also provided to LPRP at the meetings held on 19th February 2018 and 19th March 2018.
- 2.4 Since the Preferred Options consultation closed, work has commenced on the Pre-Submission Publication version of the Local Plan. Further technical evidence base work has been undertaken in relation to the proposed site allocations and the findings of this with officer recommendations were presented to LPRP on 24th September 2018 and 15th October 2018. LPRP has thus reviewed the proposed site allocations and have made their recommendations to officers.
- 2.5 On 15th October 2018 LPRP considered the proposed Local Plan Pre-Submission Publication document (Appendix 1) in its entirety. This enabled the LPRP to consider the draft policies, including the development strategy proposed for the district.
- 2.6 On 24th September 2018 and 15th October 2018 LPRP also considered the Consultation Responses to the Preferred Options consultation and gave feedback to officers regarding the officer comments to the consultation responses. The Consultation Responses can be found digitally in Appendix 2. It will be presented to Cabinet on 30th October for final approval.
- 2.7 As a result of the representations to the Preferred Options consultation, the Council has progressed updates to various pieces of evidence in order to address the technical issues that have arisen from the Regulation 18 consultation. Updates to the evidence base have been undertaken for the following technical studies:
- Objectively Assessed Housing Needs (now the Housing Needs Study)
 - Employment Land Review
 - Heritage Evidence Base
 - Traffic Modelling
 - Ecological Appraisals
 - Strategic Flood Risk Assessment update
 - Water Cycle Study update
 - Infrastructure Delivery Plan update
 - Viability Assessment update
 - Green Belt Study update
 - Open Space, Built Facilities and Playing Pitch Strategies
- 2.8 The findings of these updated technical studies have helped to inform the Pre-Submission Publication (Reg 19) version of the Local Plan.
- 2.9 The Objectively Assessed Housing Needs study undertaken in April 2017 proposed a housing needs figure of 300 dwellings per annum and this was consulted on during the Preferred Options stage. Subsequent to this the

Ministry of Housing, Communities and Local Government (MHCLG) in September 2017 (as part of the original consultation) published a minimum dwelling need for Wyre Forest of 246 each year using the standardised methodology for assessing housing needs. This figure was based on 2014 Household Projections and has since been updated in September 2018 to the 2016 Household Projections data and the Affordability ratio's giving a new, standardised methodology figure of 276.

- 2.10 At Preferred Options consultation, the Council proposed an allocation of 6304 dwellings (option A) or 6559 dwellings (option B) over an 18 year period. The table in paragraph 2.11 below shows what proportion of these dwellings would have been on brownfield, greenfield (non-GreenBelt) and Green Belt greenfield sites. The Green Belt land take would have been 2.4% under option A and 1.9% under option B. The allocations under both these options were between 17% (option A) and 21% (option B) over the actual dwelling requirement at the time.
- 2.11 The Council is now proposing an allocation of approximately 6360 dwellings over a 20 year period (2016-36). The clear and firm legal advice is that the Council allocates around 15% more than required, to allow for sites not coming forward. The table below also shows what proportion of dwellings in the Local Plan Pre-Submission would be on brownfield, greenfield (non-Green Belt) and Green Belt greenfield sites. Completions and any planning approvals have been included in these figures, including recent approvals on greenfield sites. This will require 2.1% of the Green Belt to be released for development. All Green Belt greenfield sites will have to provide a minimum of 40% green space as part of any development.

	Brownfield	Greenfield (non-Green Belt)	Green Belt (greenfield)	Green Belt land take
Preferred Options - Option A	47%	5%	48%	2.4%
Preferred Options - Option B	45%	14%	41%	1.9%
Pre- Submission	49%	7%	44%	2.1%

- 2.12 The Local Plan Pre-Submission has a plan period of 2016 to 2036; this is an extension of the plan period by 2 years to that which was consulted on at Preferred Option stage. This change will make the plan period 20 years and is necessary to make the plan compliant with the NPPF (para 22) which states: *“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.”* Extending the plan period to 2036 will enable the plan to have a 15 year time period from the date of adoption, which is anticipated to be in 2020 following the examination.

