

## Statement of Common Ground between Wyre Forest District Council, Worcestershire County Council and Bromsgrove District Council

### 1) Introduction

Under the National Planning Policy Framework (NPPF, 2019), strategic policy making authorities, such as local planning authorities, should produce, maintain and keep up to date a Statement of Common Ground (SofCG) to highlight agreement on cross boundary strategic issues with neighbouring local authorities and other relevant bodies.

This SofCG has been produced to support the submission of the Wyre Forest District Local Plan. It sets out how Wyre Forest District Council has engaged with Bromsgrove District Council in order to fulfil its Duty to Cooperate requirements. As the highways authority, Worcestershire County Council has also been jointly included in the Duty to Cooperate discussions and the preparation of this SofCG.

### 2) Parties Involved

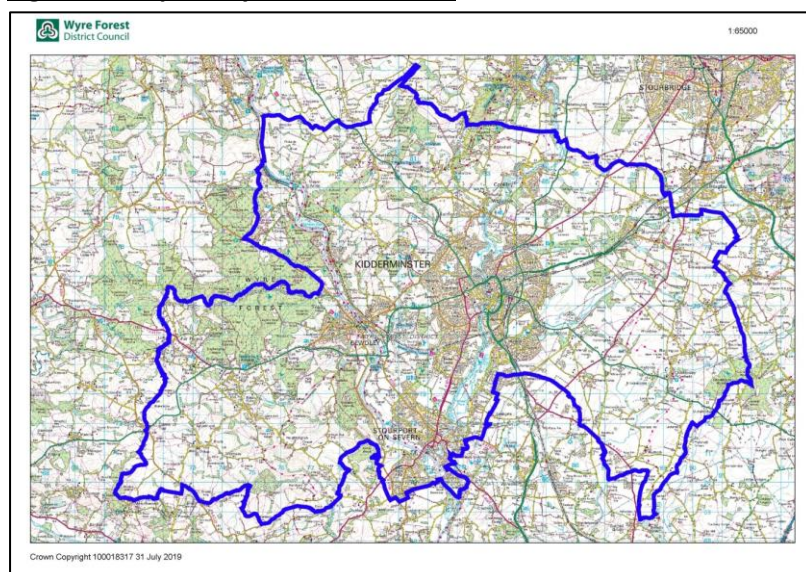
This SofCG has been prepared jointly by Wyre Forest District Council (WFDC), Worcestershire County Council (WCC) and Bromsgrove District Council (BDC). WCC is the highways authority for both Wyre Forest District and Bromsgrove District.

The SofCG covers those matters agreed and disagreed by the parties with regards to the proposed Wyre Forest District Local Plan (2016-2036), in order to fulfil the Duty to Cooperate requirements as outlined in paragraph 27 of the NPPF.

### 3) Strategic Geography

This SofCG covers all of the Wyre Forest District and has been produced for the purposes of the Wyre Forest District Local Plan (2016-2036), which is due to be submitted to the Planning Inspectorate in Spring 2020. Figure 1 below shows the district boundary of Wyre Forest District.

**Figure 1: Map of Wyre Forest District**



#### **4) Background / Duty to Cooperate**

There has been ongoing engagement between WFDC, BDC and WCC throughout the preparation of the WFDC Local Plan Review. WFDC has consulted with BDC and WCC at every stage of plan making. The Local Plan Review consultation periods were as follows:-

- Issues and Options Consultation – September / October 2015
- Preferred Options Consultation – June / August 2017
- Pre-Submission Consultation – November / December 2018
- Pre-Submission Consultation (re-opening) – September / October 2019

Joint Duty to Cooperate meetings between WFDC, WCC and BDC have taken place on the following dates:-

- 19<sup>th</sup> October 2017
- 26<sup>th</sup> June 2018
- 20<sup>th</sup> November 2018
- 6<sup>th</sup> February 2019
- 13<sup>th</sup> March 2019
- 30<sup>th</sup> July 2019
- 1<sup>st</sup> October 2019 (telephone conference call)
- 14<sup>th</sup> November 2019
- 7<sup>th</sup> January 2020
- 19<sup>th</sup> March 2020 (telephone conference call)
- 2<sup>nd</sup> April 2020 (telephone conference call)

Minutes of the meetings can be viewed in Appendix 1.

In addition to the above meetings, there have also been a number of Worcestershire Planning Officer meetings throughout the plan making period, at which lead Planning Policy Officers from each of the Worcestershire Local Authorities attended to discuss Local Plan Reviews and duty to cooperate issues.

WFDC also held a Wyre Forest Local Plan Transport meeting on 7<sup>th</sup> February 2017 with officers from BDC and WCC to discuss the infrastructure requirements for the plan prior to the Preferred Options consultation.

WFDC attended a BDC Highway Meeting at Bromsgrove District Council on 30<sup>th</sup> May 2018. Officers from WCC were also present at this meeting. The minutes of the meeting can be found in Appendix 1.

## 5) Strategic Matters Identified

Bromsgrove District Council did not respond to the WFDC Issues and Options consultation undertaken in 2015.

WFDC had held a meeting on 7<sup>th</sup> February 2017 prior to the preferred options consultation (which commenced in June 2017), to discuss the Wyre Forest local plan transport infrastructure requirements with BDC and WCC (the highways authority). BDC responded to the WFDC Local Plan preferred options consultation that was undertaken in June / August 2017. Appendix 2 shows the response received from BDC. The main concerns set out in BDC's response related to the evidence base which supported the allocations and in particular the transport evidence. BDC acknowledged that some consideration had been given to transport issues in the Infrastructure Delivery Plan (IDP), but they were concerned that a preference for a preferred option was being sought without all the transport modelling evidence being available. Subsequent to the 2017 Preferred Options consultation detailed transport modelling was undertaken by WCC with regard to site allocations and the results of which were consulted on during the 2018 Pre-Submission consultation.

BDC responded to the WFDC Local Plan Pre-Submission consultation that was undertaken in November / December 2018. Appendix 3 shows the response received from BDC.

BDC also responded to the WFDC re-opening of the Local Plan Pre-Submission consultation that was undertaken in September / October 2019. Appendix 4 shows the response received from BDC.

For both the 2018 and 2019 consultations, the strategic matters raised by BDC relate to transport issues. The matters of disagreement are set out in section 6 of this Statement of Common Ground.

## 6) Matters of disagreement

Table 1 and 2 below shows the matters of disagreement raised by BDC to the 2018 and 2019 consultations (regulation 19) to the Wyre Forest Local Plan (2016-2036). For the purposes of this SofCG, the tables also include a written response from WFDC and WCC, in 2020, to these disagreements raised by BDC. The numerous DtC meetings were also used as an opportunity for BDC to discuss their disagreements in detail with WFDC and WCC.

Table 1: Matters of disagreement from the 2018 consultation (regulation 19)

	<b>Issues raised by BDC to the 2018 consultation (Reg 19)</b>	<b>WFDC / WCC Response (SofCG 2020)</b>
BDC (2018 response)	6.1 - It is the view of Bromsgrove District Council (BDC) that unfortunately the Wyre Forest Local Plan (WFLP) is unsound, BDC do not consider that the plan is justified, effective or consistent with National Policy.	WFDC is disappointed that BDC considers the WF Local Plan to be unsound.
BDC (2018 response)	6.2 - The objection focuses on Policy 12 – Strategic Infrastructure and Policy 13 – Transport and Accessibility in Wyre Forest and the evidence base which	Comments noted.

	purports to support them, most notable the Infrastructure Delivery Plan (IDP) and the Transport Modelling Report (TMR).	
BDC (2018 response)	<p>6.3 - Para 16 of the NPPF requires that plans should:</p> <p><i>b) be prepared positively, in a way that is aspirational but deliverable;</i></p> <p><i>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</i></p> <p>Policy 12 is a generic policy for the requirement of infrastructure to support the plan, and Policy 13 begins to provide more detail on what infrastructure is required. It is the view of BDC that policies 12 and 13 fail to satisfy b) and d) of the framework. For the reasons expanded on in the paragraphs 6.6 to 6.20 below concerning the evidence base, BDC fail to see how the infrastructure requirements are deliverable. BDC also fails to see and how the policy is clear and unambiguous on what infrastructure is required, and when and how it is to be delivered. Of particular concern in relation to the clarity of the policy are the inconsistencies between the IDP requirements and the requirements in the policy.</p>	<p>Reference to NPPF is noted. WFDC does not think that the consultation response from BDC explains clearly what their concerns are with Policy 12 and 13 in relation to NPPF Para 16 b &amp; d. The consultation response merely quotes the NPPF paragraphs and does not articulate in any detail why BDC consider the policies to be unclear, ambiguous and not deliverable.</p> <p>WFDC do not consider any change is necessary to Policy 13 in response to the BDC comments. However, Policy 12 could be used to secure mitigation if the Inspector considers this to be necessary. WFDC suggest the following potential modification to Policy 12, to be considered by the Inspector:</p> <p><b><u>D.) Where appropriate, planning obligations will be required to fund infrastructure projects that are directly related to specific development, including but not limited to affordable housing, transport, green infrastructure, education, health and other social infrastructure.</u></b></p>
BDC (2018 response)	<p>6.4 - Para 20 of the NPPF states:</p> <p>Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:</p> <p><i>b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</i></p> <p>It is BDCs view that the concerns expressed about the evidence at para's 6.6 to 6.20 identifies that the WFLP and its evidence base does not at this stage</p>	<p>Reference to NPPF is noted. Merely quoting paragraphs from the NPPF is not enough to explain why the WF Local Plan is inconsistent with national policy.</p>

	clearly identify in a robust manner the infrastructure required or the impacts of the infrastructure, and therefore the plan is inconsistent with the requirements of para 20 of the NPPF.	
BDC (2018 response)	<p>6.5 - Para 104 of the NPPF states Planning policies should:</p> <p><i>b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;</i></p> <p><i>c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;</i></p> <p>It is BDCs view that in relation to b) and c) above that issues identified with the evidence base at paras 6.6 to 6.20 below shows, that there is not robust evidence which has allowed for any routes to be identified and protected for the bypasses in relation to Hagley and Mustow Green. And that lack of robust evidence, which also include un-costed schemes in the IDP, does not allow for a sufficient strategy for investment in infrastructure to be developed and aligned, therefore the WFLP is not consistent with the requirements of para 104 of the NPPF.</p>	<p>Comments noted.</p> <p>WCC have worked with WFDC throughout the development of the WFDC Local Plan including in the development of the IDP and the transport evidence.</p> <p>Worcestershire County Council is the highway authority and is content with the WF Local Plan, the IDP and the transport evidence (which they prepared). WFDC and WCC consider the evidence to be robust. Therefore, WFDC has met the requirements of NPPF paragraph 104 b &amp; c.</p>
BDC (2018 response)	6.6 - Paras 6.3 to 6.5 above show how the policies in the WFLP are inconsistent with the requirements of the NPPF, BDCs soundness concerns are also related to the ability of the WFLP to be judged as being justified and effective, this primary concern relates to the evidence base supporting Policies 12 and 13.	Disagree. Paragraphs 6.3 to 6.5 merely quote paragraphs from the NPPF and do not explain clearly and in detail why BDC consider the policies in the WFLP are inconsistent with the NPPF. In their response para 6.3 states <i>“For these reasons expanded on in paragraph 6.6 to 6.20 below concerning the evidence base, BDC fail to see how the infrastructure requirements are deliverable.”</i> Yet, when the reader reaches para 6.6 it states <i>“Para 6.3 to 6.5 above show how the policies in the WFLP are</i>

		<i>inconsistent with the requirements of the NPPF...". BDC has failed to articulate clearly in their consultation response to WFDC exactly why Policy 12 and 13 are considered by them to be inconsistent with the NPPF. Merely quoting paragraph numbers from the NPPF is not a satisfactory method of expressing NPPF inconsistencies.</i>
BDC (2018 response)	<p>6.7 - It appears from the published evidence base the main supporting evidence for the transport and infrastructure policies in the WFLP are the IDP and the TMR. Reference is made in both May 2017 and October 2018 versions of the IDP to a transport evidence paper. It has been confirmed by Wyre Forest District Council (WFDC) that there is no transport evidence paper. The May 2017 IDP also states:</p> <p><i>It should also be noted that local impacts of individual potential development sites can be more easily identified; however, the cumulative impact of development on both the local and wider strategic network is difficult to quantify without undertaking modelling. As detailed above, the WFTM will be used to fully assess all development sites, both individually and cumulatively, to ensure a robust assessment of the likely transport related infrastructure is identified and all appropriate multimodal infrastructure identified to support the preferred option.</i></p> <p>For the reasons expanded on below BDC, do not consider that this stated intention of the previous version of the IDP has been undertaken.</p>	<p>Comments noted. WCC have worked with WFDC following the 2018 Pre-Submission consultation to undertake further transport modelling to inform the evidence base and IDP.</p> <p>The updated transport evidence and revised IDP were consulted on during the re-opened Pre-submission consultation which took place in 2019.</p>
BDC (2018 response)	<p>6.8 - The WFLP contains development allocations across the District, there are some significant allocations to the eastern and north eastern side of Kidderminster. These sites have been in the public domain for a considerable period of time, and were part of the preferred options presented by WFDC. BDC responded to the preferred option plan, expressing concern about the possible implications of development in</p>	<p>Disagree. A considerable amount of evidence has been produced to support the WFDC Local Plan Review. This evidence base includes the Green Belt review, the Housing &amp; Economic Land Availability Assessment, the Site Selection Paper, the Settlement Hierarchy Technical Paper, the Sustainability Appraisal etc. As part of the evidence base, WFDC has worked closely with WCC to produce some transport technical documents that have modelled</p>

	these locations on transport infrastructure in Bromsgrove. At the time BDCs concern was the lack of evidence to allow BDC to make an informed decision on the implications for the district. Sadly little work appears to have been done to strengthen the evidence base and therefore BDCs concern remains.	and tested the site allocations robustly in terms of the impact on the transport network during the plan period up to 2036. The evidence base studies produced as part of the review process has informed the sites allocated in the draft Local Plan (2016-2036). WFDC has set out in the draft Local Plan (2016-2036) what it considers to be 'an appropriate strategy' for Wyre Forest District (NPPF para 35b). This appropriate strategy for the district has been approved by WFDC Members.
BDC (2018 response)	<p>6.9 - Turning specifically to the Transport Modelling Report (TMW) BDC has concerns that:</p> <ul style="list-style-type: none"> <li>a) The Wyre Forest Transport model is a multi-modal model but only the highway assignment model has been used.</li> <li>b) There is a mis-match between the development assumptions in the Wyre Forest Local Plan Review (2016-2036) – Transport Modelling Report and the Wyre Forest District Council IDP.</li> <li>c) A simplistic approach to trip generation has been adopted. A single rate assumed for all residential development and a single rate assumed for all job employment types.</li> <li>d) It is not clear whether there has been any optimisation of the highway network in the future year network.</li> <li>e) There is no definition provided of "capacity" or "congestion".</li> <li>f) In the Appendix, information on housing is not provided for mixed use development. Housing capacity is provided for residential areas, but the number of jobs assumed for employment is not provided.</li> </ul>	<p>Comments noted. Some anomalies and inconsistencies were identified within the modelling work undertaken for the 2018 Pre-Submission consultation. These have been addressed and corrected in the 2019 modelling work undertaken.</p> <p>The updated transport evidence and revised IDP were consulted on during the re-opened Pre-submission consultation which took place in 2019.</p> <p>All of the concerns raised here by BDC have been addressed in the 2019 transport modelling and were made available in the re-opened consultation.</p>
BDC	6.10 - In relation to the Wyre Forest	The Chapter 3 of the IDP Physical

(2018 response)	<p>District Council IDP, the following observations are made:</p> <ul style="list-style-type: none"> <li>a) There is a mis-match between the development assumptions in the Wyre Forest Local Plan Review (2016-2036) – Transport Modelling Report and the Wyre Forest District Council IDP.</li> <li>b) No reference to modelling 5 years ahead, albeit the IDP refers to national guidance that states that the IDP should be clear for at least 5 years ahead.</li> <li>c) There is reference to options consultation but no reference to modelling of options.</li> <li>d) The document states that where the deliverability of critical infrastructure is uncertain alternative strategies should be assessed. It is not clear if the testing of alternative strategies has been undertaken in the (highway) modelling.</li> <li>e) There is no definition provided of “capacity” or “congestion”, so it is not clear how infrastructure needs have been identified.</li> <li>f) Not clear how network capacity has been maximised albeit the document states that there is a need to demonstrate that capacity has been maximised.</li> <li>g) Not clear on how infrastructure needs have been identified as there is no reference provided to an appraisal or sifting process or definition of need.</li> </ul>	<p>Infrastructure clearly sets out any assumptions which have been made in the assessment of required infrastructure. It is a living document and subject to regular updating as new evidence becomes available and as the plan is implemented.</p> <p>The IDP sets out a series of infrastructure requirements based on both the transport modelling which has been undertaken, and WCC assessment of the sites as the highways authority taking into account their knowledge of the network in both Wyre Forest district and wider, experience of development and mitigation and the traffic management data available to WCC.</p> <p>The IDP is not the document for a detailed discussion on transport modelling.</p>
BDC (2018 response)	<p>6.11 - The reason why these elements are a concern and lead to a conclusion of unsoundness relates to the identification of additional congestion on the A456 through Hagley in Bromsgrove. Also the identification of additional congestion on the A448 at Mustow Green which the main route between Bromsgrove and Kidderminster is a similar concern. Both these locations have now been identified as requiring bypasses. It must be stated that in principle BDC does not necessarily</p>	<p>Comments noted.</p> <p>Subsequent to the 2018 Pre-Submission consultation further detailed work was undertaken by WCC with regard to these allocations and the results of this have been used to inform subsequent revisions to the IDP.</p> <p>The updated transport evidence and revised IDP were consulted on during the re-opened Pre-submission consultation which took place in 2019.</p>



	<p>object to these bypass proposals, providing they are underpinned by robust evidence of need, and more importantly delivery. But for BDC to get to this position it needs to be clear that these proposals are the correct form of mitigation when considered against other options in these locations, and it needs to be clear what the wider cumulative impacts of these proposals are on transport infrastructure. This is important because once the need for them is robustly established; it needs to be clear how these and other proposals will be funded and delivered in a coordinated way. The WFLP requires infrastructure to align with allocated development as they progress to provide the correct mitigation, although it does appear no actual phasing appears in the plan. BDC is unable to establish that a robust process has been undertaken in identifying these schemes as the correct schemes. BDC is also unable to form any view based on the evidence of the likelihood of these schemes being enabled or delivered by the WFLP.</p>	
<p>BDC (2018 response)</p>	<p>6.12 - In more detail BDC cannot understand the assessment process that has been undertaken to determine the bypass is needed. The adopted Local Transport Plan 4 LTP4 highlights that a review of the junctions in Hagley should take place, to be funded by developers and the LTP. Notwithstanding the technical concerns highlighted at para 6.8 above, the results of the TMR appears to show further congestion in Hagley. The LTP4 junction review requirement appears to have now been superseded by a bypass, there appears to be no evidence to support the need other than the model report. The IDP states <i>"Using this information WCC have been able to undertake an assessment of the probable impact on the local and wider network and produce a list of the infrastructure required to support the level of growth. This assessment has been undertaken using the Wyre Forest Transport Model (WFTM)."</i> The TMR</p>	<p>Comments noted.</p> <p>Subsequent to the 2018 Pre-Submission consultation further detailed work was undertaken by WCC with regard to these allocations and the results of this have been used to inform subsequent revisions to the IDP. Two further papers have been produced; The A450 Corridor Enhancement Report and the Transport Demand in Hagley both of which provide the detailed assessments and justification for the proposed mitigation.</p> <p>The revised IDP and the A450 Corridor Enhancement Report were consulted on during the re-opened Pre-Submission consultation held in 2019.</p> <p>The Transport Demand in Hagley Area has been produced by WCC as a background paper to this Statement of Common Ground. (See Appendix 6).</p>

