

## Matter 2 – Dr Peter King

2.1 Hagley Parish Council (HPC) believes the housing target is severely excessive, and that this will considerably worsen the existing congestion problem in Hagley; and WFDC has not constructively engaged with us or BDC to propose any sufficient mitigation measures for this problem.

Wyre Forest District Council (WFDC) is entitled to adopt an ambitious plan if it so wishes, but it is not entitled to doing so without paying for (or funding) all infrastructure necessary to make that plan deliverable, without aggravating existing infrastructure problems beyond its boundary. Any attempt to do so would make the Plan unsound and not legally compliant.

Specifically, Hagley suffers from a major congestion issue on the A456, A450 and A491 roads that run through Hagley. The A456 and A491 have been proposed for inclusion in the government's proposed Major Road Network, which is aimed to complement the Strategic Road Network, as roads which carry a high proportion of traffic with a national economic significance. These roads through Hagley are already running close to (or at certain junctions above) capacity with consequent problems of congestion, air quality, and safety. In particular, the A456/A450 junction at Cross Keys, the A456/B4187/Western Road/Summervale Road junction, and the A456/A491 junctions at the Hagley Island and at the Cattle Market are severely congested in both the morning and evening peaks. East of Hagley the Hayley Green Roundabout and the Grange Roundabout in Halesowen, both on the A456 towards Birmingham, show similar congestion. The local highway network is shown in the Transport Demand in the Hagley Area report (TDHA) – Para 1.3.<sup>1</sup> The A456 carried 31,852 vehicles in a day in 2011 (Annual Average Daily Traffic – AADT, taken from TDHA). 2019 data appears in Table 1.

It is the view of HPC that proposing a housing target in excess of its actual Objectively Assessed Need, WFDC is seeking to contribute to alleviating a perceived housing land deficit in Birmingham. We wonder if this is some consequence of discussions undertaken at Greater Birmingham and Solihull Local Enterprise Partnership (GBS LEP). WFDC is a member of GBS LEP, but uniquely (or almost so) among those members is not part of the Birmingham and Black Country Housing Market Area (BBC HMA). This is shown by the *Strategic Growth Study* by GL Hearne and John Wood plc, produced on behalf of a consortium of 14 Midland councils;<sup>2</sup> also a previous study *Strategic Housing Needs Study: Stage 2 report* by Peter Brett Associates in 2014 for GBS LEP.<sup>3</sup> As such, there is (or should be) no obligation on WFDC under a duty to cooperate or otherwise to contribute to housing land need in BBC HMA. The economic structure of the area is such that those who cannot work locally will tend to work in Birmingham or the Black Country, which inevitably involves commuting.

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[http://www.worcestershire.gov.uk/download/downloads/id/12238/transport\\_demand\\_in\\_the\\_hagley\\_area\\_january\\_2020.pdf](http://www.worcestershire.gov.uk/download/downloads/id/12238/transport_demand_in_the_hagley_area_january_2020.pdf)

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[https://www.birmingham.gov.uk/downloads/download/1945/greater\\_birmingham\\_hma\\_strategic\\_growth\\_study](https://www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study), para 2.4, p.41.

<sup>3</sup> Copy submitted herewith, pp.4-5 para 2.17.

To avoid this complaint, WFDC must prove:

- That its plan will be effective in diverting enough commuters from cars using A456 through Hagley to some other route (such as rail), so as not to aggravate Hagley's problems; or
- That the amount of additional employment development plan will absorb the whole of the additional population envisaged by the Plan and that such employment development is likely to be delivered, so that the people will not commute through Hagley.

A large proportion of such people commute by car. If their destination is Birmingham, Halesowen, Sandwell (Smethwick, Tipton, Wednesbury and West Bromwich), or Walsall, they are likely to pass along A456 through Hagley on their way to and from work. Travel to Kingswinford or Wolverhampton would be by other routes (e.g. A449). Those going to Stourbridge, Lye, or Dudley may also use A456, but A451 is also an option. Congestion in Hagley is so severe in the peak travel hours that some people are using rat runs to avoid it, such as cutting down Western and Newfield Roads in Hagley to avoid part of A456.

A456 Manor Way, Halesowen	36,269	Dual carriageway
A456 Birmingham Road, Hagley	28,323	Dual carriageway
A456 Kidderminster Road Hagley (between two A491 junctions)	33,148	Dual carriageway
B4187 (measured at Oldswinford)	5,528	Single carriageway
A456 Kidderminster Road (A491 to B4187)	No data	Single carriageway with width for third lane
A456 Worcester Road (east of Cross Keys junction)	29,372	Single carriageway with third lane in places
A456 west of Blakedown	14,596	Single carriageway
A450 Harvington	10,063	Single carriageway
A491 Stourbridge Road, Hagley	28,145	split carriageway (up to 4 lanes)
Unclassified: Stakenbridge Lane	No data	Single carriageway
A491 passing through Clent parish	23,713	Dual carriageway
B4188 Belbroughton Road, Blakedown (2009)	3,634	Single carriageway
<i>Source:</i> <a href="https://roadtrafficstats.uk/worcestershire#.X7uqj8j7Q2w">https://roadtrafficstats.uk/worcestershire#.X7uqj8j7Q2w</a> .		