- 2.13 As explained in paragraph 2.2 above, the Preferred Options consultation outlined a combination of Core sites and options A and B which gave two potential options for growth. In the Pre-Submission Publication document, the Council is proposing to allocate a combination of these sites to provide both deliverable and sustainable growth for the district.

3. Purpose of the Local Plan Pre-Submission Publication Consultation

- 3.1 The Pre-Submission Publication Consultation represents the third stage in the review of the District's Local Plan. The first stage was the Issues and Options Consultation in late 2015. This was followed by the second stage in Summer 2017 for the Preferred Options consultation.
- 3.2 The aim of the Pre-Submission consultation is to seek views on whether the emerging Local Plan is legally compliant and if it is considered to be 'sound'. It is different from previous consultations, as all responses received by the Council will be submitted to the Government appointed Planning Inspector.

4. Pre-Submission Publication Consultation Document

- 4.1 The Pre-Submission Publication document takes account of:
- The extensive evidence base that has been built up since 2015;
 - The Issues and Options consultation reported in November 2015 to Cabinet;
 - The Preferred Options consultation reported to Overview and Scrutiny as part of this report in October 2018;
 - Duty to Cooperate conversations with neighbouring local authorities, the County Council, relevant Statutory Organisations and key infrastructure providers;
 - Advice received from the Local Plans Review Panel.
- 4.2 Given the changes to the National Planning Policy context, attention is particularly drawn to the following two key issues:
- Housing need and land supply; and
 - Employment land supply.
- 4.3 Housing need and land supply
- 4.4 The Wyre Forest Housing Need Study (HNS) 2018 provides the latest available evidence to help to shape the future planning and housing policies of the area. This study updates the 2017 Objectively Assessed Housing Needs (OAHN) study that was published alongside the Preferred Options document. The HNS (2018) has been produced by consultants Arc4/Edge Analytics using the Government's new standardised methodology and supersedes all previous OAHN studies published by the Council. The terminology associated with housing policy has changed and the Planning Practice Guidance now refers to 'housing need' rather than 'objectively assessed housing need'. This updated study has helped to inform the

production of the Local Plan Pre-Submission Publication document and its associated evidence base studies. The HNS study has considered the need for affordable housing and the size, type and tenure of housing need for different groups within the community. The research provides an up-to-date analysis of the social, economic, housing and demographic situation across the district.

- 4.5 The 2018 NPPF (Paragraph 60) states *“to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*
- 4.6 The HNS (2018) report has considered the future housing need for Wyre Forest District based on the standard methodology developed by the Ministry of Housing, Communities and Local Government (MHCLG). Based on the standard methodology and 2017 affordability ratios, the minimum local housing need for Wyre Forest has increased to 276 dwellings per year under the 2016-based MHCLG household projections.
- 4.7 The Pre-Submission Publication seeks to allocate a sufficient number of sites to accommodate this housing need identified in the HNS (2018) report.
- 4.8 Employment Land Supply
- 4.9 The consultants Nathaniel Lichfield & Partners were appointed in June 2018 to undertake an update to the Employment Land Review (ELR) that Lichfields produced on the Council’s behalf in April 2016. It was considered necessary to revisit the 2016 ELR to ensure it aligns with:
- The Housing Needs Study (2018) undertaken by arc4/Edge Analytics;
 - Updated Experian data projections;
 - Revised National Planning Policy Framework;
 - Additional B-class employment sites to be assessed; and
 - Extended Local Plan period (i.e. 2016 to 2036).
- 4.10 The NPPF (2018) paragraph 80 states: *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”*

4.11 The ELR (2018) report appraised a range of employment land projections for Wyre Forest District using a variety of methodologies in accordance with the former Planning Practice guidance (as this being the most up-to-date PPG at the time). A range of factors were considered within the report to help inform the judgement on the appropriate level of employment need for the district. The key issues identified in the ELR report are set out below:

- The Experian baseline scenario projects that there will be a modest loss in B-Class jobs between 2016 and 2036. In comparison, the demand-led Policy On scenario would generate more substantial increases in B-Class jobs due to economic restructuring and increased local demand for premises.
- There has been a small net annual gain of employment land each year between 2005/06 and 2017/18. If this trend continues then it would result in a negligible increase in the supply of employment land.
- There is a net flow of 37,685 residents who commute out from Wyre Forest to work in other areas. Wyre Forest has a lower job density ratio of 0.64 compared to the West Midlands average of 0.79 and neighbouring authorities (0.89 in Wychavon). Rebalancing the land uses of the District to ensure that more (and better quality) jobs are provided could help to reverse this trend and 'claw-back' out-commuters, reducing net out-commuting rates. This is already a strategic target specified in the emerging Local Plan.
- Both of the labour supply scenarios indicate that the labour force (the number of economically active people of working age) is forecast to increase to 2036.

4.12 Consequently, on the basis of these considerations for Wyre Forest District, the ELR (2018) study concludes that the employment land requirement for Wyre Forest District should be 29ha of land between 2016 and 2036.

4.13 The Pre-Submission Publication seeks to allocate sufficient employment land to accommodate this employment need of 29ha.

4.14 Sustainability Appraisal

4.15 When producing Local Plans, local authorities are required to consider, at each stage of production, the impacts their proposals are likely to have on sustainable development. The emerging Local Plan is subject to ongoing Sustainability Appraisal incorporating the requirements of Strategic Environmental Assessment (SA/SEA) as required through NPPF. SA/SEA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan are identified, described and appraised to identify how they support the Council's sustainable development objectives.

4.16 At the Pre-Submission Publication stage of the Local Plan a SA/SEA has been undertaken. The Sustainability Appraisal (2018) is a detailed technical document and is an important background paper to the emerging Local Plan. It has been used to inform the Local Plan and will be made available as a part of the Local Plan Pre-Submission Publication (Reg 19) consultation.

5. Consultation Arrangements

- 5.1 Cabinet will meet on 30th October 2018 to formally agree the Pre-Submission version of the Local Plan for consultation and to the initiation of the Local Plan Pre-Submission Publication consultation which is planned for November to December 2018, taking account of the recommendations made at tonight's meeting of this Committee. The consultation will run from Thursday 1st November 2018 until 5pm on Monday 17th December 2018.
- 5.2 A draft Consultation Plan is attached at Appendix 3. It includes specific details on the proposed dates, timescale and consultation methods that Officers intend to use. The Pre-Submission Publication Consultation will open formally on 1st November 2018 for a 7 week period rather than the normal 6 week period; this is in order to allow the public the maximum opportunity to respond to the consultation. The consultation will finish before the Christmas holidays start.
- 5.3 Consultees will be able to respond to the Pre-Submission document either online, via email or via post, with encouragement to use digital means for ease of administrative handling. Consultation response forms must be used and no late responses will be accepted.
- 5.4 There will be eight drop-in sessions during the consultation period as listed below for the public to address their questions to staff.

Date	Time	Venue
Friday 16 th November 2018	3pm – 7pm	Cookley Village Hall
Saturday 17 th November 2018	10am – 2pm	Offmore Evangelical Church Hall, Kidderminster
Tuesday 20 th November 2018	5:30pm – 8pm	Heronwood Primary School, Spennells, Kidderminster
Friday 23 rd November 2018	3pm – 7pm	Areley Kings Village Hall, Stourport
Saturday 24 th November 2018	10am – 2pm	Stourport Civic Hall
Tuesday 27 th November 2018	3pm – 7pm	St Georges Hall, Bewdley
Thursday 29 th November 2018	3pm – 7pm	Kidderminster Town Hall
Friday 30 th November 2018	3pm – 7pm	St Oswalds Church Centre, Broadwaters Drive, Kidderminster

6. Options

6.1 That Overview and Scrutiny Committee note the progress in the preparation of:

- a) The Pre-Submission Publication Consultation (Regulation 19) documentation; and
- b) The Preferred Options Consultation Responses.
- c) The draft Consultation Plan for the Pre-Submission Publication consultation.