	<p>does not mention the mitigation required, it simply shows where the network is affected by development, there are no other published reports referencing the WFTM. Therefore trying to work out how all the schemes have been assessed based on the published evidence. The same applies to the Mustow Green scenario where a junction enhancement scheme has been replaced with a bypass. Policy 13 of the WFLP still refers to a junction enhancement scheme, this is the inconsistency referred to at para 6.3 above.</p>	
<p>BDC (2018 response)</p>	<p>6.13 - It is a fact that the IDP schemes haven't been modelled for their impact, as they are not referenced in the TMR. So it is unclear not only what impact a Hagley bypass will have in reducing congestion in Hagley but it is not clear what impact a Hagley bypass might have on other locations, these impacts maybe both positive and negative. The same can be said for the bypass around Mustow Green. For example the Mustow Green Scheme might have an impact on Bromsgrove Town if it increases the volumes which are able to use the A448. Similarly the enhancement scheme on the A450 corridor might have an impact on Hagley if it improves the attractiveness of this route, how would / has that then be factored into the bypass proposals at Hagley. It is accepted that transport planning / modelling is not an exact science, and there will always be impacts of schemes which will not be able to be quantified. In this instance again appears to be is no work which attempts to identify how all these transport schemes work together to mitigate the cumulative impacts of all the developments in Wyre Forest. For these reasons alone BDC does not feel that the WFLP is sound, as key proposals required both within the district but also outside are not robustly justified.</p>	<p>Comments noted.</p> <p>Subsequent to the 2018 Pre-Submission consultation further detailed work was undertaken by WCC with regard to these allocations and the results of this have been used to inform subsequent revisions to the IDP. Two further papers have been produced; The A450 Corridor Enhancement Report and the Transport Demand in Hagley both of which provide the detailed assessments and justification for the proposed mitigation.</p> <p>The revised IDP and the A450 Corridor Enhancement Report were consulted on during the re-opened Pre-Submission consultation held in 2019.</p> <p>The Transport Demand in Hagley Area has been produced by WCC as a background paper to this Statement of Common Ground. (See Appendix 6).</p>
<p>BDC (2018 response)</p>	<p>6.14 - It could be seen as strange that BDC are objecting to a plan which on the face of it is providing a solution to a known issue; congestion in Hagley. The</p>	<p>Comments noted.</p> <p>For clarity, a Hagley Bypass is not being proposed by the WFDC Local Plan.</p>

	<p>robust justification for a scheme is directly related to the ability to implement the required scheme. Therefore BDC cannot support the plan if, the need for the scheme is not justified to the extent that its ability to be implemented becomes clear and deliverable.</p>	
<p>BDC (2018 response)</p>	<p>6.15 - The Hagley bypass scheme as identified in the IDP does not have a cost associated with it, the Mustow Green bypass scheme has a £12 million cost associated with it. Neither scheme as far as BDC can ascertain has got a plan which shows the alignment of the road or any technical considerations. Purely by looking at a map, a bypass around Mustow Green would appear to be a shorter piece of road than a bypass around Hagley. Therefore we can only assume that the Hagley scheme will be in excess of £12 million, this is a significant amount of funding which does not have any certainty at this stage. BDC acknowledge that this is a very crude assumption to make on cost, and there are many issues such as underground services etc which can significantly affect the final amount. It is also accepted that as the detail of schemes are worked up more detailed cost estimates can be made. It appears the costs that have been used to inform the viability work, which is part of the evidence base to the plan, are not reflective of or have been informed by these schemes. The approach in the viability work is to use a typical infrastructure cost. However in this instance this typical cost cannot account for all the typical or abnormal costs, as so many of them are yet to be identified.</p>	<p>Comments noted.</p> <p>Subsequent to the 2018 Pre-Submission consultation further detailed work was undertaken by WCC with regard to these allocations and the results of this have been used to inform subsequent revisions to the IDP. Wherever estimated costs are used this is clearly acknowledged in the IDP, which is not an unusual approach. To provide detailed costs for schemes in itself requires considerable financial investment in feasibility, options appraisal and site assessments which would incur considerable cost. These will be undertaken as appropriate when mitigation is required as development comes forward. Use of a typical infrastructure cost is not unusual and provides a guide as to likely costs, accepting that there may be abnormal costs within a scheme. It is also of note that any proposal for a Hagley bypass would be in Bromsgrove, so could not include an allocation or indicative route in the WFDC plan. Subsequently, two further papers have been produced; The A450 Corridor Enhancement Report and the Transport Demand in Hagley both of which provide the detailed assessments and justification for the proposed mitigation.</p> <p>The revised IDP and the A450 Corridor Enhancement Report were consulted on during the re-opened Pre-Submission consultation held in 2019.</p> <p>The Transport Demand in Hagley Area has been produced by WCC as a background paper to this Statement of Common Ground. (See Appendix 6).</p>
<p>BDC (2018 response)</p>	<p>6.16 - It is noted at para 12.3 of the WFLP that:</p> <p><i>The Council will consider wider</i></p>	<p>Comments noted.</p>

	<i>infrastructure funding streams as part of the Local Plan Review process and in due course will consider the introduction of a Community Infrastructure Levy in conjunction with the latest Planning Obligations SPD, as adopted by the Council in September 2016.</i>	
BDC (2018 response)	6.17 - BDC do not understand why the consideration of infrastructure funding streams would be left for a plan review to decide. This wording appears verbatim in the preferred option version of the plan and therefore maybe a drafting error. If this is the case then it would suggest that this plan should have considered the funding streams. BDC cannot see where this has been done with any rigour. If a CIL is the mechanism to fund the plans infrastructure, then it would need to be clearly timetabled, and then progressed in line with that timetable to ensure the benefits of having a CIL are realised from all the development in the plan. This would appear to be key for WFDC so many infrastructure schemes have been identified. The Local Development Scheme states that the position on a CIL will be considered alongside the preparation of the pre-submission plan. There is no timetable for the production of a CIL and WFLP does not clarify the position on CIL. The inconsistent costing information and complete lack of costing in relation to the Hagley bypass, and an uncertain policy regime about infrastructure delivery casts doubt on the funding of a bypass for Hagley.	<p>Agree that there is a slight drafting error in paragraph 12.3 of the Plan. This error is to be corrected in the Table of Additional (Minor) Modifications to the Local Plan.</p> <p>For clarity, a Hagley Bypass is not being proposed by the WFDC Local Plan.</p>
BDC (2018 response)	6.18 - The IDP has a lot of high cost schemes in it, and a lot of possibly expensive schemes which have yet to be costed, including the Hagley bypass. If the evidence isn't robust to support the specific requirement for these schemes as a result of development, the likelihood of them being funded by developers or other mechanisms such as Central Government or LEP money is uncertain. Where there are lots of competing schemes it is expected that funding normally will be directed at	<p>Comments noted, subsequently a further paper has been produced "Transport Demand in Hagley".</p> <p>The IDP provides clarity of the gap between estimated developer contributions and the cost of infrastructure in support of the plan. WCC has expressed concern in their response with regard to viability. Notwithstanding these comments WCC have a good track record of working with the funders such as Central Government and the LEPs to secure funding for large</p>

	<p>those which provide the greatest direct benefit, such as enabling housing development or providing for economic activity. From the information provided BDC has no way of understanding how much development from specific allocations impacts on Hagley to justify the bypass. This lack of information then makes it impossible to understand the likely level of developer contribution, and therefore if not fully developer funded the likely amount of other funding required. Without being able to understand how much housing and economic development proposals such as the bypass enable, it is impossible to form a view on the likely applicability to the funding streams that are available to infrastructure providers.</p>	<p>infrastructure schemes including both highways, active travel and rail bases. We will continue to work with WFDC to secure external funding where ever possible for the schemes identified in the IDP, alongside developer contributions.</p>
<p>BDC (2018 response)</p>	<p>6.19 - It is accepted that funding regimes are not fixed, and the change as government policy is amended, meaning different levels of finance become available. With that in mind BDC accepts that it is not possible to have complete certainty on these issues at this stage in the planning process. But without being able to quantify the impact of individual developments on the scheme being tabled as mitigation, and then being able to quantify the impact of the mitigation even at a basic level BDC fails to see how the plan can be seen as justified, and therefore also effective if the required funding for the mitigation remains such an unresolved issue.</p>	<p>WCC have a good track record of working with the funders such as Central Government and the LEPs to secure funding for large infrastructure schemes including both highways, active travel and rail bases. We will continue to work with WFDC to secure external funding where ever possible for the schemes identified in the IDP, alongside developer contributions.</p>
<p>BDC (2018 response)</p>	<p>6.20 - In conclusion it is regrettable that BDC has to object to the plan, but unless the mitigation required supporting the plan cannot be robustly evidenced, which in turn secures the ability for it to be delivered, it is the view of BDC that the plan is unsound as it is not justified, effective, and consistent with national policy.</p>	<p>Disagree. Both WFDC and WCC consider that the evidence that has been produced is robust and the Local Plan is sound.</p>
<p>BDC (2018 response)</p>	<p>7.1 - BDC consider that the wording of policies 12 and 13 could be amended to strengthen them and provide more clarity in relation to the mitigation required. But as the fundamental issue is with the evidence which underpins these</p>	<p>Disagree. BDC does not state why or how Policy 12 and 13 should be strengthened or why or how they lack clarity. WFDC have undertaken numerous Duty to Co-operate meetings with BDC, during which BDC have failed to elaborate on this issue and</p>

	<p>policies, without a more robust evidence base BDC do not consider this plan can be made sound with simple policy wording changes.</p>	<p>articulate clearly their concerns with these two policies. BDC did not make any suggested modifications.</p> <p>Both WFDC and WCC consider that the evidence that has been produced is robust and the Local Plan is sound.</p>
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**Table 2: Matters of disagreement from the 2019 consultation (regulation 19)**

	<b>Issues raised by BDC to the 2019 consultation (Reg 19)</b>	<b>WFDC / WCC Response (SofCG 2020)</b>
BDC (2019 response)	<p>BDC considers that the wording of policies 12 and 13 could be amended to strengthen them and provide more clarity in relation to the mitigation required. However, as the fundamental issue is with the evidence which underpins these policies, without more robust evidence base BDC still does not consider this plan can be made sound with simple policy wording changes.</p> <p>If it can be demonstrated clearly that the impacts of development are on infrastructure in Bromsgrove, then a clear policy requirement for the delivery of cross boundary infrastructure will need to be included in the plan.</p>	<p>Disagree. BDC does not state why or how Policy 12 and 13 should be strengthened or why or how they lack clarity. WFDC have undertaken numerous Duty to Co-operate meetings with BDC, during which BDC have failed to elaborate on this issue and articulate clearly their concerns with these two policies. BDC did not make any suggested modifications.</p> <p>Both WFDC and WCC consider that the evidence that has been produced is robust and the Local Plan is sound.</p>
BDC (2019 response)	1. The previous comments submitted by Bromsgrove District Council BDC in relation to this plan still stand, the comments below expand on those submitted previously.	See comments on 2018 response.
BDC (2019 response)	2. It remains the view of BDC that unfortunately the Wyre Forest Local Plan (WFLP) is unsound, BDC do not consider that the plan is justified, effective, or consistent with National Policy. It is also unfortunate that BDC also now raises concerns about whether the requirements of the Duty to Co-operate to have been met.	Disagree. WFDC has held numerous Duty to Co-operate meetings with both BDC and WCC (the highways authority) to discuss the BDC issues and identify solutions.
BDC (2019 response)	<p><u>Evidence concerns</u></p> <p>3. Without repeating the previous concerns verbatim the issue that BDC has is that it is still unclear as to what the transport impacts are, of the WFLP on Bromsgrove District. Concerns were expressed previously on the clarity of the</p>	<p>Comments noted.</p> <p>WCC disagree with this position and believe the IDP along with the Hagley Demand Report and A450 Corridor Report identify the likely impacts the growth will have on the Transport Network within Bromsgrove.</p>

	work provided to support the 2018 publication version of the plan. Although efforts have been made to address these concerns, the fact remains that from the published information it is, in the view of BDC, not possible to clearly see what the impacts of the development sites are, and then clearly understand the mitigation strategy.	
BDC (2019 response)	4. The need for a more robust transport evidence base has been something that BDC has been raising throughout the development of the WFLP. In response to BDCs November 2018 objection, further discussions took place in February and March 2019 where BDC continued to express its position, with WCC officers in attendance. It is BDCs understanding that these discussion in part led to the additional document that has been published, Wyre Forest Local Plan Review, Transport Evidence June 2019. It had been hoped that the content of this document would have addressed the previous concerns BDC raised but unfortunately it does not do this. This position of BDC is, and has always been, that the Council would like to be able to understand the impacts of the plan on the infrastructure within Bromsgrove District, and then to clearly understand how the proposed mitigation and its delivery has been arrived at.	Comments noted.  WCC have worked with WFDC to provide further clarity on the transport impacts of the WFDC local plan. A further modelling exercise has been undertaken on the discrepancy of allocated sites, and the Transport Evidence Base sets out the impacts of development in Wyre Forest District and the key corridors. Further specific reports have been produced as required for Hagley, A450 corridor and Blakedown to enhance understanding and support the interventions.
BDC (2019 response)	5. Unfortunately the Wyre Forest Local Plan Review, Transport Evidence June 2019 does not satisfy this information gap. It is the view of BDC that the document has flaws. The document at section 4 attempts to suggest that an assessment has been done to confirm that the model is fit for purpose. BDC does not see how any actual assessment has been done, and consider that it is not possible to make the conclusion at para 4.6 based on the information in the preceding section.	Comments noted.  Jacobs, WCC's Transport consultants have provided an assessment of the WFDC transport model, which confirms that it is suitable and appropriate to assess the WFDC local plan using this model and its evidence base.
BDC (2019 response)	6. A more significant concern is that although there is new information in this report, it is still not possible to ascertain from the information provided what the actual impact of development would be.	Comments noted.  The Transport Evidence Base sets out the impacts of development in Wyre Forest District and the key corridors, including trip

	<p>The document shows that flows and journey times will increase in many locations, but without a base year, or updated base year to compare against, all that can be concluded is that there will be more trips on the network. Without being able to compare a scenario where WFLP developments are not present, and where WFLP developments are present, understanding what the actual impacts of development are, is impossible.</p>	<p>generation.</p> <p>Further specific reports have been produced as required for Hagley, A450 corridor and Blakedown to enhance understanding and support the interventions proposed.</p>
BDC (2019 response)	<p>7. Another concern with this piece of evidence is that there is no modelling with any mitigation included. Therefore from the evidence available it is not possible to understand if the suggested mitigation in the Infrastructure Delivery Plan (IDP) actually mitigates both individual development sites and also the cumulative impacts of the WFLP.</p>	<p>The Hagley Demand Report identifies the growth will have little impact on the network with the Bromsgrove District and therefore no schemes for the area are included within the IDP.</p> <p>The A450 Corridor report identifies the impact growth will have on corridor. It also identifies the appropriate mitigation scheme and the results of the introduction of that scheme.</p>
BDC (2019 response)	<p><u>Infrastructure Delivery Plan</u></p> <p>8. Turning to the IDP the BDC position remains the same as previously expressed. The Council's previous concerns centered on the untested and in some cases un-costed schemes and proposals in the IDP. Whilst it is acknowledged that changes have been made to the IDP it is still unclear what the links are between the impact of development and the mitigation that is specified. This particular concern for the A456 through Hagley, where previous proposals for a bypass have been softened and the need for a wider review working with other councils seems to have replaced this proposal. BDC has no objection in principle to a wider review of transport infrastructure; indeed it would expect this consideration to come to the fore as the review of the Bromsgrove District Plan gathers momentum. However it is not considered appropriate at this stage to leave it to a wider infrastructure review to mitigate the specific impacts of the</p>	<p>Comments noted.</p> <p>Considerable further work has been undertaken to consider the A456 through Hagley which is set out in the additional paper "Transport Demand in Hagley". Further to this, WCC have also undertaken localised modelling in Hagley to assess options to address the current congestion which is separate to the WFDC local plan.</p> <p>Hagley is a significant highway junction on the major road network (MRN), which attracts traffic from a wider hinterland, which travels to both the strategic road network i.e. M5 and also north to Birmingham and Black Country conurbation. WCC have undertaken formal duty to co-operate discussions with the Black Country authorities regarding this junction and any possible impacts of both their local plan review and any transport proposals. The focus of their approach is to promote and extend public transport options within the conurbation. WCC also propose interventions to enhance the rail offer in Wyre Forest district to reduce the need to travel by car into the conurbation</p>



	<p>WFLP, should they ever be clearly identified, it maybe that the impacts are not significant to warrant such a review or if the impacts are proved to be significant, it is something which may be too late to address via plan making.</p>	<p>and beyond.</p> <p>In addition much of the demand at Hagley is not related to Wyre Forest, but is generated from a wider hinterland extending beyond Wyre Forest into the rural areas of Herefordshire, Shropshire etc.</p>
<p>BDC (2019 response)</p>	<p>9. It is also considered that the Duty to Cooperate and Statements of Common ground that BDC will prepare to support its plan are not the place to decide what infrastructure is required to support the developments in Wyre Forest, as para 3.1.21 of the IDP seems to be suggesting. It is the view of BDC that the infrastructure needs of the WFLP need to be clearly identified in the evidence that supports that plan, and mechanisms put in place to allow for any cross border infrastructure to be delivered. BDC has a strong track record of such an approach both working with Birmingham City Council on the Longbridge Area Action plan, and more recently in working with Redditch Borough Council in providing cross boundary allocations in Bromsgrove District to meet the needs of Redditch Borough.</p>	<p>Comments noted.</p> <p>Paragraph 3.1.21 of the IDP acknowledges the wider issues associated with the Hagley junction and that these are not matters which are solely within the control or remit of the WFDC local plan. WCC has undertaken discussions with the Black Country authorities, South Staffordshire and Bromsgrove to inform the approach to Hagley. The impact of proposals within the Shropshire Local Plan has also been reviewed.</p>
<p>BDC (2019 response)</p>	<p>10. Para 3.1.24 of the IDP discusses the rail enhancement taking place in Blakedown station. BDC does not have an objection in principle to this enhancement. However there are concerns with the following statement:</p> <p><i>‘Enhancements to parking facilities at Blakedown Station will also help to mitigate the impact of growth on Hagley within Bromsgrove District. Hagley currently suffers from congestion at peak times and this is considered to be a first step in reducing congestion before wider strategic improvements can be considered and implemented.’</i></p> <p>It is not clear how the addition or parking at this station combined with other strategies such as improving of the A450 corridor work together to reduce</p>	<p>Comments noted.</p> <p>WCC has commissioned their rail consultant SLC Rail to undertake a study of options for the enhancement of Blakedown Station. This background paper has been published.</p> <p>LTP4 and the accompanying Rail Investment Strategy set out the justification for investment in the rail station at Blakedown.</p> <p>As outlined in the paper “Transport Demand in Hagley” traffic is currently passing through Hagley to access jobs in Black Country and Birmingham, attracted by the car parking and train options at Stourbridge Junction in particular. Investment in Blakedown station provides the facility to capture some of this demand</p>

	<p>congestion in Hagley. It could be argued that improving the A450 corridor without complementary improvements on the Hagley area just allows the congestion to get to Hagley quicker. It is of interest to BDC to understand the amount of congestion that improvements at Blakedown will relieve in Hagley, and also the process which has been undertaken to identify this reduction.</p>	<p>prior to Hagley, thereby reducing congestion.</p>
<p>BDC (2019 response)</p>	<p><u>Duty to Co-operate</u></p> <p>11. The above paragraphs largely reiterate the concerns that BDC has over the robustness of evidence base to support the plan. BDC considers it has engaged fully in the attempts to ensure that the DTC has been met. As highlighted above these evidence related issues are longstanding concerns that BDC has expressed many times. It had been hoped that early engagement initiated by BDC in May 2018, where concerns were expressed about the evidence base that was being worked on to support the previous publication version on the WFLP, would have ensured that no objection needed to be submitted at that time; unfortunately that was not the case, and the Councils previous objection was submitted.</p>	<p>It is disappointing that BDC continues to object to the WFDC Local Plan. WFDC and WCC have held numerous DtC meetings with BDC to try to resolve the issues with them and further technical transport work has been produced as a result.</p>
<p>BDC (2019 response)</p>	<p>12. As referred to above in an attempt to ensure constructive engagement, meetings took place in February and March 2019, where a set of actions were agreed by all parties which it hoped would result in a robust evidence base which addresses the concerns of BDC. The work which was prepared as a result of these discussions was only seen by BDC in June 2019.</p>	<p>Numerous joint DtC meetings have been held with BDC to discuss the WF Local Plan and the transport implications (part 4 of this SofCG lists the dates of the DtC meetings held). The minutes of the DtC meeting held on 13<sup>th</sup> March 2019 state clearly in the second action that WCC would prepare the transport evidence by <b>June 2019</b>. The final minutes of the meeting were agreed by all. Duty to co-operate is not one sided – there is a duty to co-operate by all parties.</p>
<p>BDC (2019 response)</p>	<p>13. In June 2019 WFDC published the local plan documents as part of its Overview and Scrutiny agenda for the meeting of 4<sup>th</sup> July 2019. On initial review of these documents BDC again expressed concerns that this evidence</p>	<p>During the DtC meeting held on 30<sup>th</sup> July, a next meeting date was <b>suggested</b> (<i>pencilled in</i>) for 29<sup>th</sup> August 2019, however when the WFDC officer checked their calendar following the meeting, it was realised that the <b>suggested</b> meeting date</p>