Some more detailed traffic statistics for 2019, the latest on the website, are as in Table 1 (vehicles per day).<sup>4</sup> There seems to be a discrepancy between the last two statistics for A456 and that A450: the first (29,372) would be expected to approximate to the total of the other two (24,659), as there is no major junction or destination to take traffic away. This is

<sup>4</sup> <https://roadtrafficstats.uk/worcestershire#.X7uqj8j7Q2w>

unlikely to be explained by traffic on B4188 or most unclassified roads, as most of these are fairly quiet roads. A significant portion of the difference may represent traffic using Stakenbridge Lane, Hagley as a means of joining A451 (towards Lea Castle village, Wolverley, or Bewdley) or continuing along Beechtree Lane towards Cookley or Kinver. The junction of A456 and Stakenbridge Lane (and Thicknall Lane) has been the location of enough accidents for safety measures to have to be introduced (currently on an experimental basis).

Rail provides an alternative means of commuting, but only to Stourbridge, Cradley Heath, and Birmingham. Destinations such as Halesowen, Dudley, much of Sandwell, Walsall, and Wolverhampton would require a change of transport, either to a bus or another train, but this is likely to discourage commuting by public transport. Furthermore, the number of people commuting by rail is quite small compared to the number commuting by car. It is very much hoped that the proposed car park at Blakedown Station will ameliorate this to some extent, but the amount of land proposed for parking is unambitious.

There is a severe shortage of station car parking on the Stourbridge to Birmingham Line near and beyond the edge of the conurbation:<sup>5</sup>

- Kidderminster – 214.
- Blakedown – currently 10, plus modest on-street parking.
- Hagley – 25, which filled up early in the morning until charges were imposed; and there is nowhere to provide any more parking.
- Stourbridge Town – none.
- Stourbridge Junction – 1029, but this is full to capacity before the end of the peak period (or was before the pandemic); and there is nowhere to provide any more parking.
- Lye – none or minimal; and there is nowhere to provide any more parking.
- Cradley Heath – 245.
- Old Hill – none, but some on-street parking possible.
- Rowley Regis – 750, which seems to be more than adequate for local demand.

Diversion of commuting from road to rail is certainly welcome, but the WFDC Plan is far too unambitious. The proposed car park for Blakedown station is welcome, but the whole of the land closest to the station should be used for parking, with the rest of the site kept as a reserve site on to which car park can later be expanded, if future experience indicates that is needed.

The traffic on A456 at Blakedown represents about 7,298 journeys (14,596/2), and at Hagley, just east of Cross Keys junction 14,686 journeys (half of 29,372). The preferred option is perhaps for 415 spaces (Station Yard 80 + say, 335 in field). If this were used to divert journeys from car to rail, it would represent a mere 5.7% (415/7300) of journeys through Blakedown, and only 2.8% (415/18,686) of journeys on A456. This represents a wholly insignificant reduction in the pressure on roads in Hagley. This mitigation is utterly *de minimis*.

Even the maximum possible car park at Blakedown would take 860 cars (Station Yard 80 + 780 in field) would respectively divert 11.8% and 5.8% respectively, which are still modest amounts, but it seems unlikely that so much traffic would be diverted from A456 in the short term, so that this maximum is unlikely to be achievable quickly. Nevertheless, the Plan ought to *reserve* the land for the extra 345 spaces (the rest of 780) for future expansion if the car

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<sup>5</sup> *Parkopedia* and *Sabaparking* websites

park proves more popular, rather than allowing it to be built upon. This is the *only* place on the whole Stourbridge line where such parking expansion would be feasible. It should not be frittered away, but, allowing housing on the specious ground that this would pay for the car park, constitutes a waste of a precious and irreplaceable resource.

**2.2** Hagley Parish Council has no view as to whether the amount of employment is appropriate, and it did not object. However, an increase in the quantity (if more was in fact deliverable) would provide work for more of the proposed increased population implied by the housing target and thus reduce the traffic pressure on A456 though Hagley.

It is, nevertheless, noted that the Plan of 2010 involved a review of employment sites and the release of some for housing or other purposes, suggesting that the demand for employment land is relatively low. This has in turn enabled WFDC (commendably) to deliver most of its past housing target on brownfield land.