Add either

6.2 Overview and Scrutiny Committee commend the Pre-Submission Publication consultation document, the Preferred Options Consultation Responses, and the draft Consultation Plan to Cabinet for their approval:

Or

6.3 Overview and Scrutiny Committee commend the Pre-Submission Publication consultation document, the Preferred Options Consultation Responses, and the draft Consultation Plan to Cabinet subject to any appropriate recommendations for amendment that Overview and Scrutiny Committee might wish to propose:

Or

6.4 To make any other recommendation to Cabinet that the Committee wish to be considered.

7. Consultation

7.1 The proposed public consultation would start on Thursday 1st November 2018 and finish at 5pm on Monday 17th December 2018. No late responses will be accepted.

8. Related Decisions

8.1 None.

9. Relevant Council Policies/Strategies

9.1 Wyre Forest District Local Plan Review Preferred Options Document (2017).

9.2 Wyre Forest District Local Plan Review Issues and Options Document (2015).

10. Implications

10.1 Financial Implications

The cost of preparing the Local Plan Review has been met by the Planning Policy budget. The District Council will be required to meet the costs of the examination of the Local Plan and this will be met from the existing Planning Policy budgets.

10.2 Legal and policy implications

10.3 The procedures which the Council is required to follow when producing a Local Plan derive from the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Development) (England) Regulations 2012.

10.4 The legislation states that a local planning authority must only submit a plan for examination which it considers to be sound. This is defined by the National Planning Policy Framework (NPPF, 2018) as being:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

10.5 In order for the draft Local Plan to pass the tests of soundness, it is necessary for it to be based on an adequate, up to date and relevant evidence base. The Council also has a legal duty to comply with the Statement of Community Involvement in preparing the Plan and also has a legal 'Duty to Co-operate'.

10.6 Should the Local Plan be successful at examination stage, the District Council will be required to formally adopt the plan and it will become part of the Development Plan for the purposes of determining planning applications.

11. Risk Management

11.1 The main risks in failing to progress a Local Plan for the Wyre Forest District in compliance with laws, regulations and guidance are as follows:

- The plan is found 'unsound' at examination leading to 'withdrawal' of further work;
- Direct interventions by Government into the District Council's Local Plan making;
- Inability to steer, promote or restrict development across its administrative area;
- Potential damage to the Council's image and reputation if a development plan is not adopted in an appropriate timeframe.

12. Equality Impact Needs Assessment

- 12.1 No negative impacts have been identified. The number of the policies included within the Pre-Submission Plan help to promote equality and eliminate discrimination.

13. Wards affected

- 13.1 All wards within the district are affected.

14. Appendices

- 14.1 Appendix 1 – Local Plan Pre-Submission Publication consultation document.
- 14.2 Appendix 2 – Consultation Responses for the Preferred Options consultation.
<http://www.wyreforest.gov.uk/council/meetings/com193.htm#mt8094>
- 14.3 Appendix 3 – Draft Consultation Plan.

15. Background Papers

- 15.1 Local Plan Review Preferred Options document:
<http://www.wyreforestdc.gov.uk/media/3024240/Preferred-Options-Document-June-2017.pdf>
- 15.2 Local Plan Review Issues and Options document:
<http://www.wyreforestdc.gov.uk/media/1462993/I-O-Consultation-Version-September-2015-WEB.pdf>

Officer Contact Details:

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Title: Spatial Planning Manager

Contact Number: 01562 732195

Wyre Forest District Local Plan Pre-Submission Publication

Consultation Plan

1.0 Background

- 1.1 It is a cornerstone of the planning system that communities and stakeholders should be able to influence the matters addressed in planning policy. The National Planning Policy Framework (NPPF) published in July 2018 reinforces the importance of community involvement in paragraph 15: *“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”* In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Wyre Forest District Local Plan Pre-Submission Publication document has been published to allow representations to be made before it is submitted to the Secretary of State. Consultation on the Local Plan Pre-Submission Publication document (known as the Publication document) will run from 1st November to 17th December 2018. All representations received will be submitted with the draft Local Plan to the Secretary of State for examination in public.
- 1.2 At this publication stage, the full Sustainability Appraisal report is also available for consultation. This report includes a non-technical summary setting out the key stages in the Sustainability Appraisal process and the main findings.