	<p>still does not address the longstanding issue of clarity of the developments impacts. It was agreed that a DTC meeting needed to take place. This meeting took place on the 30<sup>th</sup> July 2019, at this meeting a set of actions were agreed which would provide BDC the information it sought, in particular the impacts of development on the Hagley area. It was agreed that this information should be provided for the 29<sup>th</sup> August 2019, prior to the representation period on the publication version of the plan opening. A meeting was pencilled in to discuss this additional work on the 29<sup>th</sup> August 2019. Subsequent to this meeting it is understood that WFDC contacted WCC separately to request that the work is not provided for the 29<sup>th</sup> August as agreed, minutes of that meeting confirm this;</p> <p><i>Following on from this meeting WFDC reviewed the proposed meeting date for discussion of Hagley paper and next steps (29<sup>th</sup> August). They concluded that as there was not time for them to review all the information in advance of the regulation 19 consultation, they would rather the meeting was postponed until late September to allow more time for the paper to be prepared and reviewed and the consultation to commence.</i></p>	<p>would not be possible. Also, as the lead officer from WFDC was going to be away on annual leave for over two weeks before this <b>suggested</b> meeting date, it was felt that there was not sufficient time available for any further technical documents to be checked thoroughly before being published for the pre-submission consultation start date of 2<sup>nd</sup> September 2019. WFDC therefore does not think it was in anyway unreasonable to delay the meeting date and to allow more time for WCC to produce the additional technical work that was being requested by BDC. Also, as BDC had not put in writing what their latest concerns were with the WFDC transport evidence, it was considered prudent to request BDC to put their concerns formally in writing by responding to the consultation (see Appendix 5). As this additional technical work, which became known as ‘the Hagley Paper’, was being prepared as a background Paper to this SofCG, it was not considered necessary for it to be consulted on during the regulation 19 consultation. The documents for consultation had already been agreed by WFDC Members at a Cabinet meeting held on 16<sup>th</sup> July 2019 and therefore the Hagley Paper would have been a new document not agreed by WFDC Members. It is for WFDC to decide what it publishes and what it does not publish for its regulation 19 consultation; it is not a decision to be made by BDC. The Hagley Paper was not a document commissioned by WFDC but rather a document that was produced by WCC in response to the BDC objections to the WFDC Local Plan. The Hagley Paper therefore is a background paper to this SofCG and can be viewed in Appendix 6.</p> <p>The quote in para 13 of the BDC response has been taken from a ‘draft’ of the meeting minutes which had not been written or agreed by WFDC. It was therefore unhelpful of BDC to include this ‘draft’ paragraph in their response to the WF Local Plan and subsequently publish it into the public domain. In WFDC’s view, this approach taken by BDC is not in the</p>
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		spirit of 'duty to co-operate'.
BDC (2019 response)	<p>14. On receiving notification on the minute above BDC requested a further amendment was made to the minutes as below:</p> <p><i>BDC must point out on the record that the reason for the timescale was to allow for all the documents to be available for the start of the representations period. We have reservations about this revised timescale for the publication of the work and the possible implication that BDC and other stakeholders will not have full access to the evidence for the full duration of the regulation 19 representation period.</i></p>	The 'Transport Demand in the Hagley Area' is a background paper to this Statement of Common Ground. It was produced and published by WCC in response to the BDC objection to the WF Local Plan and following the numerous joint DtC meetings WFDC and WCC have held with BDC.
BDC (2019 response)	15. At the time of writing this representation the information which was agreed on the meeting of the 29 <sup>th</sup> July has still not been provided, and therefore this objection has been drafted.	Objection noted. This in itself shows that the Hagley Paper could not have been produced in the timescales demanded by BDC. As further transport modelling work needed to be undertaken by WCC, the first draft of the paper was only made available to WFDC in late December 2019 with the final version being published by WCC on 13 <sup>th</sup> February 2020. A draft of the paper was made available to BDC on 6 <sup>th</sup> January 2020, before the DtC meeting being held on 7 <sup>th</sup> January at which WCC presented the main findings of the paper to BDC. BDC were given the opportunity to comment on the draft paper before WCC published the final version on their website on 13 <sup>th</sup> February 2020. BDC commented both at the DtC meeting and in a subsequent email and phone call with WCC on 8 <sup>th</sup> January 2020. BDC did not share the email or phone call conversation with WFDC.
BDC (2019 response)	<p><u>Concluding comments:</u></p> <p>16. BDC continues to raise concerns about the lack of a robust evidence base and, also unfortunately raises potential concerns about the ability of WFDC to meet the DTC. It is hoped that working within the relevant regulations which dictate the plan making process from this point forward, and by continuing to engage with Wyre Forest District Council and Worcestershire County Council, that</p>	It is important to note that WFDC and WCC are in agreement and have cooperated effectively with each other during these joint DtC meetings. WCC is the highway authority and is content with the WF Local Plan and the transport evidence base (which they prepared). WCC and WFDC do not consider that the Local Plan will compromise highway safety in Bromsgrove District or have severe impacts on the transport network. No specific mitigation is therefore required in Bromsgrove District

	<p>a solution to the issues above can be found in advance of the submission of the Wyre Forest Local Plan. The outcomes of this ongoing engagement can then be reported in the Statement of Common ground which we understand will accompany the submission.</p>	<p>as a result of the WF Local Plan. Efforts have been made by both WFDC and WCC to reach agreement with BDC through the DtC process.</p> <p>At a Full Council meeting on 20<sup>th</sup> February 2020 WFDC Members agreed to submit the Local Plan (2016-2036) to the Secretary of State for the purposes of examination, including all the supporting evidence base documents. This shows that WFDC Members have agreed an appropriate strategy for Wyre Forest District for the Local Plan review and consider the plan to be ‘sound’ for the purposes of examination.</p> <p>It is unfortunate that BDC are still objecting to the Local Plan. However, it is not for BDC to decide what an appropriate strategy should be for WFDC.</p> <p>With regard to Hagley, WCC acknowledge that works undertaken to mitigate recent development in the village have not had the desired impact of easing traffic flows and are part of the ongoing works which are being developed and implemented to address this issue.</p> <p>The evidence provided by WCC (the highways authority for both districts) shows that the impact from the WF Local Plan on Hagley will be minimal.</p> <p>WFDC therefore conclude that there is neither a soundness issue nor a duty to co-operate failing on their part.</p>
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## 7) Other Strategic Matters discussed at Duty to Cooperate meetings

As WFDC is a green belt local authority, the question of whether neighbouring local authorities can help to meet the housing need for Wyre Forest in the emerging and future local plans needs to be considered. Bromsgrove District Council is currently reviewing its District Plan which includes a Green Belt review. BDC forms part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Policy BDP4 in the adopted Bromsgrove Local Plan states that a Local Plan review, including a full Green Belt review, will be undertaken before 2023 and will *“identify land to help deliver the objectively assessed housing requirements of the West Midlands conurbation”*.

The emerging WFDC Local Plan is intending to accommodate all of its housing need within its own district area; however this will involve some green belt release which will need to be considered at examination stage by the Planning Inspector.

## **8) Governance Arrangements**

The governance arrangements are key to the effectiveness and implementation of the Statement of Common Ground. The table below sets out the requirements for the authorities involved.

<b>Local Authority</b>	<b>Method of Approval</b>
Wyre Forest District Council	SofCG to be signed off by Corporate Director for Economic Prosperity and Place
Worcestershire County Council	SofCG to be signed off Strategic Director for Economy and Infrastructure
Bromsgrove District Council	SofCG to be agreed by BDC Council Leader following consideration by the full Council

## **9) Timetable for agreement**

The table below sets out the timetable arrangement for the Statement of Common Ground to be agreed.

<b>Local Authority</b>	<b>Timetable for approval</b>
Wyre Forest District Council	SofCG to be signed off by Corporate Director for Economic Prosperity and Place
Worcestershire County Council	SofCG to be signed off by Strategic Director for Economy and Infrastructure
Bromsgrove District Council	17 <sup>th</sup> June 2020 Council Meeting

## **10) Areas of Agreement**

The parties agree that:

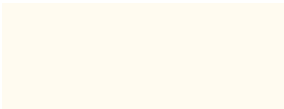

- i) WFDC has fulfilled its Duty to Cooperate with BDC.
- ii) WFDC has fulfilled its Duty to Cooperate with WCC.
- iii) WFDC is satisfied that all matters raised in the BDC representation to the WFDC Local Plan Review (2016-2036) have been considered and addressed.
- iv) WCC is satisfied that all matters raised in the BDC representation to the WFDC Local Plan Review (2016-2036) have been considered and addressed.
- v) BDC is satisfied that all matters raised in its representations to the WFDC Local Plan Review (2016-2036) have been considered.
- vi) The parties will continue to work positively together, including with other authorities where relevant on strategic cross boundary issues.

## 11) Conclusions

WFDC and WCC have reached agreement. Officers from WFDC and WCC have met several times with BDC but despite their best efforts, they have not been able to reach a tripartite agreement with Bromsgrove District Council, that all disagreements have been addressed. Therefore, WFDC accepts that a full agreement with BDC is not going to be reached.

## 12) Signatories

This Statement of Common Ground has been agreed and signed by the following:-

<b><u>Worcestershire County Council</u></b>  Name: <u>Nigel Hudson</u>  Position: <u>Head of Strategic Infrastructure and Economy</u>    Date agreed: <u>30 April 2020</u> Signature: _____	<b><u>Wyre Forest District Council</u></b>  Name: <u>Mike Parker</u>  Position: <u>Corporate Director: Economic Prosperity &amp; Place</u>  Date agreed: <u>30<sup>th</sup> April 2020</u> Signature:  _____
<b><u>Bromsgrove District Council</u></b>  Name: _____  Position: _____  Date agreed: _____  Signature: _____	

## **Appendices**

- Appendix 1 – Joint Duty to Cooperate Meeting Minutes between WFDC, WCC and BDC
- Appendix 2 – BDC response to the WFDC Preferred Options consultation (June – Aug 2017)
- Appendix 3 – BDC response to the WFDC Pre-Submission Consultation (Nov / Dec 2018)
- Appendix 4 – BDC response to the WFDC re-opening of the Pre-Submission Consultation (Sept / Oct 2019)
- Appendix 5 – Letters
- Appendix 6 – Background Paper: Transport Demand in the Hagley Area (January 2020)  
[www.worcestershire.gov.uk/LTP](http://www.worcestershire.gov.uk/LTP)



## MONTHLY HIGHWAYS MEETING

30 MAY 2018

BDC/RBC	Ruth Bamford, Mike Dunphy, Kevin Dicks
WCC	Andy Baker, Steve Hawley, Emily Barker, Martin Rowe
NWEDR	Jon Elmer
WFDC	Daniel Atiyah
Highways England	Chris Cox (JMP), Patricia Dray
Mott MacDonald	Oliver Hague, Paresh Shingadia

In Attendance                      Barbara Newman (mins)

Apologies:                          Nigel Hudson, Matt Stanczyszyn, Karen Hanchett

### Introduction and Apologies

Introductions given and apologies noted as above.

#### 1        **Actions from Previous Meeting**

1. Provide WCC recommendation on Whitford Road Scheme – Steve Hawley (SH) advised that decision issued 29 May 2018.
2. Provide draft agenda for Transport workshop – on agenda later to discuss.
3. Co-ordinate workshop – on agenda later to discuss.
4. Provide note on Local Infrastructure Rate – AB advised still outstanding and follow-up after meeting. It is possibly still being looked at from a financial prospective. It was agreed a note would be issued by Wednesday of next week (6<sup>th</sup> June).
5. Provide Overview and Scrutiny Response – Some outstanding matters – on agenda later to discuss
6. Response to Hagley PC – MD to send to AB by next week. MR has provided Hagley PC the data.
7. Invite Wyre Forest to next meeting – Daniel Thailand invited.

#### 2.       **Emerging Wyre Forest Plan evidence base**

Mike Dunphy (MD) stated Bromsgrove have raised concerns regarding development in plans on Western side of district which will affect Bromsgrove. MD asked what the implications were and asked for an understanding of what was being developed between Wyre Forest District Council (WFDC) and Worcestershire County Council (WCC). There was possibly information that could be shared. Kevin Dicks (KD) asked how much impact there would be. MD asked when any details of the implications of the sites would be available. KD asked would there be a different site if it was infrastructure led. Martin Rowe (MR) stated after an economy collapse i.e. carpet industry it can take some time for regeneration. Some of the growth would be transferred to rail because of plans for the station. MD asked where the evidence was that Bromsgrove would not be affected if

the proposed rail plans are facts. It was stated that such options for people working from home would also help. MD again asked for a list of strategies and evidence that these plans will work. KD asked why on the east rather than west. MR stated the railway station was on that side of the town. Paresh Shingadia (PS) requested sight of a strategic document from a transport prospective. MR stated there was capacity on rail to accommodate. Emily Barker (EB) said there was an IDP which had been out to consultation and was now being refined. Steve Hawley (SH) said although information is not all there it was at the stage of being refined. PS stated the issue was that were these the correct locations and shouldn't the transport be looked at first. Local impacts need to be understood. MR stated that economy issues need to be included. MD stated this is why we need to look at transport and then location. Jon Elmer (JE) stated that there was a lot of work to be done but evidence needed to come out into the public domain. Inspector would be asking questions. Members need to be satisfied that there would be no impact. EB said once we had the modelling it would be beneficial to discuss this with Bromsgrove. SH stated options would be going to WFDC. Dan Atiyah (DT) advised that he understood that a report would be going to WFDC members on 12th June. It was agreed to keep this as a standing agenda item and in the meantime any information would be appreciated. Invite to future meetings was extended to whoever wanted to attend WFDC. EB also agreed to speak to WFDC and ask if the IDP could be shared with Bromsgrove.

#### **ACTION 1: EB**

### **3. Transport Assessments – Perryfields and Whitford Road**

Whitford Road – SH Whitford Road is now in by Steve Hawley.

Perryfields Road – This is the next one on the list and likely to be a lot of repetition from Whitford Road. It was stated that Whitford Road would probably submit quite a lot of information. Ruth Bamford (RB) asked Mott McDonald (MMcD) the timescale and Oliver Hague (OH) stated awaiting new work which had been done. Want to see that what comes back from Perryfields does not affect accumulative assessment. Some of junctions may need to be revisited. Again only have WCC comments on Perryfields. Developers still carrying out work requested. MMcD to follow up on revised work taking place and this may highlight impacts on network. RB agreed date of 21 June for WCC comments. RB will manage developers' expectations.

#### **ACTION 2: SH**

### **4. BDC Plan Review Evidence Base / Transport Strategy**

MD asked how we collect evidence for Bromsgrove. AB stated could firstly investigate because of what this exercise might cost. MD said yes that would be useful but what do we already know. Evidence beyond the options stage was required. MR stated rail capacity now being reviewed and this could be briefed. MD suggested MR put all transport information we need and then we can carry forward with a workshop. MMcD was looking for a spreadsheet and then to model level, perhaps using the BARHAM model as a base. SH stated if including things such as extra lane on M5 the BARHAM would not be useful. RB stated it would be useful to have a timetable for the next 12 months. MR and AB stated they could provide outline of the work required. Patsy Dray (PD) suggested looking at Regional Traffic models. PD and Chris Cox (CC) also asked to provide any information they had. CC said a spreadsheet is a quick approach.

PD commented on the roadworks and how route was set for safety reasons and once been analysed may change but at the moment staying as it is. DP to get update/statistics. RB asked for timetable for work to be done and it was agreed before

the next meeting. There would be a monthly update relevant to that timetable. Discussions took place regarding costs and who could support these.

**ACTION 3: AB/MR**

**ACTION 4: PD/CC**

5. **BDC plan review Issues and options**

MD stated by the end of the day there would be a final version for members. MD to send Plan to AB for review and feedback by the end of next week.

**ACTION 5: MD**

**ACTION 6: AB**

6. **Overview and Scrutiny WCC response and Western Distributor**

RB asked if WCC have any comments or feedback from Karen or Ken. RB stated draft minutes were not out yet. Discussions on the MMCD and JMP report. It was stated that there were some matters that County may want to answer. Need to know what happens next. A response to the Motts report but there was no timescale. AB said feedback would be by the end of next week (8<sup>th</sup> June). MD also asked for the O & S response. RB asked if AB will let RB know how to tackle. AB was advised that the next O&S meeting was 18 June.

**ACTION 7: AB**

7. **Future Infrastructure Plan**

EB stated the only activity since last session with WPOG (??) and LEP. Completed session with the LEP Board Members and anything significant that came out of discussion. Worcester City had submitted some additional information for 5 years hence. Currently pulling this together with more structure and would be ready for leaders in July.

8. **HM Treasury – Local Infrastructure Rate**

Nothing to report in Nigel Hudson's absence, but note to be issued on 6<sup>th</sup> June

**ACTION 8: AB/HN**

9. **A38 Major Scheme Bid Update**

AB stated not much of an update. Looking further at designing with certain costs incurred at network and continuing current work. Awaiting information from HIF (Housing Infrastructure Fund). J Elmer waiting update. MD asked with regards to the technical work what date do we get something to look at ie. business case. AB to share all information held

**ACTION 9: AB**

10. **Highways England Update**

PD – V2 Strategic road network consultation and waiting response from DCT but will not be received until June/July. Unlikely to have locations for schemes.

9. **AOB**

- KD stated strategic workshop outstanding but MD raised that waiting on information. To be included in timetable. Also should be a WFDC event. MD offered to discuss with WFDC.

Next meeting: 2 July 2018

Actions from this meeting

Action	Who	Deadline
1. Contact WFDC to ask if IDP work can be shared	EB	ASAP
2. Provide formal comments on Perryfields Application	SH	21 <sup>st</sup> June
3. Provide outline of data held and data required for the Transport evidence base and draft scope of work required for the next 12 months.	AB/MR	22 <sup>nd</sup> June
4. Highways England to provide any data they hold	PD/CC	22 <sup>nd</sup> June
5. Circulate draft issues and options to WCC	MD	Done on the 31 <sup>st</sup> May
6. Respond with any final comments	AB/EB	8 <sup>th</sup> June
7. feedback on the Western Distributor report and the O&S issues	AB	8 <sup>th</sup> June
8. Provide update note on Local Infrastructure rate	AB/NH	6 <sup>th</sup> June
9. Info of A38 business case to be shared to with all	AB	ASAP

# Duty to Cooperate Meeting – WFDC/WCC/BDC

## 6<sup>th</sup> February, 2019

### Attendees:

Mike Dunphy – Bromsgrove DC  
Helen Smith – Wyre Forest DC  
Emily Barker – Worcestershire CC  
Martin Rowe – Worcestershire CC

### Apologies:

Karen Hanchett – Worcestershire CC

### ISSUES, DISCUSSION AND ACTIONS

ISSUE	DISCUSSION	ACTIONS
Duty to Cooperate with Other LPAs (Black Country, South Worcs etc.)	<p>HS asked whether BDC are engaging with Black Country on duty to cooperate, and in particular on transport issues relating to Hagley and Lydiate Ash (M5, Junction 4) this reassurance will be required by WFDC elected members.</p> <p>MD stated that Black Country are further back in the process, but that BDC has commenced engagement through the Black Country DtC meetings. BDC has raised similar infrastructure issues as part of this early engagement WCC are also involved in this process and will continue to engage.</p> <p>EB provided clarity on approach in SWDP area, strongly rail-led growth, pending call for sites (end of March for site confirmation which will be in public domain over the summer).</p>	X
Policy 12 and 13 - Schemes that are in the	Bromsgrove DC does not understand the evidence and	ACTION - WCC to prepare

<p>IDP and evidence that supports them. (Hagley Area, Mustow Green and Torton)</p>	<p>believes there is a lack of evidence.</p> <p>Need to see a robust evidence base to justify investment in infrastructure to mitigate the impacts of proposed growth to remove objection.</p> <p>The emerging STEB will provide a more robust evidence base, and may flag up issues that haven't been dealt with, which must be addressed, but this will not complete until June 2019.</p> <p>Traffic modelling is underway to test the impacts of proposed development growth (WFLP).</p> <p>Lack of sustainable transport infrastructure and services is a key threat to delivering sustainable growth in the Wyre Forest (and other areas of Worcestershire).</p>	<p>a WFLP-specific transport evidence base.</p> <p>ACTION - WCC to explore whether it can fund model runs for both a 'with' and 'without' Blakedown Station, aligned with impacts on WFLP growth.</p> <p>ACTION - WCC/WFDC to meet to discuss development of Blakedown Station initially and potential follow up with developer (tbc following discussion)</p> <p>ACTION – WCC to provide BDC/WFDC with WFLP traffic modelling scoping paper</p> <p>ACTION – WCC to provide 'fit-for-purpose statement' on Wyre Forest Transport Model to BDC and WFDC. This will be provided as part of the official response (May 2019)</p> <p>ACTION – WCC to clarify WFLP modelling and evidence base timescales, expected costs and liaison protocol between WFDC, WCC and Jacobs by 14<sup>th</sup> February.</p> <p>ACTION – WCC to ensure modelling reports MUST be fully quality assured and written in a way that it is easy to understand and interpret by Officers, Councillors and the Public.</p> <p>INFORMATION – WCC will undertake validity check (model runs) to test the benefits of proposed</p>
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		<p>mitigation measures set out in the IDP.</p> <p>ACTION - WCC to clarify how mitigation measures specified in the IDP will be costed.</p>
<p>The need to provide reassurance of agreement to members (WFDC, WCC, BDC) to maintain plan development programme.</p>		<p>At Reg. 19 consultation, DtC / Statement of Common Ground approach should be signed off by senior politicians / or approved at Cabinet. Given lead in times this may be difficult, so will need to agree a formal process which outlines that this will happen and provides the necessary narrative for signing off subsequently to tackle concerns and fit with proposed LDP preparation timescales.</p> <p>WFDC agreed to share sites etc. on a confidential basis with officers only from BDC/WCC.</p>

