

Matter 1 – Dr Peter King for Hagley Parish Council 231697

Q.1.1-1.3

1. Hagley Parish Council (HPC) considers that the Plan is unsound (and/or not legally compliant) because it tends to increase the burden on highway infrastructure in Hagley that is already overloaded. In order to be sound, the Plan ought to provide through its Community Infrastructure Levy to provide funding to resolve the difficulty or at least mitigate for it. A456 between the Hagley Island (roundabout) and the Cross Keys junction (where A456 meets A450) is heavily overloaded at peak times.
2. Mitigation measures currently proposed consist of:
 - a. Changes to traffic lights (funded by Worcestershire LEP), which will merely restore the situation at the junction with B4187 Worcester Road to what it was before it was altered a few years ago, without alleviating the longstanding problem. The previous alteration was carried out by an engineer who used incomplete or otherwise defective traffic data, by failing to realise that a significant amount of traffic using A456 Worcester Road, Hagley forked left on to B4187 Worcester Road). The needs of local traffic to access the village centre mean that these traffic lights must have phases allowing traffic to turn in all possible directions on this three-arm junction. The junction in fact has five arms, but two of these have no exit on to A456. This is a useful change, which we support but will have a very limited positive impact.
 - b. The provision of a large car park at Blakedown station may divert some commuters on to the railway, but the likely effect of this (though welcome) is likely to be no more than *de minimis* in comparison with the volume of traffic using A456 through Hagley.
3. The plan could be made sound by reducing the housing target to a level where no more Wyre Forest residents would commute into Birmingham or the eastern part of the Black Country, by car through Hagley.
4. Further detail of this appears as part of the submission under Matters 2 and 11.

Q1.4

1. BDC has raised these issues with WFDC and despite considerable discussion there has been no resolution. The Statement of Common Ground between WFDC and BDC sets out specific areas of disagreement (Document SD-10b). Hagley supports BDC in its stance. Hagley has sought to engage with WFDC and has, on various occasions, sought meetings; these approaches have not had any positive response from WFDC.
2. In its *Transport demand in the Hagley Area* report,¹ WCC estimates that, in the 2036 morning peak hours, the WFLP developments will generate 2808 trips in total. And that 234 (8.3%) of these trips will interact with the “Hagley Network”. In the afternoon peak hours 191 (7.9%) additional trips through Hagley will be generated. We find these figures very hard to believe, and they are modelled using 2011 Census results which indicated that Wyre Forest was a “relatively contained economy” with 56% of residents commuting

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http://www.worcestershire.gov.uk/download/downloads/id/12238/transport_demand_in_the_hagley_area_january_2020.pdf

from Wyre Forest to elsewhere within Wyre Forest. We believe that these numbers are out of date and that a lot may have changed over the intervening period. However, please note that even using these numbers the A456/A450 junction in Hagley will exceed capacity in the 2036 morning peaks and is very close to capacity in the 2036 afternoon peaks (Jacobs *A450 Corridor Enhancement Report* [IFT04]; 4.5.2)

3. We believe that the problem of old data, which there has been no attempt to update, is a common one underlying this whole issue. In its own papers, the *WFDC Infrastructure Delivery Plan* [IFT01] and the *WF Local Plan Review – Transport Evidence* [IFT02], WFDC accept that the base model used is now over 7 years old “*meaning that the data is now considered outdated unless it can be proven that the travel patterns and their distribution have not changed.*” They further state that “*the existing model should not therefore be used for any major scheme appraisal but it can be used for non major schemes although it recognises that these may be at risk and open to challenge owing to model age, but could still be used in the early stages of assessment but with the likelihood of an update to the evidence requested by the decision making body.*” (Our emphasis). No such update has been undertaken. We suggest that a local plan and its implications for surrounding areas is certainly a major scheme and that therefore an appropriate update is required before the Plan can be approved.
4. Furthermore, as part of its response to WFDC, BDC commissioned Mott Macdonald to review of the WFLP – Transport Evidence [IFT02], and the subsequent WCC report Transport Demand in the Hagley Area [note 1]. Its findings are summarised in the report as follows:²

“There are a number of issues identified in the report, including:

1. Lack of validation of the 2011 base year to current traffic conditions. The report mentions Present Year Validation but does not undertake this assessment to determine the suitability of the WFTM.
2. Only one forecast scenario year. Changes in traffic flows cannot be determined.
3. Lack of analysis on the impacts on key routes within Bromsgrove.
4. Does not clearly state how the mitigation measures have been developed and on what basis.
5. There is data presented in the report that is either incomplete or does not provide a clear purpose

After a review of the TDHA report and other reports listed above, we further conclude that:

6. There is still a lack of evidence of the validation of the 2011 base year to current traffic conditions and there is no further detail about the suitability of the WFTM to assess the Wyre Forest Local Plan.
7. Whilst information on forecast year scenarios ‘with’ and ‘without’ the Local Plan is provided, changes in traffic flows relative to the base year cannot be determined.
8. There is no further analysis on the impacts on key routes within Bromsgrove.
9. The analysis within the TDHA report for Hagley is sparse.
10. No further clarity has been provided on how the proposed mitigation measures have been developed and there is no WFTM scenario in which they are included.

² Technical Note as presented to Bromsgrove District Cabinet for meeting on 6 July 2020
<https://moderngovwebpublic.bromsgrove.gov.uk/documents/g3468/Public%20reports%20pack%2008th-Jul-2020%2018.00%20Cabinet.pdf?T=10> p.113-8 [p.119-24 of PFD file]

In order to better assess the WFTM and therefore the implications of the modelled results, we recommend obtaining and reviewing the following information from or related to the WFTM:

- *Model Validation Report;*
 - *Details on a present year validation, if this was undertaken (and if not initiate this exercise);*
 - *Data Collection Report;*
 - *Evidence to show at which stages a VDM (Variable Demand Model) run was undertaken;*
 - *Uncertainty Log;*
 - *Model Forecasting Report;*
 - *Select Zone Analysis with details about which developments correspond to model zones and the number of trips generated for each development;*
 - *Flow difference plots between the 'with' and 'without' local plan scenarios that show total traffic flow; and*
 - *Journey time analysis."*
6. We believe that this reinforces our point that the traffic data used in the local plan is unsound and should be reviewed. There is also only a 2036 forecast for traffic; there is no forecast growth over the period from today and, as we know, no demonstrated validation of the 2011 data to current traffic conditions has been tabled, this means that there is no agreed traffic forecasts from 2011 to 2036. We find this extraordinary and would suggest that this is essential for sound planning.
 7. We do appreciate that the COVID-19 pandemic makes future traffic forecasting more difficult. There are two conflicting influences on traffic numbers as a result of the pandemic; one is the move towards more home working, and the second is the desire not to travel by public transport. We will not know how these two influences play out for many, many months and our view is that, until that is clear, we should not make any adjustments for this.
 8. We believe that it is essential that WFDC co-operate with BDC and answer the issues raised by Mott Macdonald.