2.0 What is the Local Plan Review?

- 2.1 The Pre-Submission Publication document is the latest stage in the preparation of the Wyre Forest Local Plan Review which sets out the long-term vision and strategic context for managing and accommodating growth within the district until 2036. The aim of the Local Plan is to set out:
- The areas where development will take place;
 - The areas that will be protected; and
 - Policies that will be used to determine planning applications.
- 2.2 Under the planning system most development needs planning permission. The principal basis for making those decisions is the development plan; the Local Plan once adopted will form the main part of it for Wyre Forest District, replacing the currently adopted Local Plan.

3.0 Adopted Statement of Community Involvement Requirements

- 3.1 The District Council first adopted its Statement of Community Involvement (SCI) in 2006. Following changes in legislation the SCI was updated, revised and adopted in February 2013. The SCI sets out the Council’s policy for involving the community in the planning process. It also details how the Council intends to involve all sections of the community and provides guidelines and minimum standards to involve the community, interest groups and stakeholders in the production of Local Development Documents. The statement provides guidance on:

- How people will have the chance to make representations on the draft Local Plan, and the process for considering and responding to their views.
- The Examination in Public.
- How the District Council will keep the community informed on progress and outcomes.

3.2 The Statement of Community Involvement (2013) can be viewed on the Council's website here:

<http://www.wyreforestdc.gov.uk/planning-and-buildings/planning-policy/statement-of-community-involvement.aspx>

4.0 The Duty to Cooperate

4.1 The duty to cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

4.2 In order to fulfil the requirements of the Duty to Cooperate, all neighbouring authorities and consultation bodies covered by the Duty to Cooperate will receive a consultation form to complete which will allow any concerns to be raised. This will provide an audit trail to demonstrate that the Duty has been fully considered and complied with. Where cross-boundary issues are identified, officers will offer to meet with each of the neighbouring authorities or organisations concerned to discuss the issues and how the Plan can best address them. In line with NPPF requirements, Statements of Common Ground will be prepared where necessary.

5.0 Targeting Consultation and Methods

5.1 The District Council will actively seek to engage all community groups within the Wyre Forest District. Local planning authorities are required to consult specific bodies which they consider may have an interest in the proposed Local Plan document and other consultation bodies which it considers are appropriate. A list of the specific consultees for Wyre Forest District is set out in Appendix A to this document.

5.2 It is proposed to consult in a variety of ways. Examples include drop-in sessions in Kidderminster, Stourport-on-Severn, Bewdley and in other areas, mini poster displays in a wide range of accessible locations throughout Wyre Forest District, a press release to be circulated to the local newspapers and radio stations as well as a leaflet distribution to householders within the District. All Town and Parish Councils will be sent a consultation notice and be asked to display it on their notice boards.

6.0 Involving Harder-to-reach Groups

6.1 Within the District there are groups which are hard to reach through consultations. The District Council recognises that these groups in particular may have different levels of access to information and therefore may find it harder to get involved in the decision making process. In particular, the District Council will employ the following methods for engaging hard to reach groups: leaflet distribution to households within Wyre Forest District, drop-in sessions at public locations (detailed at 6.2).

7.0 Drop-in Sessions

7.1 During the seven week public consultation on the Local Plan Pre-Submission Publication a number of drop-in sessions will be held. These will be staffed at highly accessible public locations in the three main towns of Kidderminster, Stourport-on-Severn and Bewdley and in other areas. Display boards will be erected at the drop-in sessions and copies of the Pre-Submission Publication document will be made available for public viewing along with other materials, such as evidence base documents. Staff will also be on hand to answer any queries raised by the public.