#### Next meeting:

13<sup>th</sup> March 2019 at 13:00  
Worcester Room  
County Hall, Worcester, WR5 2NP

# Duty to Cooperate Meeting – WFDC/WCC/BDC

## 13<sup>th</sup> March, 2019

### Attendees:

Helen Smith, Spatial Planning Manager – Wyre Forest DC  
 Kate Bailey, Head of Strategic Growth – Wyre Forest DC  
 Mike Dunphy, Strategic Planning and Conservation Manager – Bromsgrove DC  
 Karen Hanchett, Devt. Mgmt. and Transport Planning – Worcestershire CC  
 Martin Rowe, Transport Strategy – Worcestershire CC

### Apologies:

Emily Barker, Planning Services Manager – Worcestershire CC

### ISSUES, DISCUSSION AND ACTIONS

ISSUE	DISCUSSION	ACTIONS
<b>Duty to Cooperate with Other LPAs (Black Country, South Worcs etc.)</b>	Clarification that both Bromsgrove DC and Wyre Forest DC are engaging actively with neighbouring LPAs, and specifically the Black Country LPAs.	Engagement with neighbouring LPAs to continue, and in particular with Black Country LPAs regarding transport issues around M5, Junction 4.
<b>Transport Evidence, including traffic modelling</b>	WCC confirmed that modelling of WFDC proposed growth includes a 'with' and 'without' enhanced Blakedown Station scenario, and A450 and A456 strategic transport corridors.	<p>ACTION - WCC to prepare a WFLP-specific strategic transport evidence base. (June 2019)</p> <p>ACTION – WCC to provide 'fit-for-purpose statement' on Wyre Forest Transport Model to BDC and WFDC. This will be provided as part of the official response (May 2019)</p> <p>ACTION - WCC to clarify how mitigation measures specified in the IDP will be costed.</p>



<p><b>The need to provide reassurance of agreement to members (WFDC, WCC, BDC) to maintain plan development programme.</b></p>	<p>DtC / Statement of Common Ground approach should be signed off by senior politicians / or approved at Cabinet. Given lead in times this may be difficult, so will need to agree a formal process which outlines that this will happen and provides the necessary narrative for signing off subsequently to tackle concerns and fit with proposed LDP preparation timescales.</p> <p>Bromsgrove DC's current objection to WF Local Plan proposals is focussed on transport grounds aligned with site allocations. It is WFDC's aim to allocate all housing growth within the District, but if transport evidence should prove that this policy is unsustainable and Bromsgrove maintain their objection, WFDC will need to explore alternative locations to accommodate planned growth. In light of this, WFDC asked if Bromsgrove DC would be willing to take some of their housing growth need, for current and/or future WF Local Plan Reviews, given that Wyre Forest, like Bromsgrove is largely designated as Green Belt.</p>	<p><b>ACTION</b> - Statement of Common Ground to be prepared by WFDC, Bromsgrove DC and Worcestershire CC, to include response over willingness (or otherwise) to share growth.</p>

**Next meeting:**

Mid-June 2019 – Date to be confirmed via e-mail and circulated.

## **WFDC / BDC. WCC Duty to Co-operate Meeting 30<sup>th</sup> July 2019**

### **Present:**

Helen Smith  
Karen Hanchett  
Martin Rowe  
Mike Dunphy  
Emily Barker

### **Progress of WFDC Local Plan**

Plan approved by Cabinet on 16<sup>th</sup> July 2019 for pre-submission consultation 2<sup>nd</sup> September- 14<sup>th</sup> October 2019.  
Expecting to submit to the Inspectorate in March 2020.

Plan now includes the allocation of land at Blakedown Station for mixed use; car parking and housing development.

Unless additional evidence is provided, based on the current evidence BDC is expecting to maintain its position that the WFDC local plan is unsound, primarily on transport grounds because of the potential impact on Hagley which is in BDC area. WCC are not currently proposing a further scheme at Hagley beyond that proposed in LTP4, as given the likely impact of plan revisions in both BDC and Black Country core strategy, would prefer to wait until there is more certainty before proposing any scheme which could offset wider issues given the strategic location of Hagley and potential impacts beyond Hagley and onto the M5 junctions 4 and 3.

WCC preference to address this through Statement of Common Ground / Duty to Cooperate.

BDC raised a potential additional policy requirement in the WFDC local plan which restricts either the quantum of growth or the sites which could come forward in advance of any further scheme at Hagley. WFDC do not support this. WCC do not believe that transport modelling evidence could be used to evidence a cut off figure or set of sites.

### **Transport evidence base**

Discussion on the following aspects of the transport evidence base:

Modelling evidence base	Discussion	Action
Base line of modelling	Not evident in paper	Agreed to revise document to show the baseline
Hagley	Impact of WFDC development, points of discussion:	
	1. VISSIM model for Hagley junctions currently testing	

	NEST 6 proposals from LTP4 to address growth in adopted plans, In progress to complete by the end of August	
	2. Containment of WFDC growth within the district	
	3. Transit through WFDC from rural west / Shropshire towards M5 and conurbation	
	4. Role of expansion of Blakedown station car parking	
	Combine all the Hagley evidence (1-4 above) and information into a single paper to be shared	
	Discussion and next steps for Hagley including scheme design	Not fully resolved; to be discussed further at next meeting following completion of the paper
A450 proposals	No further work identified	
Blakedown station	No further work identified	

### **Date of next meeting**

Date to be confirmed

Time to be confirmed

Venue to be confirmed

It was agreed at the meeting that a Statement of Common Ground would be prepared jointly between WFDC, WCC and BDC before the examination of the WFDC Local Plan commences

### **Discussion subsequent to the meeting**

#### **WFDC**

Following the meeting, WFDC reviewed the proposed meeting date for discussion of Hagley paper and next steps (29<sup>th</sup> August). They concluded that as there was not time for them to review all the information in advance of the regulation 19 consultation, (commencing 2<sup>nd</sup> September 2019) they would rather the meeting was postponed to allow more time for the Hagley paper to be prepared and for WFDC to review. .

#### **BDC**

BDC must point out on the record that the reason for the timescale was to allow for all the documents to be available for the start of the representations period. We have reservations about this revised timescale for the publication of the work and the possible implication that BDC and other stakeholders will not have full access to the evidence for the full duration of the regulation 19 representation period.

## **Duty to Co-operate Meeting Minutes**

**Date of Meeting:** 1<sup>st</sup> October 2019

**Type:** Telephone Conference call

### **Attendance**

Kate Bailey (KB) - Head of Strategic Growth, Wyre Forest District Council

Helen Smith (HS) - Spatial Planning Manager, Wyre Forest District Council

Martin Rowe (MR)-Transport Strategy Team Leader, Worcestershire County Council

Emily Barker (EB) – Head of Planning and Regulation, Worcestershire County Council

Ruth Bamford (RB) – Head of Planning and Regeneration, Bromsgrove District Council

Mike Dunphy (MD) - Strategic Planning and Conservation Manager, Bromsgrove District Council

## **Record of meeting notes:**

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**From:** Kate Bailey  
**Sent:** 22 October 2019 17:12  
**To:** 'Michael Dunphy'  
**Cc:**

**Subject:**

Hi Mike

I am not really sure what your point is. I included the basic description so we could distinguish it from other pieces of work the County may have done but weren't discussed however if you want it removed then we can just keep a record of this strikethrough and email chain.

I haven't asked Jo Lange to arrange a date yet.

Thanks

Kate

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Hi Kate / Helen

Are you able to confirm if you are happy with the amendment we have suggested, and also as yet we've not heard anything about the meeting for November, is this being progressed at your end?

Thanks

Mike

Mike Dunphy  
Strategic Planning and Conservation Manager  
Bromsgrove District and Redditch Borough Councils

Bromsgrove District Council  
Parkside  
Market Street,  
Bromsgrove,  
Worcestershire  
B61 8DA

[www.bromsgrove.gov.uk](http://www.bromsgrove.gov.uk)

Redditch Borough Council  
Town Hall  
Walter Stranz Square  
Redditch  
Worcestershire  
B98 8AH

[www.redditchbc.gov.uk](http://www.redditchbc.gov.uk)

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**From:** Michael Dunphy  
**Sent:** 11 October 2019 10:44

Hi Kate

Slight revision to the comments below, rather than this being considered as the key points of what was discussed, we consider it as being the actions that were agreed, as there was more discussion than has been summarised below, to that end we suggest deleting the strikethrough text as it is only a very partial summary of what the work is, the key point being the WCC will share the work.

- Martin Rowe outlined the piece of work the County Council had undertaken with regards to Hagley which highlighted trip generations from beyond Wyre Forest District. Worcestershire County Council would share this document with us all once available
- RB suggested we would need to extend the WFDC consultation period and KB agreed to seek legal advice regarding this. The Barrister and Solicitor have subsequently concluded the consultation doesn't need to be extended.
- In the circumstances that the document wouldn't be available by close of play on 14<sup>th</sup> RB agreed BDC would have to do a holding response to the consultation and KB / HS felt it would then be reasonable to continue the discussions around this and other issues through the DTC meetings as WFDC were keen to have the statements of common ground in place (where possible) by February
- KB would ask Jo Lange to arrange a DTC meeting for November with BDC / WCC and WFDC

Thanks

Mike

Mike Dunphy  
Strategic Planning and Conservation Manager  
Bromsgrove District and Redditch Borough Councils

Bromsgrove District Council  
Parkside  
Market Street,  
Bromsgrove,  
Worcestershire  
B61 8DA

[www.bromsgrove.gov.uk](http://www.bromsgrove.gov.uk)

Redditch Borough Council  
Town Hall  
Walter Stranz Square  
Redditch  
Worcestershire  
B98 8AH

[www.redditchbc.gov.uk](http://www.redditchbc.gov.uk)

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**From:** Ruth Bamford  
**Sent:** 10 October 2019 21:14  
**To:** Michael Dunphy  
**Subject:** FW: Duty to Co-operate meetings

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**From:** Kate Baile  
**Sent:** 10 Oct 2019 17:31

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Hi Ruth

I agreed during our conversation to write some brief notes and send them to you. Please send them on to Mike for me.

- Martin Rowe outlined the piece of work the County Council had undertaken with regards to Hagley which highlighted trip generations from beyond Wyre Forest District. Worcestershire County Council would share this document with us all once available
- RB suggested we would need to extend the WFDC consultation period and KB agreed to seek legal advice regarding this. The Barrister and Solicitor have subsequently concluded the consultation doesn't need to be extended.
- In the circumstances that the document wouldn't be available by close of play on 14<sup>th</sup> RB agreed BDC would have to do a holding response to the consultation and KB / HS felt it would then be reasonable to continue the discussions around this and other issues through the DTC meetings as WFDC were keen to have the statements of common ground in place (where possible) by February
- KB would ask Jo Lange to arrange a DTC meeting for November with BDC / WCC and WFDC

Please advise me if you don't feel this is a summary of the key points discussed in the meeting.

Thanks

Kate

**Kate Bailey**  
Head of Strategic Growth

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## DUTY TO CO-OPERATE MEETING

14 November 2019

BDC/RBC	Ruth Bamford, Mike Dunphy, Gemma Hawkesford, Kevin Dicks (for last few minutes)
WCC	Karen Hanchett, Emily Barker, Martin Rowe
WFDC	Helen Smith
Apologies:	Kate Bailey

### Introduction and Apologies

#### 1. **BDC's reg 19 Representations**

Ruth Bamford (RB) opened the meeting and explained due to weather conditions the meeting would be condensed to 30 mins but with the view to reconvening at a future date. Two variations of the agenda had been submitted and the BDC agenda would be used for this meeting.

Mike Dunphy (MD) – MD advised that as WFDC do not respond as such to the representations made BDC are seeking clarity or whether there are issues that are fundamentally disagreed upon in the 2 different representations made.

Helen Smith (HS) – HS advised that this would be dealt with as part of the process of Statement of Common Ground and until the Hagley paper had been seen it was difficult to say.

Emily Barker (EB) – Clear as to what BDC were asking and believed it had been picked up in paper from both representations. EB offered to send an email outlining what was outstanding.

**ACTION: EB**

**to send email**

#### 2. **WFDC's Submission Timetable**

Ruth Bamford (RB) asked HS about the timetable. HS advised timetable was not changing. It was also asked if it would be WCC submitting the additional work to the Inspectorate. EB advised that WCC would submit any additional transport information to Wyre Forest District Council (WFDC) and it was then WFDC to decide on the next steps. HS advised that permission would be sought from members only if it believes the work is relevant to the WFDC local plan. MD stated that it had to be used one way or another by BDC and therefore would be part of the examination. HS stated this could not be confirmed until papers read from a WFDC perspective. MD reiterated that the work would need to be submitted as would be referenced in the Statement of Common Ground.

The Inspectorate is aware of the timetable and submission from WFDC in which will be March/April next year.

#### 3. **Additional Transport Work**



MD queried the role of Jacobs and work that there were undertaking. Clarified that they are completing further modelling of Hagley to support the study below. .

Martin Rowe (MR) – MR gave a presentation on the study in two parts on the A456 corridor. The first part used census data and the second provided more detailed modelling on the A456. Analysis used actual data from the 2011 Census. The actual count of A456 was 31,852 vehicles. Within the report the data had been provided in tables to enable analysis of travel patterns from relevant districts. . Including Bromsgrove and Wyre Forest.

As part of the study, a series of discussions have been undertaken with other neighbouring authorities including South Staffs and Black Country/ Dudley. It was advised that Dudley MBC were not looking at any highway improvement schemes but concentrating on public services i.e. bus service and metro. (A456 is a major route with a combination of local and national trips. Interventions may need to reflect this). MD asked if what was non-national could be identified to establish impact of WFDC's plan, and the response was yes and will be in the next phase of the report which would be issued as soon as possible. Karen Hanchett (KH) stated that this may well be into December.

RB asked HS when the plan would formally be submitted to Members and HS advised January/February when the Local Plan Review Panel with Members would be held together with O&S, Cabinet and Full Council. It was agreed that MR was to produce a report by end-December but that the modelling may not be complete for then. Important meetings at WFDC are scheduled in February. MD asked if analysis of Hagley included any current Jacobs modelling and answer was no. MD stated that if there was any previous work on other routes mention in BDC representations i.e. A441 BDC would need to see these as well. MR agreed to look at data for this with particular attention to percentage of new trips.

RB stated that Hagley Parish Council would like to know if documentation would be put into the public arena and HS advised that the document would need to be released as part of O&S/Full Council normal process. HS felt it was highly unlikely that Members would want Hagley Parish Council to see this work in advance of their considerations.

MD suggested a phone call next week to discuss through remaining items on agenda i.e. Statement of Common Ground. Two meetings were required because items to Cabinet and Council. RB stressed the importance of understanding everyone's timetables and presentation to Cabinet etc for signature. . EB suggested discussing with Legal Counsel regarding preparation of statements of common ground and how advanced these need to be before submission to the Planning Inspectorate, MD stated that statements of common ground should be ready for start of examination ie: submission to the Inspectorate and it has to have full political endorsement. HS said would have ability to update. Email to be sent to HS regarding full Council dates on BDC calendar to enable adhering to acceptable timescales and understanding the process.

**ACTION: MD to  
provide committee timetable for Bromsgrove.**

EB asked if it was worth doing an interim Statement of Common Ground. MD/RB agreed it may help and what we can agree to progress this.

Kevin Dicks entered the room in order to attend the following meeting on transport matters

Timetable for duty to co-operate meetings was briefly discussed and it was suggested that monthly meetings to be held until submission.

MD to email outline of the required discussions on the outstanding items 5, 6 and conclusion of 7 on the agenda.

**ACTION: MD to send email outlining discussions**

## WFDC Duty to Cooperate Meeting 7<sup>th</sup> January 2020

Wyre Forest House, Rock Room 11 am

### Attendance

Kate Bailey (KB) - Head of Strategic Growth, Wyre Forest District Council

Helen Smith (HS) - Spatial Planning Manager, Wyre Forest District Council

Daniel Atiyah (DA) - Planning Policy Officer, Wyre Forest District Council

Martin Rowe (MR)-Transport Strategy Team Leader, Worcestershire County Council

Emily Barker (EB) – Head of Planning and Regulation, Worcestershire County Council

Karen Hanchett (KH) – Transport Planning & Development Management Team Leader,  
Worcestershire County Council

Ruth Bamford (RB) – Head of Planning and Regeneration, Bromsgrove District Council

Mike Dunphy (MD) - Strategic Planning and Conservation Manager, Bromsgrove District Council

### Agenda

- 1) Introductions
- 2) Local Plan review progress and timetables (all)
- 3) Update on Hagley Paper (WCC)
- 4) Questions on Hagley Paper (all)
- 5) Statements of Common Ground
- 6) Ongoing engagement with Duty to Cooperate partners
- 7) AOB

The meeting opened with introductions. MD updated the group on the Bromsgrove Local Plan Review. Bromsgrove District Council (BDC) is currently looking at approx 300 sites and at present no updated Local Development Scheme (LDS) in place for the plan review. The timeframe is dependent on the strategic transport assessment. HS updated the group on the Wyre Forest District Council (WFDC) Local Plan. The plan timeframe is on track and is due to be submitted for examination in March 2020, following Members meeting in February 2020.

The draft Hagley Paper that has been produced by WCC was then discussed. MR reviewed the main sections of the paper. Bromsgrove district has strong transport links to Birmingham. Redditch was constructed as a new town and so is less dependent on Birmingham. Wyre Forest District is a more self contained area for transportation. The district experiences traffic travelling through the district

from locations outside the district to the west; this traffic is travelling to Birmingham for employment. The use of the car is due to poor train services to the west of the district. West Midlands Railways are to introduce car parking charges at railway stations in the Black Country due to the air quality pollution issues. They are also in support of Blakedown and Kidderminster station improvements. MR discussed that traffic modelling of the proposed Lea Castle development suggests that most of the site's trip generation is focussed either southwards towards the Wyre Forest Towns, or northwards towards Stourbridge and the wider West Midlands Conurbation.

Highways colleagues at County mentioned that an additional paper has been produced by Jacobs in regards to traffic at Hagley. Some of the information from the additional paper would be included within the WCC Hagley Paper. WFDC said that they had not been made aware of this additional paper until today. KH said that an advanced draft of the additional paper can be sent out next week for comments. WFDC suggested that the necessary information from the additional paper should be added into the Hagley Paper.

MD queried that the table on page 2 of the Hagley Paper in that the axis is incorrect and should be displayed the other way around. This would affect the traffic data by location. MR will review this. MD commented that the proposals at Hagley have changed in the past two years from a bypass to no road improvements. MD queried whether there is evidence to show which roads within north Worcestershire need enhancement or not.

MR will look at the table again. MR also commented that the 2011 census data does not use leisure transport data which may affect the transport data. MD asked if further information be added to the WFDC Infrastructure Delivery Plan in regards to Hagley. HS stated that the IDP is a live document and therefore can be updated if necessary.

The Statement of Common Ground (SofCG) was discussed. This is to be completed by the time WFDC submit the Local Plan to the Planning Inspectorate in March 2020. It will be prepared jointly between WFDC, WCC and BDC.

The timetable of the plan and SofCG was discussed. WFDC could receive an officer agreed SOCG from BDC for the March submission but it would not be signed off by BDC Members until April 2020, due to the lead-in times for Members meetings at BDC.

MD queried the Duty to Cooperate process and believes that some issues have not been addressed, namely transport. HS commented that WFDC has carried out the Duty to Cooperate process with BDC by holding numerous joint DtC meetings with them and WCC. WCC has also produced the Hagley Paper to add to the SofCG as a background paper, in an attempt to address BDC's transport concerns. KB stated that areas that haven't been agreed as well as those that have will be recorded within the SofCG that will be available to the public and the Inspector.

RB then questioned if the Hagley Paper will be made public. HS stated that the Hagley Paper would become available to the public through the WFDC Members meetings, the first one being Overview & Scrutiny on 6<sup>th</sup> February 2020.

MR hopes to update the Hagley Paper by the 17<sup>th</sup> January and will send out for comments. The discussion then went to finding available dates for the next meeting, which will require further review to find a suitable date. The meeting was then concluded.

## WFDC Duty to Cooperate Meeting with WCC and BDC - 19<sup>th</sup> March 2020

Wyre Forest House, 2pm – Telephone conference call

### Attendance:

Kate Bailey (KB) - Head of Strategic Growth, Wyre Forest District Council

Helen Smith (HS) - Spatial Planning Manager, Wyre Forest District Council

Daniel Atiyah (DA) - Planning Policy Officer, Wyre Forest District Council

Martin Rowe (MR)-Transport Strategy Team Leader, Worcestershire County Council

Emily Barker (EB) – Head of Planning and Regulation, Worcestershire County Council

Ruth Bamford (RB) – Head of Planning and Regeneration, Bromsgrove District Council

Mike Dunphy (MD) - Strategic Planning and Conservation Manager, Bromsgrove District Council

### Apologies:

Karen Hanchett (KH) – Transport Planning & Development Management Team Leader, Worcestershire County Council- Apologies sent

## **Agenda**

- 1) Introductions
- 2) Local Plan review progress and timetables
- 3) Hagley Paper [www.worcestershire.gov.uk/LTP](http://www.worcestershire.gov.uk/LTP)
- 4) Draft Statement of Common Ground (see attached)
- 5) Ongoing engagement with Duty to Cooperate partners

## **Meeting Minutes**

- 1) This meeting was conducted via a conference call with WFDC, WCC and BDC officers due to the COVID-19 outbreak. The meeting opened with introductions. KH sent her apologies.
- 2) HS updated the group on the WFDC local plan timetable. The plan went through full council on 20<sup>th</sup> February 2020. The plan is to be submitted in April to the Planning Inspectorate for examination. RB and MD updated the group on the BDC local plan progress. BDC are currently reviewing the call for site responses. No further update could be provided on when the BDC Preferred Options consultation would take place. When BDC know the timetable arrangements for their transport evidence they will then publish the LDS timetable for the BDC Local Plan

Review. EB told the group that the county side transport modelling will be in an 18 to 24 month timeframe from procurement.

- 3) The Hagley Paper was then discussed. MD thinks there are still some fundamental issues with the way the Hagley Paper has been presented but did not articulate what these issues are. BDC have asked Mott McDonald to review the Hagley Paper. MD stated that the Mott's review should be addressed to WFDC rather than WCC as WFDC had commissioned the Hagley Paper. KB corrected MD on this point as the Hagley Paper had not been commissioned by WFDC; it is a technical paper produced by WCC for the purposes of the joint DtC discussions that have been taking place and the Hagley Paper is a background paper to the joint Statement of Common Ground. It was concluded that the Mott McDonald review will be sent to both WCC and WFDC. EB said that WCC would need to consider the Mott's review and if necessary prepare a rebuttal report, but legal advice would be sought first with WFDC as to whether this should be for the examination or outside of that process.
- 4) The draft joint Statement of Common Ground was then discussed which had been circulated to the group in advance of the meeting on 13<sup>th</sup> March 2020 for comments. MD did not provide any comments on the draft SofCG but stated that BDC would be unwilling to sign a joint SofCG with both WFDC and WCC, but did not articulate why. HS and KB were surprised at this comment from MD, as WFDC had undertaken numerous joint DtC meetings with both WCC and BDC and the joint Statement of Common Ground approach had been agreed at these DtC meetings and recorded in the DtC meeting minutes. HS reminded MD that BDC also has a duty to cooperate with WFDC and WCC and the duty to cooperate is not one sided. MD said he was aware of this. EB stated that WCC are satisfied to be included as a tripartite DtC joint Statement of Common Ground. KB asked when MD would be able to provide comments on the draft joint SofCG. MD said that comments could be provided by end of next week. KB therefore requested that comments be returned by 27<sup>th</sup> March 2020 - this was agreed by all at meeting. HS stated that once comments have been received back from BDC, the joint SofCG would be finalised for signing by BDC and WCC. It was agreed by the group that a telephone conference call should take place between the dates of 1<sup>st</sup> to 3<sup>rd</sup> April 2020 to discuss comments on the draft joint SofCG. HS stated that the joint SofCG will be submitted with the local plan in April 2020 and would therefore need to be finalised by officers in advance of submission. WFDC would appreciate cooperation by all parties to achieve this deadline.
- 5) As WFDC will be submitting the local plan to the Planning Inspectorate in April 2020, the duty to cooperate meetings would come to a close as the examination commences.

## WFDC Duty to Cooperate Meeting with WCC and BDC – 2<sup>nd</sup> April 2020

Wyre Forest House, 1pm – Telephone conference call

### Attendance:

Kate Bailey (KB) - Head of Strategic Growth, Wyre Forest District Council

Helen Smith (HS) - Spatial Planning Manager, Wyre Forest District Council

Daniel Atiyah (DA) - Planning Policy Officer, Wyre Forest District Council

Martin Rowe (MR) -Transport Strategy Team Leader, Worcestershire County Council

Emily Barker (EB) - Head of Planning and Regulation, Worcestershire County Council

Karen Hanchett (KH) - Transport Planning & Development Management Team Leader,  
Worcestershire County Council

Ruth Bamford (RB) - Head of Planning and Regeneration, Bromsgrove District Council

Mike Dunphy (MD) - Strategic Planning and Conservation Manager, Bromsgrove District Council

1) This meeting was held via teleconference due to the ongoing COVID-19 outbreak. The meeting started with introductions and there were no apologies.

2) HS invited MD to offer BDC comments on the draft Statement of Common Ground. MD commented on the term “numerous” DtC meetings being held between BDC and WFDC in the draft SofCG, and suggested this should be changed to ten. HS commented that more than ten meetings had been undertaken with BDC and the term “numerous” encompassed all of these meetings. MD also recalled a meeting being held with the previous Planning Policy Manager at WFDC to discuss transport issues. KH believed this to be correct and said she was also present at this meeting. However, specific date and meeting minutes at present cannot be located. Action 1: KH to find date of meeting and check if meeting minutes are available. Action 2: HS to add this additional meeting to the SofCG.

3) Section 5 of the SofCG-Strategic Matters Identified, was then discussed. On 27<sup>th</sup> March 2020 (prior to this DtC meeting), BDC sent WFDC and WCC a technical note prepared by Mott McDonald (MM) in response to the IDP and transport evidence (dated June 2019) prepared for the Wyre Forest Local Plan and the Hagley Paper (Jan 2020) prepared by WCC. BDC requested that this technical note should be included as an appendix to the SofCG. KB said that unfortunately WFDC would not be willing to include this as an appendix to the SofCG as it was not appropriate at this late stage; WFDC are about to submit their Local Plan and this information should therefore have been shared earlier in the process. KB also pointed out that the Hagley Paper had been prepared by WCC as a background paper to this SofCG and had already been finalised and published by WCC. HS pointed out that the technical note states: *“The WCC report ‘Transport Demand in the Hagley Area’ was not available during the first review and therefore has now been considered with some preliminary findings from MM set out in Section 3.”* HS asked when the first review was undertaken by Mott McDonald and why it had not been shared with WFDC and WCC sooner than now. BDC confirmed

that the first review technical note was used to inform the BDC Reg 19 representation submitted to WFDC in 2019. HS asked why they had not attached the first review technical note to their Reg 19 consultation response as surely this would have helped WFDC and WCC to better understand BDC's concerns. In light of the joint DtC meetings that the group had been undertaking this did not make any sense as it could have helped with the joint DtC discussions. BDC reiterated the position that the MM work was used to inform BDC's representation. It was agreed by all that the reference to the technical note should be removed from the SofCG and that BDC should instead use the technical note as part of their hearing statement for the examination.

4) MD asked for additional text to be added to the potential modification for Policy 12 in the SofCG (shown in red text as follows): **"Where appropriate, planning obligations will be required to fund infrastructure projects, including those outside the district, that are directly related to specific development, including but not limited to affordable housing, transport, green infrastructure, education, health and other social infrastructure."** KB said that this would not be appropriate as why would WFDC want to fund works outside the district when the WCC evidence is that our in-district development will not need to rely on out-of-district infrastructure? MD said the different positions between WFDC, WCC and BDC in regards to the transport evidence will be discussed at the local plan examination stage. HS pointed out that planning obligations would be undertaken in accordance with the statutory text.

5) MD queried a comment on page 14 of the draft SofCG which referred to the Hagley Paper being further refined. EB stated this is an out of date comment now that the Hagley document has been finalised and published on the WCC website. It was agreed to remove this comment on page 14 of the draft SofCG.

6) Further to the previous meeting held on the 19<sup>th</sup> March 2020, MD confirmed that BDC is now satisfied that the SofCG is a tripartite agreement. MD therefore confirmed that BDC is willing to sign the joint SofCG with WFDC and WCC. However, MD said that the SofCG will need to be signed off by the Council Leader following consideration by the full council on 17th June 2020. KB asked where in the BDC constitution it said this, as the WFDC legal advisor had not been able to locate this. MD said that the justification for this is in a Cabinet report of theirs (rather than the constitution), that all SofCG have to be signed off by full council. KB asked MD to send WFDC a copy of the Cabinet report. Action 3: MD to send WFDC a copy of the Cabinet report.

7) Subject to a few minor amendments, Officers agreed the SofCG at the meeting and that the final version would be sent by WFDC to request formal sign off.

8) DA asked for any comments on the minutes for the previous DtC meeting to be sent to him no later than 3<sup>rd</sup> April 2020.

9) No other matters were raised and the meeting was concluded.



## Elaine Wilcox

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**From:** Michael Dunphy  
**Sent:** 15 August 2017 10:28  
**To:** LPR Consultation  
**Subject:** FW: BDC and RBC responses  
**Attachments:** Bromsgrove Response to Wyre Forest Preferred option August 2017.docx; Redditch Response to Wyre Forest Preferred option August 2017.docx

**Categories:** Green Category

Hi Please

See attached email, I would be grateful if someone could respond on behalf of Helen to confirm, our responses will be considered.

Thanks

Mike

Mike Dunphy

Strategic Planning Manager  
Planning and Regeneration  
Bromsgrove District Council  
[www.bromsgrove.gov.uk](http://www.bromsgrove.gov.uk)

Acting Development Plans Manager (Job Share – Mondays and Fridays)  
Planning and Regeneration  
Redditch Borough Council  
[www.redditchbc.gov.uk](http://www.redditchbc.gov.uk)

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**From:** Michael Dunphy  
**Sent:** 15 August 2017 10:03

Hi Helen

Hope you are well and getting to grips with working over at Wyre Forest, please see attached the responses to the Preferred Draft Consultation from both BDC and RBC, I realise the consultation ended last night but I was having trouble accessing my emails yesterday so wasn't able to send them. As this is still the informal stages of consultation I would be grateful if you could confirm you will still take them into account. I would also welcome the opportunity to come over and discuss these with you alongside WCC highways.

I look forward to your response.

Thanks

Mike

Mike Dunphy

Strategic Planning Manager  
Planning and Regeneration  
Bromsgrove District Council  
[www.bromsgrove.gov.uk](http://www.bromsgrove.gov.uk)

Acting Development Plans Manager (Job Share – Mondays and Fridays)  
Planning and Regeneration  
Redditch Borough Council  
[www.redditchbc.gov.uk](http://www.redditchbc.gov.uk)

## **Bromsgrove District Council Response to Wyre Forest Local Plan Review Preferred option - August 2017**

1 Thank you for the opportunity to comment on the Wyre Forest Local Plan Review Preferred option, the below comments at this stage represents an officer response. Due to the timescales for consultation, there have not been any appropriate Council meetings for this response to be considered formally. This process will take place in September and should any amendments be required as a result of the formal consideration by Bromsgrove District Council we will advise you in due course.

2 The Council supports the aims and objectives of the plan and think that it has the potential to provide a strong base for planning in Wyre Forest once adopted, although a number of reservations do exist where clarity needs to be provided in order to the Councils concerns to be allayed. It must be stressed at this stage the Council wish to see all areas thrive and develop sustainably, and do not have an in-principal objection to Wyre Forest District Council allocating land for future growth, or developing policies to improve the quality of the environment across the District for its residents and visitors.

3 Our comments are restricted to the elements of the plan where possible issues arise for Bromsgrove as a result of the draft plan, whilst we have read and considered the remaining sections we do not feel it is appropriate or necessary for the Council to comment on policies developed to address local issues to Wyre Forest District only.

4 The Plan identifies a housing requirement of 5400 dwellings, 540 care home beds and 40 hectares of employment land, BDC has no reason to dispute those figures. The Council is also pleased to see in para 6.8 that under the duty to cooperate WFDC will continue to liaise with all adjoining authorities. It will be important for WFDC to continue this liaison as the plan progresses, it is acknowledged that Wyre Forest District does not form part of the wider Birmingham Housing Market Area (BHMA) and as such should not directly need to accommodate any additional growth needs arising from the BHMA. The continued liaison will be important to ensure that if all the needs of the BHMA cannot be met within the currently identified geographic area, then it could be that those areas on the periphery may need to assist in meeting those needs if it can be done sustainably. It is important the review of the Wyre Forest Local Plan has sufficient mechanisms in place to be able to respond appropriately to any requests to meet the needs of the wider BHMA should a request be forthcoming.

4 The main concern of the Council is the location of the larger core housing sites, the fact that a preferred option is not specified, and that we are requested to make a choice of option A or option B in relation to significant development. The core housing sites, and also the majority of the option A and B sites are all situated towards the eastern / north eastern extent of the urban area of Kidderminster. As the principal town the logic of allocating significant levels of development to the most sustainable settlement is understood and accepted.

5 Where the Council have concerns is the evidence which support these allocations, in particular the transport evidence which is required to support allocations of this size. It is clear from the Infrastructure Delivery Plan (IDP) that some consideration has been given to transport issues. What is concerning is that a preference for a preferred option is being sought without all the

identified evidence i.e. the modelling through the Wyre Forest Transport Model (WFTM), and the transport background paper being available.

The IDP states at 3.1.4

*It should also be noted that local impacts of individual potential development sites can be more easily identified; however, the cumulative impact of development on both the local and wider strategic network is difficult to quantify without undertaking modelling. As detailed above, the WFTM will be used to fully assess all development sites, both individually and cumulatively, to ensure a robust assessment of the likely transport related infrastructure is identified and all appropriate multimodal infrastructure identified to support the preferred option.*

6 Attempts have clearly been made to establish the infrastructure requirements for both the core option, and also options A and B. A comparison of the different highways impacts of options A and B has also been provided, unfortunately, this level of analysis does not allow for a sufficiently informed decision on the merits of the various options to be reached at this stage. Similarly whilst it is welcomed that a list of schemes has been developed to identify possible mitigation, what is not clear is exactly what these schemes entail, when and how they will be delivered, and how much impact their introduction will have on both mitigating the impacts of development or addressing existing infrastructure concerns.

7 Option A appears to offer the prospect of an eastern relief road which amongst other things could reduce the congestion and improve the air quality within Kidderminster town centre, both of these results would undoubtedly be beneficial. What needs to be established is the impact of such a significant piece of infrastructure on areas outside of the District. Of particular concern would be what additional traffic as a result of significant development and improved infrastructure around the eastern edge of Kidderminster would then permeate to areas further east into Bromsgrove. The same point applies if option A does not become the preferred option, it is still likely that additional traffic could use the infrastructure in Bromsgrove as a result of option B although without the bypass, again this needs to be established for an informed decision to be made on the pros and cons of the options.

8 The Council's principal concerns in terms of specific locations which may be affected would be, along the A456 through Hagley in order to access the Black Country / Birmingham conurbation, and then further along this route to the M5 Junction 4 in order to access the motorway network or the southern areas of Birmingham. Similarly the Council has concerns on the impacts on the A448 if additional trips are made into and through Bromsgrove to access the motorway network south of the town, or through the town to access Redditch beyond. As WFDC and WCC are aware both these locations within Bromsgrove suffer from congestion and both have AQMAs, the impacts of the various options on these key locations need to be established as well as any impacts in other areas related to the development sites. This is particularly important to understand the impacts in more rural areas where 'rat running' may occur in an attempt to avoid more congested routes, and also the impact on the strategic motorway network which places pressure on all routes across the area.

9 The Council would have hoped that the transport evidence would have been further developed, and made available to inform a preferred option, and not produced afterwards to

support / justify a preferred option chosen in isolation of the evidence. This is a position that the Council through its officers has expressed a number of times in response to both the draft IDP, and also in person at a meeting convened specifically to discuss the issue of transportation. Bearing this in mind the Councils position expressed in this response should not be a surprise, but unfortunately without this evidence being available the Council is not in a position to express a preference for option A or B, or even support the core option at this stage. This concern also arises albeit to a lesser extent on allocation of land for employment uses.

10 In order to address this concern and in line with the Councils response the recently published Draft LPT4. We would like to continue to engage with both WFDC and WCC to develop a wider transport strategy for north Worcestershire. The development of this strategy should help inform the production of local and district plans which have fully evidenced and coordinated transport information. The strategy alongside these local and district plans will then deliver the infrastructure required to allow the authorities to continue to grow and thrive in a coordinated and sustainable way.

## **Redditch Borough Council Response to Wyre Forest Local Plan Review Preferred option - August 2017**

1 Thank you for the opportunity to comment on the Wyre Forest Local Plan Review Preferred option, the below comments at this stage represents an officer response. Due to the timescales for consultation, there have not been any appropriate Council meetings for this response to be considered formally. This process will take place in September and should any amendments be required as a result of the formal consideration by Redditch Borough Council we will advise you in due course.

2 The Council supports the aims and objectives of the plan and think that it has the potential to provide a strong base for planning in Wyre Forest once adopted, although a number of reservations do exist where clarity needs to be provided in order to the Councils concerns to be allayed. It must be stressed at this stage the Council wish to see all areas thrive and develop sustainably, and do not have an in-principal objection to Wyre Forest District Council allocating land for future growth, or developing policies to improve the quality of the environment across the District for its residents and visitors.

3 Our comments are restricted to the elements of the plan where possible issues may arise for Redditch as a result of the draft plan, whilst we have read and considered the remaining sections we do not feel it is appropriate or necessary for the Council to comment on policies developed to address local issues to Wyre Forest District only.

4 The Plan identifies a housing requirement of 5400 dwellings, 540 care home beds and 40 hectares of employment land, RBC has no reason to dispute those figures. The Council is also pleased to see in para 6.8 that under the duty to cooperate WFDC will continue to liaise with all adjoining authorities. It will be important for WFDC to continue this liaison as the plan progresses, it is acknowledged that Wyre Forest District does not form part of the wider Birmingham Housing Market Area (BHMA) and as such should not directly need to accommodate any additional growth needs arising from the BHMA. The continued liaison will be important to ensure that if all the needs of the BHMA cannot be met within the currently identified geographic area, then it could be that those areas on the periphery may need to assist in meeting those needs if it can be done sustainably. It is important the review of the Wyre Forest Local Plan has sufficient mechanisms in place to be able to respond appropriately to any requests to meet the needs of the wider BHMA should a request be forthcoming.

5 The main concern of the Council is the location of the larger core housing sites, the fact that a preferred option is not specified, and that we are requested to make a choice of option A or option B in relation to significant development. The core housing sites, and also the majority of the option A and B sites are all situated towards the eastern / north eastern extent of the urban area of Kidderminster. As the principal town the logic of allocating significant levels of development to the most sustainable settlement is understood and accepted.

6 Where the Council have concerns is the evidence which support these allocations, in particular the transport evidence which is required to support allocations of this size. It is clear from the Infrastructure Delivery Plan (IDP) that some consideration has been given to transport issues. What is concerning is that a preference for a preferred option is being sought without all the

identified evidence i.e. the modelling through the Wyre Forest Transport Model (WFTM), and the transport background paper being available.

The IDP states at 3.1.4

*It should also be noted that local impacts of individual potential development sites can be more easily identified; however, the cumulative impact of development on both the local and wider strategic network is difficult to quantify without undertaking modelling. As detailed above, the WFTM will be used to fully assess all development sites, both individually and cumulatively, to ensure a robust assessment of the likely transport related infrastructure is identified and all appropriate multimodal infrastructure identified to support the preferred option.*

7 Attempts have clearly been made to establish the infrastructure requirements for both the core option, and also options A and B. A comparison of the different highways impacts of options A and B has also been provided, unfortunately, this level of analysis does not allow for a sufficiently informed decision on the merits of the various options to be reached at this stage. Similarly whilst it is welcomed that a list of schemes has been developed to identify possible mitigation, what is not clear is exactly what these schemes entail, when and how they will be delivered, and how much impact their introduction will have on both mitigating the impacts of development or addressing existing infrastructure concerns.