7.2 Drop-in Sessions

Date	Time	Venue
Friday 16 th November 2018	3pm – 7pm	Cookley Village Hall
Saturday 17 th November 2018	10am – 2pm	Offmore Evangelical Church Hall, Kidderminster
Tuesday 20 th November 2018	5:30pm – 8pm	Heronswood Primary School, Spennells, Kidderminster
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Friday 30 th November 2018	3pm – 7pm	St Oswalds Church Centre, Broadwaters Drive, Kidderminster

7.3 *Poster Displays*

Posters will be displayed at the following locations throughout the duration of the Local Plan Pre-Submission Publication consultation:

- Kidderminster Library
- Stourport Library
- Bewdley Library

KIDDERMINSTER

- Wyre Forest Town Hall
- Wyre Forest Leisure Centre
- Tesco Superstores
- Sainsburys
- Morrisons
- Asda
- Iceland
- Hodge Hill Garden Nurseries
- Barnetts Hill Garden Centre

STOURPORT

- Stourport Civic Hall
- Tesco
- Co-op
- Lidl
- Cooks Garden Centre

BEWDLEY

- Bewdley Museum
- Bewdley Leisure Centre
- Co-op
- Tesco

RURAL AREAS

- Wyre Forest Discovery Centre
- Cookley – Tesco and/or Post Office
- Blakedown Post Office
- Chaddesley Corbett Post Office
- Wolverley Stores
- Fairfield Shop
- Upper Arley Post Office
- Rowberry Farm Shop
- Far Forest Post Office/stores
- Colliers Farm Shop and/or Clows Top Post Office

8.0 Awareness raising – Media

- 8.1 To coincide with the launch of the consultation on the Local Plan Pre-Submission Publication press releases will be organised for the local newspapers, such as the Kidderminster Shuttle. An eye-catching publicity leaflet will be delivered to households throughout the district. The leaflet will detail the dates and times of the exhibitions and details of places where the Pre-Submission Local Publication document can be viewed/downloaded.

9.0 Publishing on the Web

- 9.1 An interactive version of the Pre-Submission Publication document will be made available to enable electronic representations to be made. The interactive consultation response form can be filled in via the On-line portal or downloaded and emailed to LPR@wyreforestdc.gov.uk. The Council strongly encourages responses to be submitted using the on-line response form via the Council's interactive consultation system. (See section 9 below for full details on how to comment).
- 9.2 The evidence base documents will also be made available on the Council's website and copies will also be made available at the consultation drop-in sessions (see 6.2 for venues).
- 9.3 The District Council will also use social media (Twitter and Facebook) to promote the consultation period and the drop-in sessions.

10.0 How to Comment on the Local Plan Pre-Submission Publication document

- 10.1 The seven week consultation of the Pre-Submission Publication will start on Thursday 1st November 2018 and will close promptly at 5pm Monday 17th December 2018. **No late responses will be accepted.**
- 10.2 The consultation response form follows the same structure as the standard response form issued by the Planning Inspectorate. This is so consultation responses are set out in the way the Planning Inspector will consider comments at the public examination. The consultation response form will be made available on the Council's website: www.wyreforestdc.gov.uk/localplanreview. **We will only accept responses submitted using the consultation response form.**
- 10.3 The Council strongly encourages responses to be submitted using the on-line response form via the District Council's interactive consultation system. Consultation responses will only be accepted if submitted in one of the following ways:
- Via the On-line portal
www.wyreforestdc.gov.uk/localplanreview
 - By downloading the form from our website: www.wyreforestdc.gov.uk/localplanreview
 - By collecting a hard copy from main reception at Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF or from the Customer Service Centre (The Hub), Town Hall, Vicar Street, Kidderminster, DY10 1DB.
 - Forms should be emailed to: LPR@wyreforestdc.gov.uk or posted back to Planning Policy Team, Wyre Forest DC, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF.

Please note that representations made at this stage in the process cannot remain anonymous, but details will only be used in relation to the Wyre Forest District Local Plan Review. Your response will be made available to view as part of the Examination process.