8 Option A appears to offer the prospect of an eastern relief road which amongst other things could reduce the congestion and improve the air quality within Kidderminster town centre, both of these results would undoubtedly be beneficial. What needs to be established is the impact of such a significant piece of infrastructure on areas outside of the District. Of particular concern would be what additional traffic as a result of significant development and improved infrastructure around the eastern edge of Kidderminster would then permeate to areas further east into Bromsgrove and then onto Redditch and the strategic network. The same point applies if option A does not become the preferred option, it is still likely that additional traffic could use the infrastructure in Bromsgrove and beyond as a result of option B, although without the bypass, again this needs to be established for an informed decision to be made on the pros and cons of the options.

9 The Council has concerns on the impacts on the A448 if additional trips are made into and through Bromsgrove to access the motorway network, or through the town to access Redditch. In order to address this concern and in line with the Councils response the recently published Draft LPT4. We would like to continue to engage with both WFDC and WCC to develop a wider transport strategy for north Worcestershire. The development of this strategy should help inform the production of local and district plans which have fully evidenced and coordinated transport information. The strategy alongside these local and district plans will then deliver the infrastructure required to allow the authorities to continue to grow and thrive in a coordinated and sustainable way.

# Wyre Forest District Local Plan Pre-Submission Publication 2018

## Consultation Response Form

1<sup>st</sup> November – 17<sup>th</sup> December 2018

**REF OFFICE USE ONLY:**

Representor number:

Representation number:

Plan reference:

Tests of soundness:

This form has two parts: **Part A** Personal Details and **Part B** Your Representation

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has issued this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the public examination. Using the form to submit your comments also means that you can register your interest in speaking at the examination.

Please read the guidance notes carefully before completing the form.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. This form can be submitted electronically. If hand writing, please write clearly in blue or black ink.

Consultation response forms can be completed and submitted online at [www.wyreforestdc.gov.uk/localplanreview](http://www.wyreforestdc.gov.uk/localplanreview)

**Representations must be received by 5:00pm on 17<sup>th</sup> December 2018. Representations received after this time will not be considered duly made.**

## Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Mike	
Last Name	Dunphy	
Organisation (where relevant)	Bromsgrove District Council	
Job title (where relevant)	Strategic Planning and Conservation Manager	
Address – line 1	Parkside	
Address – line 2	Market Street	
Address – line 3	Bromsgrove	
Address – line 4		
Address – line 5		
Postcode	B61 8DA	
E-mail Address		
Telephone Number		



## Part B - Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

**Name or Organisation**

Bromsgrove District Council

### 3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

12 and 13

Other: e.g. Policies map, table, figure, key diagram

IDP / Modelling report

### 4. Do you consider the Local Plan is:

4.1 Legally Compliant

Yes

X

No

4.2 Sound

Yes

No

X

4.3 Complies with the Duty to co-operate

Yes

X

No

### 5. If you do not consider the Local Plan is sound, please specify on what grounds

Positively Prepared ☐

Justified ☒

Effective ☒

Consistent with National Policy ☒

*Please Tick as appropriate*

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

**If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.**

6.1 It is the view of Bromsgrove District Council (BDC) that unfortunately The Wyre Forest Local Plan (WFLP) is unsound, BDC do not consider that the plan is Justified, Effective, or Consistent with National Policy.

6.2 The objection focuses on Policy 12 - Strategic Infrastructure and Policy 13 - Transport and Accessibility in Wyre Forest and the evidence base which purports supports them, most notable the Infrastructure Delivery plan (IDP) and the Transport Modelling Report (TMR).

6.3 Para 16 of the NPPF requires that plans should:

- b) be prepared positively, in a way that is aspirational but deliverable;*
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*

Policy 12 is a generic policy for the requirement of infrastructure to support the plan, and Policy 13 begins to provide more detail on what infrastructure is required. It is the view of BDC that policies 12 and 13 fail to satisfy b) and d) of the framework. For the reasons expanded on in the paragraphs 6.6 to 6.20 below concerning the evidence base, BDC fail to see how the infrastructure requirements are **deliverable**. BDC also fails to see and how the policy is **clear and unambiguous** on what infrastructure is required, and when and how it is to be delivered. Of particular concern in relation to the clarity of the policy are the inconsistencies between the IDP requirements and the requirements in the policy.

#### 6.4 Para 20 of the NPPF states

*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

*b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

It is BDCs view that the concerns expressed about the evidence at para's 6.6 to 6.20 identifies that the WFLP and its evidence base does not at this stage clearly identify in a robust manner the infrastructure required or the impacts of the infrastructure, and therefore the plan is inconsistent with the requirements of para 20 of the NPPF.

#### 6.5 Para 104 of the NPPF states Planning policies should:

*b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;*

*c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;*

It is BDCs view that in relation to b) and c) above that issues identified with the evidence base at paras 6.6 to 6.20 below shows, that there is not robust evidence which has allowed for any routes to be identified and protected for the bypasses in relation to Hagley and Mustow Green. And that lack of robust evidence, which also include un-costed schemes in the IDP, does not allow for a sufficient strategy for investment in infrastructure to be developed and aligned, therefore the WFLP is not consistent with the requirements of para 104 of the NPPF.

6.6 Paras 6.3 to 6.5 above show how the policies in the WFLP are inconsistent with the requirements of the NPPF, BDCs soundness concerns are also related to the ability of the WFLP to be judged as being justified and effective, this primary concern relates to the evidence base supporting Policies 12 and 13.

6.7 It appears from the published evidence base the main supporting evidence for the transport and infrastructure policies in the WFLP are the IDP and the TMR. Reference is made in both May 2017 and October 2018 versions of the IDP to a transport evidence paper. It has been confirmed by Wyre Forest District Council (WFDC) that there is no transport evidence paper. The May 2017 IDP also states

*It should also be noted that local impacts of individual potential development sites can be more easily identified; however, the cumulative impact of development on both the local and wider strategic network is difficult to quantify without undertaking modelling. As detailed above, the WFTM will be used to fully assess all development sites, both*

*individually and cumulatively, to ensure a robust assessment of the likely transport related infrastructure is identified and all appropriate multimodal infrastructure identified to support the preferred option.*

For the reasons expanded on below BDC, do not consider that this stated intention of the previous version of the IDP has been undertaken.

6.8 The WFLP contains development allocations across the District, there are some significant allocations to the eastern and north eastern side of Kidderminster. These sites have been in the public domain for a considerable period of time, and were part of the preferred options presented by WFDC. BDC responded to the preferred option plan, expressing concern about the possible implications of development in these locations on transport infrastructure in Bromsgrove. At the time BDCs concern was the lack of evidence to allow BDC to make an informed decision on the implications for the district. Sadly little work appears to have been done to strengthen the evidence base and therefore BDCs concern remains.

6.9 turning specifically to the Transport Modelling Report (TMR) BDC has concerns that

- a) The Wyre Forest Transport model is a multi-modal model but only the highway assignment model has been used.
- b) There is a mis-match between the development assumptions in the Wyre Forest Local Plan Review (2016-2036) – Transport Modelling Report and the Wyre Forest District Council IDP.
- c) A simplistic approach to trip generation has been adopted. A single rate assumed for all residential development and a single rate assumed for all job / employment types.
- d) It is not clear whether there has been any optimisation of the highway network in the future year network.
- e) There is no definition provided of “capacity” or “congestion”.
- f) In the Appendix, information on housing is not provided for mixed use development. Housing capacity is provided for residential areas, but the number of jobs assumed for employment is not provided.

6.10 In relation to the Wyre Forest District Council IDP, the following observations are made.

- a) There is a mis-match between the development assumptions in the Wyre Forest Local Plan Review (2016-2036) – Transport Modelling Report and the Wyre Forest District Council IDP.
- b) No reference to modelling 5 years ahead, albeit the IDP refers to national guidance that states that the IDP should be clear for at least 5 years ahead
- c) There is reference to options consultation but no reference to modelling of options.
- d) The document states that where the deliverability of critical infrastructure is uncertain alternative strategies should be assessed. It is not clear if the testing of alternative strategies has been undertaken in the (highway) modelling.
- e) There is no definition provided of “capacity” or “congestion”, so it is not clear how infrastructure needs have been identified.
- f) Not clear how network capacity has been maximised albeit the document states that there is a need to demonstrate that capacity has been maximised.
- g) Not clear on how infrastructure needs have been identified as there is no reference provided to an appraisal or sifting process or definition of need.

6.11 The reason why these elements are a concern and lead to a conclusion of unsoundness relates to the identification of additional congestion on the A456 through Hagley

in Bromsgrove. Also the identification of additional congestion on the A448 at Mustow Green which the main route between Bromsgrove and Kidderminster is a similar concern. Both these locations have now been identified as requiring bypasses. It must be stated that in principle BDC does not necessarily object to these bypass proposals, providing they are underpinned by robust evidence of need, and more importantly delivery. But for BDC to get to this position it needs to be clear that these proposals are the correct form of mitigation when considered against other options in these locations, and it needs to be clear what the wider cumulative impacts of these proposals are on transport infrastructure. This is important because once the need for them is robustly established; it needs to be clear how these and other proposals will be funded and delivered in a coordinated way. The WFLP requires infrastructure to align with allocated development as they progress to provide the correct mitigation, although it does appear no actual phasing appears in the plan. BDC is unable to establish that a robust process has been undertaken in identifying these schemes as the correct schemes. BDC is also unable to form any view based on the evidence of the likelihood of these schemes being enabled or delivered by the WFLP

6.12 In more detail BDC cannot understand the assessment process that has been undertaken to determine the bypass is needed. The adopted Local Transport Plan 4 LTP4 highlights that a review of the junctions in Hagley should take place, to be funded by developers and the LTP. Notwithstanding the technical concerns highlighted at para 6.8 above, the results of the TMR appears to show further congestion in Hagley. The LTP4 junction review requirement appears to have now been superseded by a bypass, there appears to be no evidence to support the need other than the model report. The IDP states *'Using this information WCC have been able to undertake an assessment of the probable impact on the local and wider network and produce a list of the infrastructure required to support the level of growth. This assessment has been undertaken using the Wyre Forest Transport Model (WFTM).'* The TMR does not mention the mitigation required, it simply shows where the network is affected by development, there are no other published reports referencing the WFTM. Therefore trying to work out how all the schemes have been assessed as being the required, and appropriate mitigation for the level of impact is impossible to do based on the published evidence. The same applies to the Mustow green scenario where a junction enhancement scheme has been replaced with a bypass. Policy 13 of the WFLP still refers to a junction enhancement scheme, this is the inconsistency referred to at para 6.3 above.

6.13 It is a fact that the IDP schemes haven't been modelled for their impact, as they are not referenced in the TMR. So it is unclear not only what impact a Hagley bypass will have in reducing congestion in Hagley but it is not clear what impact a Hagley bypass might have on other locations, these impacts maybe both positive and negative. The same can be said for the bypass around Mustow Green. For example the Mustow Green Scheme might have an impact on Bromsgrove Town if it increases the volumes which are able to use the A448. Similarly the enhancement scheme on the A450 corridor might have an impact on Hagley if it improves the attractiveness of this route, how would / has that then be factored into the bypass proposals at Hagley. It is accepted that transport planning / modelling is not an exact science, and there will always be impacts of schemes which will not be able to be quantified. In this instance again appears to be is no work which attempts to identify how all these transport schemes work together to mitigate the cumulative impacts of all the developments in Wyre Forest. For these reasons alone BDC does not feel that the WFLP is sound, as key proposals required both within the district but also outside are not robustly justified.

6.14 It could be seen as strange that BDC are objecting to a plan which on the face of it is providing a solution to a known issue; congestion in Hagley. The robust justification for a scheme is directly related to the ability to implement the required scheme. Therefore BDC

cannot support the plan if, the need for the scheme is not justified to the extent that its ability to be implemented becomes clear and deliverable.

6.15 The Hagley bypass scheme as identified in the IDP does not have a cost associated with it, the Mustow Green bypass scheme has a £12 million cost associated with it. Neither scheme as far as BDC can ascertain has got a plan which shows the alignment of the road or any technical considerations. Purely by looking at a map, a bypass around Mustow Green would appear to be a shorter piece of road than a bypass around Hagley. Therefore we can only assume that the Hagley scheme will be in excess of £12 million, this is a significant amount of funding which does not have any certainty at this stage. BDC acknowledge that this is a very crude assumption to make on cost, and there are many issues such as underground services etc which can significantly affect the final amount. It is also accepted that as the detail of schemes are worked up more detailed cost estimates can be made. It appears the costs that have been used to inform the viability work, which is part of the evidence base to the plan, are not reflective of or have been informed by these schemes. The approach in the viability work is to use a typical infrastructure cost. However in this instance this typical cost cannot account for all the typical or abnormal costs, as so many of them are yet to be identified.

6.16 It is noted at para 12.3 of the WFLP that

*The Council will consider wider infrastructure funding streams as part of the Local Plan Review process and in due course will consider the introduction of a Community Infrastructure Levy in conjunction with the latest Planning Obligations SPD, as adopted by the Council in September 2016.*

6.17 BDC do not understand why the consideration of infrastructure funding streams would be left for a plan review to decide. This wording appears verbatim in the preferred option version of the plan and therefore maybe a drafting error. If this is the case then it would suggest that this plan should have considered the funding streams. BDC cannot see where this has been done with any rigour. If a CIL is the mechanism to fund the plans infrastructure, then it would need to be clearly timetabled, and then progressed in line with that timetable to ensure the benefits of having a CIL are realised from all the development in the plan. This would appear to be key for WFDC so many infrastructure schemes have been identified. The Local Development Scheme states that the position on a CIL will be considered alongside the preparation of the pre-submission plan. There is no timetable for the production of a CIL and the WFLP does not clarify the position on CIL. The inconsistent costing information and complete lack of costing in relation to the Hagley bypass, and an uncertain policy regime about infrastructure delivery casts doubt on the funding of a bypass for Hagley.

6.18 The IDP has a lot of high cost schemes in it, and a lot of possibly expensive schemes which have yet to be costed, including the Hagley bypass. If the evidence isn't robust to support the specific requirement for these schemes as a result of development, the likelihood of them being funded by developers or other mechanisms such as Central Government or LEP money is uncertain. Where there are lots of competing schemes it is expected that funding normally will be directed at those which provide the greatest direct benefit, such as enabling housing development or providing for economic activity. From the information provided BDC has no way of understanding how much development from specific allocations impacts on Hagley to justify the bypass. This lack of information then makes it impossible to understand the likely level of developer contribution, and therefore if not fully developer funded the likely amount of other funding required. Without being able to understand how much housing and economic development proposals such as the bypass enable, it is impossible to form a view on the likely applicability to the funding streams that are available to infrastructure providers.

6.19 It is accepted that funding regimes are not fixed, and change as government policy is amended, meaning different levels of finance become available. With that in mind BDC accepts that it is not possible to have complete certainty on these issues at this stage in the planning process. But without being able to quantify the impact of individual developments on the scheme being tabled as mitigation, and then being able to quantify the impact of the mitigation even at a basic level BDC fails to see how the plan can be seen as justified, and therefore also effective if the required funding for the mitigation remains such an unresolved issue.

6.20 In Conclusion it is regrettable that BDC has to object to the plan, but unless the mitigation required supporting the plan cannot be robustly evidenced, which in turn secures the ability for it to be delivered, it is the view of BDC that the plan is unsound as it is not justified, effective, and consistent with national policy.

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

7.1 BDC consider that the wording of policies 12 and 13 could be amended to strengthen them and provide more clarity in relation to the mitigation required. But as the fundamental issue is with the evidence which underpins these policies, without a more robust evidence base BDC do not consider this plan can be made sound with simple policy wording changes.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.***

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

☐

**No** I do not wish to participate at the oral examination.

☒

**Yes** I would like to participate at the oral examination.

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

To hopefully aid the inspectors understanding of the particular local circumstances specific to the objections raised.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**Data Protection**

The information you provide on the form will be stored on a database used solely in connection with the Local Plan. Representations will be available to view on the council's website, but address, signature and contact details will not be included. However, as copies of representations must be made available for public inspection, they cannot be treated as confidential and will be available for inspection in full. Copies of all representations will also be provided to the Planning Inspectorate as part of the submission of the Wyre Forest District Local Plan. By submitting this form you are agreeing to these conditions.

*Please see the Councils Data Protection and Privacy statement:*

<http://www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx>

X

If you are submitting this form electronically you will need to agree to our data protection policy. Please tick here if you agree.

Signature

Mike Dunphy

Date 12<sup>th</sup> December 2018

Please return the completed form by **no later than 5:00pm on 17 December 2018** to:

Email: [LPR@wyreforestdc.gov.uk](mailto:LPR@wyreforestdc.gov.uk)

Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

Consultation response forms can be completed and submitted online at: [www.wyreforestdc.gov.uk/localplanreview](http://www.wyreforestdc.gov.uk/localplanreview)

# Wyre Forest District Local Plan Pre-Submission Publication 2019

## Consultation Response Form

2 September – 14 October 2019

**REF OFFICE USE ONLY:**

Representor number:

Representation number:

Plan reference:

Tests of soundness:

This form has two parts: **Part A** Personal Details and **Part B** Your Comments

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has issued this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the public examination. Using the form to submit your comments also means that you can register your interest in speaking at the examination.

**Please read the guidance notes carefully before completing the form.** If you responded to the last Pre-Submission consultation held in 2018, you do not have to respond again unless you want to add to them, withdraw them or make completely new comments.

Please fill in a separate part B for each issue/comments you wish to make.

Any additional sheets must be clearly referenced. This form can be submitted electronically. If hand writing, please write clearly in blue or black ink.

Consultation response forms can be completed and submitted online at [www.wyreforestdc.gov.uk/localplanreview](http://www.wyreforestdc.gov.uk/localplanreview)

**Comments must be received by 5:00pm on 14 October 2019. Comments received after this time will not be considered.**

## Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Mike	
Last Name	Dunphy	
Organisation (where relevant)	Bromsgrove District Council	
Job title (where relevant)	Strategic Planning and Conservation Manager	
Address – line 1	Parkside	
Address – line 2	Market Street	
Address – line 3	Bromsgrove	
Postcode	B61 8DA	
E-mail Address		
Telephone Number		



## Part B - Please use a separate sheet for each comment

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

**Name or Organisation**

Bromsgrove District Council

### 3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

X

No

#### a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

N/A See below

Yes, specific comments

N/A See below

#### b) If specific comments only, please specify which ones?

BDC made comments to the 2018 pre submission. Previous comments still stand and BDC would like to add to them, as per section 9 below.

### 4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

X

No

Pre-Submission Local Plan (October 2018 version)

Yes

X

No

### 5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

Policy

12 and 13

Other: e.g. Policies map,  
table, figure, key diagram

IDP / Modelling  
report / transport  
evidence base

**6. Do you want to support/object/comment on this part of the Local Plan?:**

Support

☐

Comment

☐

Object

☒

**7. Do you consider the Local Plan is:**

a) Legally Compliant

Yes

☒

No

☐

b) Sound

Yes

☐

No

☒

c) Complies with the Duty to co-operate

Yes

☐  
See section 9  
comments

No

☐  
See section 9  
comments

**8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)**

Positively Prepared ☐

Justified ☒

Effective ☒

Consistent with National Policy ☒

*Please Tick as appropriate*

**9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.**

See separate document

**10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

BDC considers that the wording of policies 12 and 13 could be amended to strengthen them and provide more clarity in relation to the mitigation required. However, as the fundamental issue is with the evidence which underpins these policies, without more robust evidence base BDC still does not consider this plan can be made sound with simple policy wording changes.

If it can be demonstrated clearly what the impacts of development are on infrastructure in Bromsgrove, then a clear policy requirement for the delivery of cross boundary infrastructure will need to be included in the plan.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?**

☐

**No** I do not wish to speak at the examination.

☒

**Yes** I would like to speak at the examination.

**12. If you wish to speak at the examination, please outline why you consider this to be necessary:**

To hopefully aid the inspector's understanding of the particular local circumstances specific to the objections raised.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to speak at the examination.

**13. Are there any other comments you would like to make?:**

All our comments have been made in the relation to section 9 above.

Expand box / continue on a separate sheet if necessary

**Data Protection**

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*Please see the Council's Data Protection and Privacy statement:*

<http://www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx>

**By signing this form you are agreeing to The Council's Data Protection Policy above and the storage of your information.**

Signature

Mike Dunphy

Date

14<sup>th</sup> October 2019

Please return the completed form by **no later than 5:00pm on 14 October 2019** to:

Email: [LPR@wyreforestdc.gov.uk](mailto:LPR@wyreforestdc.gov.uk)

Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

Consultation response forms can be completed and submitted online at: [www.wyreforestdc.gov.uk/localplanreview](http://www.wyreforestdc.gov.uk/localplanreview)



## Introduction

1. The previous comments submitted by Bromsgrove District Council BDC in relation to this plan still stand, the comments below expand on those submitted previously. At the time of submission they are submitted as officer comments, they will be presented to BDC members in due course for their consideration.
2. It remains the view of BDC that unfortunately The Wyre Forest Local Plan (WFLP) is unsound, BDC do not consider that the plan is Justified, Effective, or Consistent with National Policy. It is also unfortunate that BDC also now raises concerns about whether the requirements of the Duty to Co-operate have been met.

## Evidence concerns

3. Without repeating the previous concerns verbatim the issue that BDC has is that it is still unclear as to what the transport impacts are, of the WFLP on Bromsgrove District. Concerns were expressed previously on the clarity of the work provided to support the 2018 publication version of the plan. Although efforts have been made to address these concerns, the fact remains that from the published information it is, in the view of BDC, not possible to clearly see what the impacts of the developments sites are, and then clearly understand the mitigation strategy.
4. The need for a more robust transport evidence base has been something that BDC has been raising throughout the development of the WFLP. In response to BDCs November 2018 objection, further discussions took place in February and March 2019 where BDC continued to express its position, with WCC officers in attendance. It is BDCs understanding that these discussions in part led to the additional document that has been published, *Wyre Forest Local Plan Review, Transport Evidence June 2019*. It had been hoped that the content of this document would have addressed the previous concerns BDC raised but unfortunately it does not do this. The position of BDC is, and has always been, that the Council would like to be able to understand the impacts of the plan on the infrastructure within Bromsgrove District, and then to clearly understand how the proposed mitigation and its delivery has been arrived at.
5. Unfortunately the Wyre Forest Local Plan Review, Transport Evidence June 2019 does not satisfy this information gap. It is the view of BDC that the document has flaws. The document at section 4 attempts to suggest that an assessment has been done to confirm that the model is fit for purpose. BDC does not see how any actual assessment has been done, and consider that it is not possible to make the conclusion at para 4.6 based on the information in the preceding section.
6. A more significant concern is that although there is new information in this report, it is still not possible to ascertain from the information provided what the actual impact of development would be. The document shows that flows and journey times will increase in many locations, but without a base year, or updated base year to compare against, all that can be concluded is that there will be more trips on the network. Without being able to compare a scenario where WFLP developments are not present, and where WFLP developments are present, understanding what the actual impacts of development are, is impossible.
7. Another concern with this piece of evidence is that there is no modelling with any mitigation included. Therefore from the evidence available it is not possible to understand if the suggested mitigation in the Infrastructure Delivery Plan (IDP) actually mitigates both individual development sites and also the cumulative impacts of the WFLP.

### Infrastructure Delivery Plan

8. Turning to the IDP the BDC position remains the same as previously expressed. The Council's previous concerns centered on the untested and in some cases un-costed schemes and proposals in the IDP. Whilst it is acknowledged that changes have been made to the IDP it is still unclear what the links are between the impact of development and the mitigation that is specified. This is a particular concern for the A456 through Hagley, where previous proposals for a bypass have been softened and the need for a wider review working with other councils seems to have replaced this proposal. BDC has no objection in principle to a wider review of transport infrastructure; indeed it would expect this consideration to come to the fore as the review of the Bromsgrove District Plan gathers momentum. However it is not considered appropriate at this stage to leave it to a wider infrastructure review to mitigate the specific impacts of the WFLP, should they ever be clearly identified, it maybe that the impacts are not significant to warrant such a review or if the impacts are proved to be significant, it is something which may be too late to address via plan making.
9. It is also considered that the Duty to Cooperate and Statements of Common ground that BDC will prepare to support its plan are not the place to decide what infrastructure is required to support the developments in Wyre Forest, as para 3.1.21 of the IDP seems to be suggesting. It is the view of BDC that the infrastructure needs of the WFLP need to be clearly identified in the evidence that supports that plan, and mechanisms put in place to allow for any cross border infrastructure to be delivered. BDC has a strong track record of such an approach both working with Birmingham City Council on the Longbridge Area Action plan, and more recently in working with Redditch Borough Council in providing cross boundary allocations in Bromsgrove District to meet the needs of Redditch Borough.
10. Para 3.1.24 of the IDP discusses the rail enhancement taking place at Blakedown station. BDC does not have an objection in principle to this enhancement. However there are concerns with the following statement:

*'Enhancements to parking facilities at Blakedown Station will also help to mitigate the impact of growth on Hagley within Bromsgrove District. Hagley currently suffers from congestion at peak times and this is considered to be a first step in reducing congestion before wider strategic improvements can be considered and implemented.'*

It is not clear how the addition of parking at this station combined with other strategies such as improving of the A450 corridor work together to reduce congestion in Hagley. It could be argued that improving the A450 corridor without complementary improvements on the Hagley area just allows the congestion to get to Hagley quicker. It is of interest to BDC to understand the amount of congestion that improvements at Blakedown will relieve in Hagley, and also the process which has been undertaken to identify this reduction.

### Duty to Co-operate

11. The above paragraphs largely reiterate the concerns that BDC has over the robustness of evidence base to support the plan. BDC considers it has engaged fully in the attempts to ensure that the DTC has been met. As highlighted above these evidence related issues are longstanding concerns that BDC has expressed many times. It had been hoped that early engagement initiated by BDC in May 2018, where

concerns were expressed about the evidence base that was being worked on to support the previous publication version on the WFLP, would have ensured that no objection needed to be submitted at that time; unfortunately that was not the case, and the Council's previous objection was submitted.

12. As referred to above in an attempt to ensure constructive engagement, meetings took place in February and March 2019, where a set of actions were agreed by all parties which it had hoped would result in a robust evidence base which addresses the concerns of BDC. The work which was prepared as a result of these discussions was only seen by BDC in June 2019.
13. In June 2019 WFDC published the local plan documents as part of its Overview and scrutiny agenda for the meeting of 4<sup>th</sup> July 2019. On initial review of these documents BDC again expressed concerns that this evidence still does not address the longstanding issue of clarity of the development impacts. It was agreed that a DTC meeting needed to take place. This meeting took place on the 30<sup>th</sup> July 2019, at this meeting a set of actions were agreed which would provide BDC the information it sought, in particular the impacts of development on the Hagley area. It was agreed that this information should be provided for the 29<sup>th</sup> August 2019, prior to the representation period on the publication version of the plan opening. A meeting was penciled in to discuss this additional work on the 29<sup>th</sup> August. Subsequent to this meeting it is understood that WFDC contacted WCC separately to request that the work is not provided for the 29<sup>th</sup> August as agreed, minutes of that meeting confirm this;

*Following on from this meeting WFDC reviewed the proposed meeting date for discussion of Hagley paper and next steps (29<sup>th</sup> August). They concluded that as there was not time for them to review all the information in advance of the regulation 19 consultation, they would rather the meeting was postponed until late September to allow more time for the paper to be prepared and reviewed and the consultation to commence.*

14. On receiving notification on the minute above BDC requested a further amendment was made to the minutes as below,

*BDC must point out on the record that the reason for the timescale was to allow for all the documents to be available for the start of the representations period. We have reservations about this revised timescale for the publication of the work and the possible implication that BDC and other stakeholders will not have full access to the evidence for the full duration of the regulation 19 representation period.*

15. At the time of writing this representation the information which was agreed on the meeting of the 29<sup>th</sup> July has still not been provided, and therefore this objection has had to be drafted.

#### Concluding Comments

16. BDC continues to raise concerns about the lack of a robust evidence base and, also unfortunately raises potential concerns about the ability of WFDC to meet the DTC. It is hoped that working within the relevant regulations which dictate the plan making process from this point forward, and by continuing to engage with Wyre Forest District Council and Worcestershire County Council, that a solution to the issues above can be found in advance of the submission of the Wyre Forest Local

Plan. The outcomes of this ongoing engagement can then be reported in the Statement of Common ground which we understand will accompany the submission.





## Appendix 5

**Helen Smith**  
**Spatial Planning Manager**  
tel: 01562 732928  
fax: 01562 732556

your ref:  
17<sup>th</sup> September 2019

Dear Mrs Bamford,

Re: Wyre Forest Local Plan Pre-Submission Publication Consultation

Thank you for your recent letter dated 10<sup>th</sup> September 2019. It is disappointing to hear that you still have concerns about our Local Plan. We have now undertaken a number of Duty to Cooperate meetings with Mike Dunphy (BDC) and also colleagues from Worcestershire County Council to discuss the highways concerns that BDC have, in particular with regard to traffic congestion in Hagley.

In the current Pre-Submission consultation, the Council, working with the County improved the clarity of the transport evidence and updated the report and produced further technical evidence to support the IDP. This approach had been discussed with Mike Dunphy during the numerous Duty to Cooperate meetings we have held with BDC since the November/December 2018 consultation. It is therefore surprising that BDC have only now requested further technical work to be undertaken; it would have been more helpful to have identified any concerns during those meetings. I note in your letter dated 10<sup>th</sup> September you do not specify what this additional technical work should consist of.

The technical evidence base documents that are being consulted on as part of our September/October 2019 consultation were agreed by WFDC Cabinet at a meeting on 16<sup>th</sup> July 2019. As I am sure you can appreciate, we cannot now add further technical evidence to our consultation. It was agreed at the last Duty to Cooperate meeting that a Statement of Common Ground would be prepared jointly between WFDC, WCC and BDC to hopefully resolve any issues still outstanding before the examination of the Local Plan commences. As a neighbouring local authority, it is hoped that we can work together in a professional, collaborative and positive manner to find solutions and a possible compromise that is agreeable to all parties involved. If you could clarify in writing the

**Economic Prosperity and Place Directorate**  
Wyre Forest House  
Finepoint Way  
Kidderminster  
Worcestershire DY11 7WF

Mike Parker, Corporate Director: Economic Prosperity and Place

nature of the additional technical work that you refer to, I suggest that we pick that up in the continued Duty to Cooperate dialogue.

As the Local Plan Pre-Submission consultation has re-opened, you have another opportunity to respond in writing to our consultation setting out clearly any concerns you may still have with our Local Plan. We will then hold a further Duty to Cooperate meeting with BDC and WCC to discuss any issues you may raise in a consultation response and prepare a Statement of Common Ground (as agreed at our last DtC meeting). Please note that the closing date for the consultation is 5pm on 14<sup>th</sup> October 2019.

We look forward to continuing to work with BDC in a positive manner as part of the 'Duty to Cooperate' that each Local Authority has a responsibility to adhere to.

Yours sincerely,

A rectangular area of the document has been redacted with a solid yellow background, obscuring the signature of Helen Smith.

Helen Smith  
Spatial Planning Manager

Planning Policy Team,  
Wyre Forest District Council,  
Wyre Forest House,  
Finepoint Way,  
Kidderminster,  
DY11 7WF  
By email [LPR@wyreforestdc.gov.uk](mailto:LPR@wyreforestdc.gov.uk)



**Bromsgrove**  
District Council  
[www.bromsgrove.gov.uk](http://www.bromsgrove.gov.uk)

[strategicplanning@bromsgroveandredditch.gov.uk](mailto:strategicplanning@bromsgroveandredditch.gov.uk)

10<sup>th</sup> September 2019

Dear Planning Policy Team

Wyre Forest Local Plan Pre-Submission Publication Consultation

I write in connection to the above, on Monday 2<sup>nd</sup> September 2019 WFDC published its Local Plan Review (LPR) pre submission version for the second time; BDC officers have concerns about the processes surrounding this representations period.

As you will be aware BDC officers have met with WFDC a number of times to discuss its plan review, a consistent theme of these discussions has been infrastructure provision, particularly transport infrastructure provision. The need to provide a clear set of transport proposals to support and enable the growth in the WFDC LPR formed part of this Council's response to the preferred option version of the plan in August 2017. At that point there was very little transport evidence to support the plan, although BDC was assured by WFDC/WCC that fuller/more complete evidence would be provided in due course.

By the time of the November 2018 version of the WFDC plan, some additional work had been done in relation to transport evidence/information. Unfortunately in BDC's view this work did not provide clarity on the likely impacts, and required mitigation of the WFDC LPR development sites on infrastructure within Bromsgrove District, as a result an objection to the LPR was submitted to that effect. BDC officers have since met with WFDC and WCC to discuss these concerns.

In July 2019 further documents were published by WFDC. BDC officers met with WFDC and WCC officers in late July where officers again outlined possible concerns with the level of evidence provided. As a result a set of tasks was agreed which it was hoped would help solve the issue. It was agreed the tasks would be completed by the end of August, to allow for this additional work to form part of the pre-submission representation period.

A follow-on meeting, to again include officers from WCC, BDC and WFDC was scheduled for the 29<sup>th</sup> of August to discuss the outcomes of this work. Separately from the meeting WFDC advised WCC that the meeting should be cancelled, and the additional work would not be needed for the beginning of the reps period, WFDC asked that the work is done for later in September.

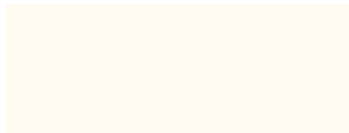
As a result of this BDC officers are now in a position whereby we consider the evidence base which has been published to support the 2019 Wyre Forest Local Plan Pre-Submission Publication

document is currently incomplete. Therefore the ability of the Council to respond fully in this representation period is severely hampered by all the relevant evidence not being available to inform our response for the full 6 weeks of available time. This position is one which will also affect other stakeholders in the LPR process such as the Parish Councils within Bromsgrove.

We would be grateful if WFDC could confirm that further documents are to be published in relation to this representations period, and what actions will be taken to allow BDC and other stakeholders to make fully informed representation on the LPR.

We would be grateful if you could respond by the 17<sup>th</sup> September 2019

Yours sincerely



Ruth Bamford  
Head of Planning and Regeneration  
Bromsgrove District Council

CC Bromsgrove District Parish Councils



# Transport Demand in the Hagley Area January 2020

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## 1. Introduction

- 1.1 The village of Hagley is in the Bromsgrove District of Worcestershire, in the very north of the County, close to the boundary with the West Midlands Conurbation (specifically Dudley Metropolitan Borough Council area).
- 1.2 The A456 passes through Hagley village, linking the Wyre Forest and a wide, dispersed rural population to the west with the West Midlands Conurbation and the motorway network (M5, Junction 3) to the east, with connections to the M6 and the rest of the national motorway network. The A491 intersects this corridor from north to south, connecting Dudley to the north with M5 Junction 4 to the south, with onward connections to the M42 (for Birmingham Airport/NEC), London and the South East (via the M40) and Bristol and the South West (via the M5 south)
- 1.3 A map of the local highway network in the Hagley area is provided below in Figure 1.

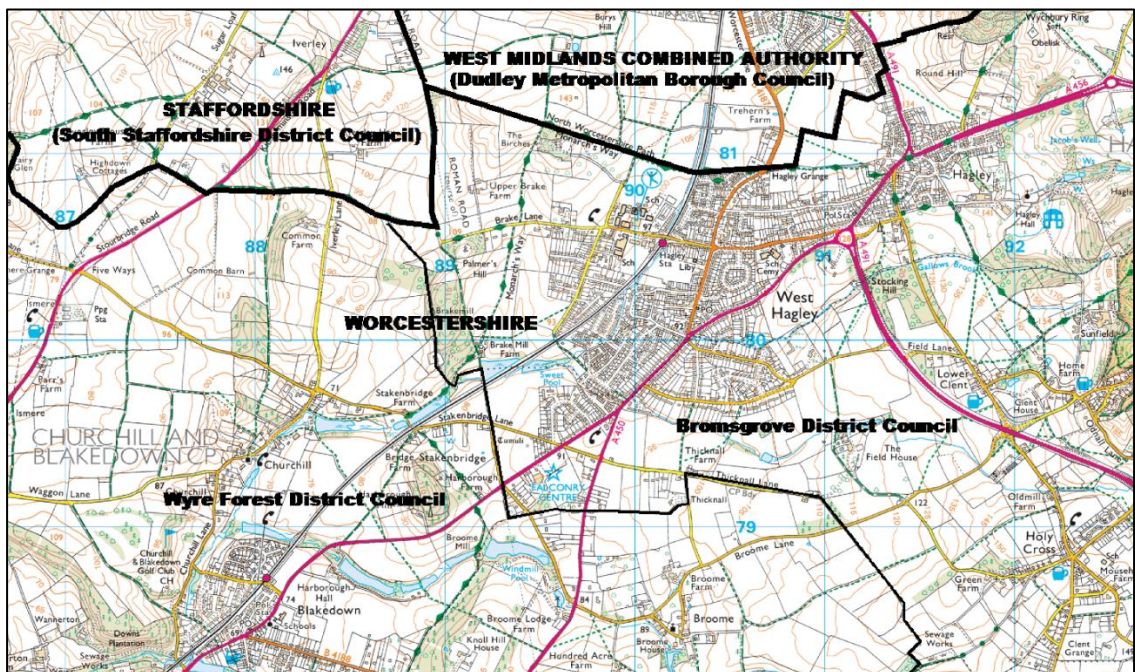


FIGURE 1 – MAP OF HAGLEY VILLAGE AND THE LOCAL HIGHWAY NETWORK

- 1.4 As such, Hagley village's highway network is at the crossroads of two nationally significant transport corridors. It is perhaps unsurprising that both routes have been proposed for inclusion in the Government's proposed Major Roads Network, which is aimed to complement the Strategic Road Network as roads which carry a high proportion of traffic with a national economic significance.

## 2. Census 2011 Travel Demand Analysis for the A456 Corridor

- 2.1 Evidence suggests that the A456 is the principal route between the Wyre Forest Towns and the M5 (either northbound via Junction 3/A456) or southbound via Junction 4/A491), which is logical, given the access opportunities that this route provides to the Birmingham Box (M5/M6/M42), Birmingham Airport, the NEC and wider UK destinations.
- 2.2 Alternative access routes to the motorway network from the Wyre Forest Towns include the A449 (southbound for M5 Junction 6), A448 (eastbound via Bromsgrove for M42, Junction 1) and A442 (south bound for M5 Junction 5). Some traffic also rat-runs through Belbroughton using the B4188 to bypass Hagley, although as this report focuses specifically on the A456, these routes will not be considered in any further detail in this report.
- 2.3 In 2011, the A456 through Hagley carried 31,852 vehicles per day<sup>1</sup> (Annual Average Daily Traffic or AADT), of which:
- 25,495 were cars and taxis (80%)
  - 6,090 were LGVs/HGVs (19%)
  - 319 were buses, coaches, motorcycles and cycles (1%)
- 2.4 The Census of 2011, being the most recent data source from which to assess travel demand, identifies that the Wyre Forest was a relatively 'contained' economy. Specifically, a significant proportion of residents live and work within the District (see Tables 1 and 2, below).