- 10.4 The purpose of the consultation is to allow interested parties to make representation on the soundness and legal compliance of the plan. The District Council's statement of representation procedure sets out the procedure for making representations to the plan.
- 10.5 The National Planning Policy Framework (NPPF) (para 35) states that to be sound a local plan must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

11.0 Formally Processing Comments – Procedures

- 11.1 All consultation response forms submitted to the District Council online, by email or post will be acknowledged within five working days of their receipt. After the Pre-Submission Publication consultation period ends, the Planning Policy Team will consider all of the consultation response forms received during the consultation period and may, as a result, update the Submission version of the Local Plan. A consultation summary report will also be produced detailing the key issues raised from the consultation response forms received. This will be presented to and considered by the Overview and Scrutiny Committee and Cabinet. The consultation summary report will be made available for public viewing on the Council’s website.
- 11.2 The Council will then submit the Submission version of the Local Plan for examination by an independent Government appointed Planning Inspector. The Submission version will be approved by a meeting of the full Council which is expected to happen in July 2019. Consultation response forms received for this Local Plan Pre-Submission Publication document and the updated evidence base studies will be passed to the Planning Inspector. It should be noted that only those who make a representation seeking a change to the plan within the advertised publication consultation period will have the right to appear at the Examination.
- 11.3 The Council anticipates that an examination in public will be held on the Local Plan in late 2019 with adoption of the Local Plan taking place in 2020. However, the timetable after submission is beyond the Council’s control and will be in the hands of the Government appointed Planning Inspector.

Appendix A – List of Consultees

Specific Consultees

Wyre Forest District Parish/Town Councils

Bewdley Town Council
Broome Parish Council
Chaddesley Corbett Parish Council
Churchill and Blakedown Parish Council
Kidderminster Foreign Parish Council
Kidderminster Town Council
Rock Parish Council
Rushock Parish Council
Stone Parish Council
Stourport on Severn Town Council
Upper Arley Parish Council
Wolverley & Cookley Parish Council

Adjacent Parish Councils

Abberley Parish Council
Alveley and Romsley Parish Council
Astley & Dunley Parish Council
Bayton Parish Council
Belbroughton and Fairfield Parish Council
Clent Parish Council
Cleobury Mortimer Parish Council
Dodford with Grafton Parish Council
Elmbridge Parish Council
Elmley Lovett Parish Council
Hagley Parish Council
Hartlebury Parish Council
Highley Parish Council
Kinlet Parish Council
Kinver Parish Council
Lindridge Parish Council
Mamble Parish Council
Pensax Parish Council
Shrawley Parish Council
Upton Warren Parish Council

Other Specific Consultees

British Telecom
Birmingham City Council
Bromsgrove District Council
Dudley Metropolitan Borough Council
EE
Environment Agency
Greater Birmingham and Solihull Local Enterprise Partnership
Hereford & Worcester Ambulance Service
Hereford & Worcester Fire & Rescue Service

Appendix A – List of Consultees

Highways England
Historic England
Homes England
Malvern Hills District Council
National Grid
Natural England
Network Rail
NHS England
Office of Rail Regulation
Redditch Borough Council
Sandwell Council
Severn Trent Water
Shropshire Council
Solihull Council
South Staffordshire District Council
South Staffordshire Water Plc
Staffordshire County Council
Staffordshire Police Authority
The Coal Authority
Three
Vodafone and O2
Walsall Council
West Mercia Police
West Midlands Ambulance Service
Western Power Distribution
Wolverhampton City Council
Worcester City Council
Worcestershire County Council
Worcestershire Local Enterprise Partnership
Worcestershire Clinical Commissioning Groups
Worcestershire Regulatory Services
Wychavon District Council

General Consultees

Organisations and individuals registered in the Planning Policy database including:

Agents
Business and Commerce Groups
Conservation Interest Groups
Developers
Housing Interest Groups
Individuals
Interest / Pressure Groups
Land Owners
Local Interest Groups
Registered Providers

Appendix A – List of Consultees

Service Providers

Hard to Reach Groups

Age UK Wyre Forest

Derbyshire Gypsy Liaison Group

Friends Families and Travellers

National Federation of Gypsy Liaison Groups

Offmore Comberton Action Group

The Showman's Guild of Great Britain Midland Section