DISTRICT OF RESIDENCE (ORIGIN)	Commuting to Wyre Forest District		DISTRICT OF WORK (DESTINATION)	Commuting from Wyre Forest District	
Bromsgrove	679	2%	Bromsgrove	1,186	3%
Redditch	221	1%	Redditch	478	1%
Wychavon	1,043	4%	Wychavon	3,377	9%
Wyre Forest	20,165	71%	Wyre Forest	20,165	56%
Worcester	774	3%	Worcester	2,387	7%
Malvern Hills	635	2%	Malvern Hills	717	2%
Birmingham	472	2%	Birmingham	2,318	6%
Dudley	1,924	7%	Dudley	2,473	7%
Solihull	98	0%	Solihull	277	1%
Sandwell	321	1%	Sandwell	902	2%
Stratford-on-Avon	38	0%	Stratford-on-Avon	104	0%
Walsall	118	0%	Walsall	138	0%
Coventry	23	0%	Coventry	93	0%
Wolverhampton	194	1%	Wolverhampton	395	1%
Warwick	18	0%	Warwick	116	0%
South Staffordshire	298	1%	South Staffordshire	221	1%
Shropshire	1,037	4%	Shropshire	638	2%
Herefordshire	114	0%	Herefordshire	120	0%
Tewkesbury	20	0%	Tewkesbury	80	0%
Cheltenham	23	0%	Cheltenham	48	0%
Gloucester	9	0%	Gloucester	37	0%
Rest of GB and NI	573	2%	Rest of GB and NI	1,415	4%
TOTALS	28,237		TOTALS	36,270	

TABLE 1 – NUMBERS OF WYRE FOREST EMPLOYMENT TRIPS BY ORIGIN AND DESTINATION (CENSUS 2011)

<sup>1</sup> <https://roadtraffic.dft.gov.uk/manualcountpoints/47847>



TWO WAY FLOWS	Commuting to or from the Wyre Forest District		Commuter Routes to/from Wyre Forest District and Direction of Travel
Bromsgrove	1,865	3%	A448 (East), A456 (North East)
Redditch	699	1%	A456 (North East), A448 (East)
Wychavon	4,420	7%	A449 (South), A442 (South East), Rail (South - 1% of trips)
Wyre Forest	40,330	61%	Internal
Worcester	3,161	5%	A449 (South), Rail (South - 5% of trips)
Malvern Hills	1,352	2%	A451 (South West), A456 (West), A449 (South), Rail (South - 2% of trips)
Birmingham	2,790	4%	A456 (North East), Rail (North East - 22% of trips)
Dudley	4,397	7%	A451 (North East), A449 (North East), A456 (North East)
Solihull	375	1%	A456 (North East), Rail (North East - 10% of trips)
Sandwell	1,223	2%	A456 (North East), A449 (North), Rail (North East - 5% of trips)
Stratford-on-Avon	142	0%	A456 (North East)
Walsall	256	0%	A456 (North East)
Coventry	116	0%	A456 (North East)
Wolverhampton	589	1%	A449 (North), A456 (North East)
Warwick	134	0%	A456 (North East)
South Staffordshire	519	1%	A449 (North)
Shropshire	1,675	3%	A442 (North), A449 (North)
Herefordshire	234	0%	A456 (West), A451 (South West)
Tewkesbury	100	0%	A449 (South)
Cheltenham	71	0%	A449 (South)
Gloucester	46	0%	A449 (South)
Rest of GB and NI	1,988	3%	Various
TOTALS	66,482		

**TABLE 2 – NUMBERS OF EMPLOYMENT JOURNEYS TO AND FROM WYRE FOREST ORIGINS AND DESTINATIONS BY TRANSPORT CORRIDOR (CENSUS 2011)**

- 2.5 The data contained in Table 2 above includes a number of assumptions about transport corridors used by employment trips to and from the Wyre Forest District. Included in the table above is the known mode share for rail (drawn from Census 2011 data).
- 2.6 From the information set out in Tables 1 and 2, when rail journeys are accounted for, it is estimated that the Wyre Forest generates between 5,500 and 6,000 employment trips which will route via the A456 through Hagley; or approximately 18% of total traffic flow.
- 2.7 Since 2011, the Wyre Forest has seen an uplift in regeneration of former derelict employment and residential sites, particularly around the former British Sugar site at Hoobrook and at Churchfields, but travel flows appear to have remained largely static since that time.
- 2.8 As identified earlier, the area immediately to the west of the Wyre Forest Towns and beyond is 'deep rural' in nature, with sparsely distributed settlements. For residents of this (geographically significant) area, the A456 is the natural corridor of choice to access the West Midlands and the Motorway network. Figure 2 below attempts to illustrate this concept of the (much) wider catchment of the A456, beyond the Wyre Forest District.

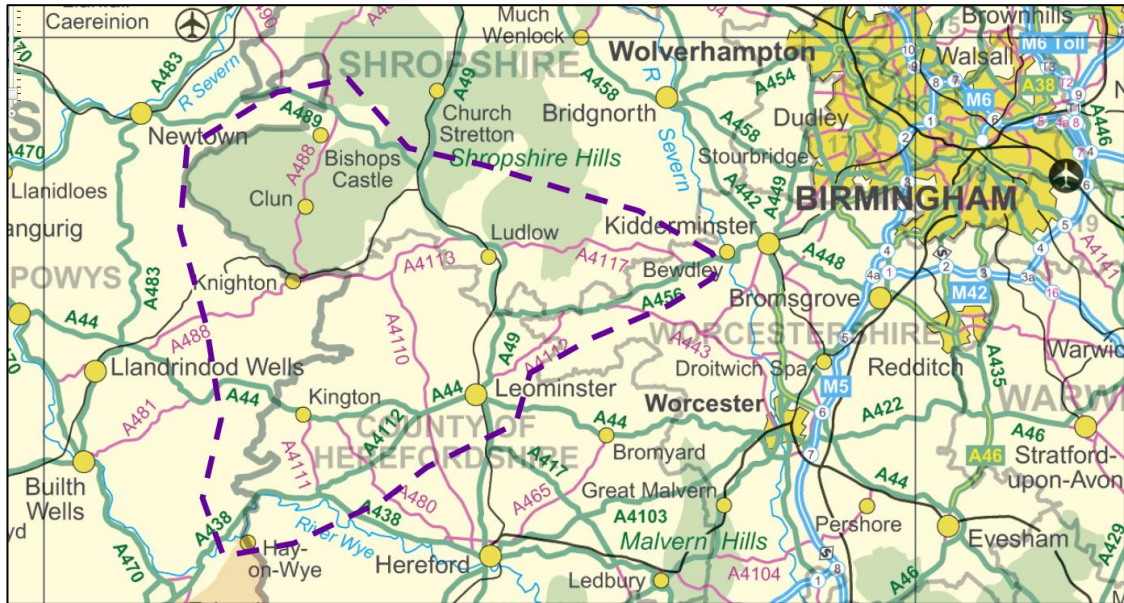


FIGURE 2 – MAP OF ASSUMED WIDER CATCHMENT OF THE A456 TRANSPORT CORRIDOR

- 2.9 The loss of much of the rural rail network in the Marches as part of the Beeching cuts means that for many residents of the area identified in Figure 2 above, driving represents the only realistic option for accessing the West Midlands Conurbation from this area. For residents of this area, the nearest rail heads offering direct access into the West Midlands Conurbation are Shrewsbury to the north, or Hereford/Ledbury to the south. To access these, a train must be taken from Ludlow (nearest railhead) to either Hereford or Shrewsbury, or users must drive to access this mode. The trip attraction of this area for employment purposes is low (particularly for higher paid professional work) so it is reasonable to assume that any growth in demand in this wider area with destinations in the West Midlands Conurbation will disproportionately affect demand to travel experienced on the A456 passing through Hagley. There is comparatively little development growth proposed in South Shropshire/North Herefordshire area, but the lure of higher paid employment in the West Midlands Conurbation may continue to stimulate increased demand to travel over time. Census data suggests that over 1,450 trips are made each day, by car, from this wider area to destinations in the West Midlands Conurbation to access employment alone. It is reasonable to assume that a significant additional volume of traffic will also be using this corridor for other purposes, including tourist traffic and business-related journeys.
- 2.10 The recently adopted West Midlands Rail Investment Strategy (2018 – 2047) proposes a new railway station to be opened at the West Midlands Safari Park, making use of the Severn Valley Railway heritage railway line. Should a suitably positive business case be identified, this could offer an opportunity to pursue significant modal transfer from road to rail for strategic trips into the West Midlands Conurbation and beyond for the rural areas to the west of the Wye Forest District.

### **3. Duty to Cooperate Meetings**

- 3.1 Worcestershire County Council has held formal Duty to Cooperate Meetings with Dudley Metropolitan Borough Council and South Staffordshire District Council, to understand the likely impacts that forecast growth in these areas may have on Worcestershire.

#### **South Staffordshire District Council**

- 3.2 Negligible growth is proposed in the southern part of South Staffordshire (which adjoins Worcestershire). As such, no impacts are expected on Worcestershire's transport networks.

#### **Dudley Metropolitan Borough Council**

- 3.3 It was identified that significant growth is proposed in the Black Country area, as set out in the Black Country Core Strategy. There are two significant housing growth corridors which have relevance: the Dudley / Brierley Hill/ Stourbridge corridor and the Brierley Hill / Stourbridge corridor. This growth is expected to place further demand on the A456 east of Hagley (within Dudley Metropolitan Borough Council's boundary) which may impact upon Worcestershire's transport networks.
- 3.4 A highway improvement scheme is due to be implemented in the near future at the Grange Roundabout (junction of A456, A459 and B4551), although this improvement scheme has been designed to cater exclusively for existing demand. It will not cater for forecast demand growth.
- 3.5 Dudley Metropolitan Borough Council's adopted transport strategy focusses investment on significant improvement of local public transport networks, to mitigate demand generated by development growth.
- 3.6 Station car parks within the West Midlands Conurbation are currently free to use, but the West Midlands Combined Authority are proposing to implement a charging regime in the near future, to discourage car-based access to rail services in line with adopted policy. It is expected that this will result in car parking charges becoming consistent across the local area. Further, it is suggested that this could displace demand currently travelling into the conurbation from Worcestershire and further afield which currently takes advantage of this. This would have the effect of making car park charges levied at Blakedown and Kidderminster Stations consistent with those in the West Midlands Conurbation.
- 3.7 Colleagues at Dudley Metropolitan Borough Council were strongly supportive of Worcestershire County Council's proposal to build a large 'rail and ride' facility at Blakedown, as this will complement their adopted transport strategy to pursue modal shift to passenger transport, before trips enter the Conurbation.

#### **Shropshire Council**

- 3.8 The Shropshire Development Plan (2015), places development focus on existing urban areas. In the context of this plan, the settlement of Bridgnorth is the closest to Worcestershire, with only 1,400 dwellings proposed for development within the plan period. There are no significant transport infrastructure or service investments proposed in the local area.
- 3.9 A Preferred Options Consultation for Strategic Sites (2019) proposes four strategic sites for major development:
- An area of search in land to the north of M54, Junction 3;
  - Market Drayton (the former Clive Barracks) 750 new dwellings beyond 2026;

- Iron Bridge (the former power stations) 1000 new dwellings beyond 2022/3;
- RAF Cosford, with a focus on further military, tourist and defence industry redevelopment.

3.10 As all of these sites are remote from Worcestershire, it was decided that a Duty to Cooperate meeting was not required with Shropshire Council, as proposed development growth would have no significant impact on Worcestershire's transport networks.

## **4. Strategic Highway Capacity Enhancement Proposals**

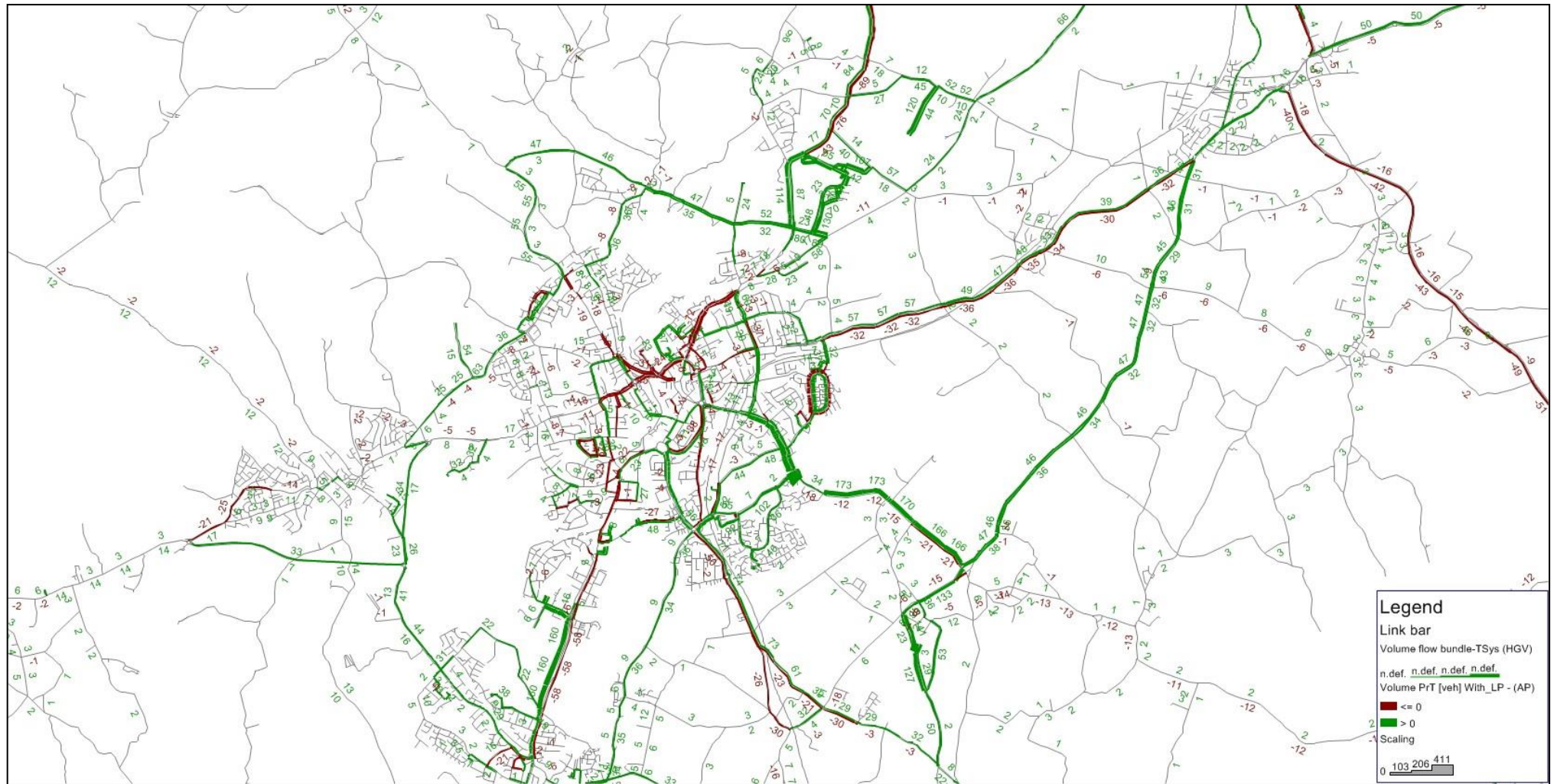
- 4.1 Midlands Connect published the Midlands Connect Strategy in March 2017. This document proposed the need for a Western Strategic Route, completing the motorway ring around the West Midlands Conurbation. Following this, Midlands Connect published a Long-Term Midlands Motorway Hub Study in partnership with Highways England, which promotes the need for this route.
- 4.2 If constructed, this route would provide a *de facto* bypass of Hagley, however, it should be noted that development of business cases to construct new motorways is notoriously complex, resulting in long lead-in times. Subject to a suitable business case being developed, it could be decades before any scheme is delivered and benefits realised. For this reason, it is suggested that the Western Strategic Route should not be considered within this context until such a point that a suitable, funded business case has been identified, together with an agreed programme for delivery.

## **5. Modelling of the Transport Demand Impacts of Proposed Growth in Wyre Forest District**

- 5.1 The Wyre Forest Transport Model (WFTM), developed in VISUM, was used to test the likely impacts of forecast development growth in the Wyre Forest, in terms of its distribution across transport networks, and in particular on the A456 corridor in the Hagley area, for a 2036 forecast year.
- 5.2 The 2036 WFTM was run both with Wyre Forest Local Plan allocations traffic (WithLP) and without local plan traffic (WithoutLP). Figure 3 to Figure 6 show difference plots between the WithLP and WithoutLP scenarios for the 2036 AM and PM peaks. The flow differences depict the impact of increased demand due to the local plan allocations as well as the re-routing effects across the modelled transport networks; with significant changes around the Wyre Forest as traffic redistributes along various routes to avoid more congested parts of the network.
- 5.3 Similarly, traffic that passes through Hagley also re-routes due to Wyre Forest Local Plan associated traffic passing through the town. The net impact of change in traffic in Hagley from various directions (A450, A456 west and east, A491 north and south, B4187 etc) is an increase of 43 vehicles inbound and 25 vehicles outbound in the 2036 AM peak hour. The corresponding values for the 2036 PM peak hour are an increase of 52 vehicles in the inbound direction and a decrease of 37 vehicles in the outbound direction. These changes are relatively low due to capacity constraints at junctions in Hagley leading to vehicles choosing alternative routes.
- 5.4 Further analysis was undertaken of the demand from the Wyre Forest Local Plan allocations that pass through Hagley. In the 2036 AM peak, the local plan developments in Wyre Forest generate 2,808 trips in total. It was calculated that 234 (8.3%) of these trips interact with the Hagley network either passing through to other destinations or with one trip end in Hagley.
- 5.5 Similarly, in the 2036 PM peak, the Wyre Forest Local Plan developments in Wyre Forest generate 2,408 trips in total of which 191 (7.9%) trips interact with the Hagley network either passing through or with one trip end in Hagley.
- 5.6 Base total highway demand with origins or destinations in the Wyre Forest District accounts for 5.6% (AM) and 6.3% (PM) of trips passing through Hagley.



FIGURE 3: GRAPHIC REPRESENTATION OF THE IMPACT OF LOCAL PLAN DEVELOPMENT TRAFFIC– 2036 AM (WITH LOCAL PLAN MINUS WITHOUT LOCAL PLAN)



**Legend**

Link bar

Volume flow bundle-TSys (HGV)

n.def. n.def. n.def. n.def.

Volume PrT [veh] With\_LP - (AP)

■ ≤ 0

■ > 0

Scaling

0 103 206 411

FIGURE 5: GRAPHIC REPRESENTATION OF THE IMPACT OF LOCAL PLAN DEVELOPMENT TRAFFIC— 2036 PM (WITH LOCAL PLAN MINUS WITHOUT LOCAL PLAN)







- 5.7 Table 3 shows the total number of trips generated by proposed Wyre Forest Local Plan developments in the Wyre Forest area in the 2036 AM and PM peaks, together with the number of trips that are forecast to route through Hagley.

	<b>Total Wyre Forest Local Plan Trips</b>	<b>Wyre Forest Local Plan Trips using A456 through Hagley</b>
<b>2036 AM Peak</b>	2,808	234 (8.3%)
<b>2036 PM Peak</b>	2,408	191 (7.9%)

**TABLE 3: LOCAL PLAN TRIPS SUMMARY**

- 5.8 In the AM peak, 234 of the 2,808 Wyre Forest Local Plan trips travel through Hagley which is equivalent to just 8.3%. In the PM peak, 191 of the 2,408 local plan trips pass through Hagley, accounting for 7.9% of Wyre Forest Local Plan trips.

## **6. Worcestershire County Council's Demand Management Approach for the A456 Corridor**

- 6.1 The significant peak time congestion which is experienced in both Kidderminster Town Centre (northern ring road) and Hagley village is likely to be acting to suppress demand on the A456 corridor. Some journeys that might have otherwise been made by car on this route may take too long or be too unreliable because of peak time congestion, which may force some people to use other routes, other modes or avoid travelling altogether.
- 6.2 The evidence included within this report suggests that forecast travel demand on the A456 arising from the Wyre Forest Local Plan will be limited. As long as proposed investment is prioritised to enhance rail infrastructure, services and facilities within the Wyre Forest District, it is reasonable to assume that this will mitigate this forecast growth in demand. In turn, it would be unreasonable to expect the Wyre Forest Local Plan to contribute to more strategic highway capacity improvements on the A456 corridor beyond the District's administrative boundary.
- 6.3 It is also important to recognise that national mobility trends are anticipated to undergo significant change. This, together with continued growth in home and flexible working patterns is forecast to result in a gradual decline in travel demand, as transport networks become increasingly efficient and telecommunications access and speed improves.
- 6.4 In the wider area, the draft Birmingham Transport Plan (January 2020) [www.birmingham.gov.uk/info/20013/roads\\_travel\\_and\\_parking/2032/draft\\_birmingham\\_transport\\_plan](http://www.birmingham.gov.uk/info/20013/roads_travel_and_parking/2032/draft_birmingham_transport_plan) represents a marked change in local approach to transport planning, with a strong focus on demand management to discourage single-occupancy car use. Undoubtedly, this will, impact on commuting patterns into the conurbation from the Wyre Forest if adopted, and if other Local Authorities follow suit.
- 6.5 Any proposal to tackle congestion by providing additional highway capacity on this corridor (such as a bypass of Hagley) would make driving on this corridor much more attractive by improving journey times and journey time reliability. In turn, this would act to release suppressed demand, resulting in an overall uplift in traffic using the corridor, which would result

in either maintaining the current status quo, or worse, a net deterioration in corridor efficiency, with linked increases in local emissions of carbon and nitrogen dioxide and deteriorated air quality.

- 6.6 In recognition of this, Worcestershire County Council's demand mitigation strategy for the A456 corridor centres on focussing investment at Blakedown Station expansion to provide strategic rail-based park and ride facilities and investing in improvements at Kidderminster station and station travel plans to support growth, in line with the sustainable development principles of the National Planning Policy Framework. Together, these stations will provide genuinely attractive travel alternatives for a significant percentage of trips using this corridor, mitigating the impacts of demand growth on the busy A456. When station car park charges come forward at stations within the West Midlands Conurbation in future, this is expected to result in a net uplift in demand to use stations in Worcestershire.
- 6.7 This approach is widely supported by National and Local Policy and best practice, including the National Planning Policy Framework (NPPF), balancing demand and making best use of existing transport infrastructure to accommodate travel demand generated by planned development growth. In line with the guidance set out in the NPPF, a bypass for Hagley will be considered only after investment has been made to exhaust alternative travel options. In the specific case of the A456, this means investment in rail infrastructure and services to enable this mode to accommodate a much greater mode share of generated trips.