

**Examination of the Wyre Forest District Local Plan 2016 – 2036
Hagley Parish Council Representation**

Matter 11 – Transport and Accessibility; Question 11.1 (i), (ii) and (iii)

N.B. This is also relevant to Matters 1 Duty to Co-operate (Question 1.4), 3 Overall Housing and Employment land requirements (Questions 3.1 a, and 3.1 b.), 4 Lea Castle (Question 4.11), and 5 Kidderminster Eastern Extension (Question 5.9)

Note: see separate document for other parts of this matter

Representor Reference: 231697

Name of speaker: Tony Helliwell

1 Hagley Neighbourhood Plan Group (on behalf of Hagley Parish Council) strongly objects to the WFLP in relation to the proposed Lea Castle and Kidderminster East developments on the basis that, whilst WF have every right to adopt an ambitious plan, they are bound by a duty to co-operate with adjoining local councils to consider the impact of their proposals and to agree mitigations where necessary. We do not believe that this process of co-operation has been satisfactorily completed. We also believe that the evidence provided as part of this process is flawed, because it has not been reviewed and is severely outdated.

2.1 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 Cala Development and at the Cattle Market are severely congested in both the morning and evening peaks. Outside 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 on the attached sketch map (Attachment 1).

2.2 The A456 carried 31,852 vehicles in a day in 2011 (Annual Average Daily Traffic – AADT, taken from TDHA) and this can only be expected to have increased since then.

2.3 There is increasing evidence of re-routing and "rat runs" being used by frustrated drivers, often on unsuitable roads. In particular the use of Stakenbridge Lane, a narrow lane with a narrow blind bend, the reported use of Belbroughton village centre to avoid Hagley altogether, and the use of Newfield Road to join the A491 and A456 avoiding the centre of Hagley, are causing concern.

3 The WFLP proposes major developments at Lea Castle and the Kidderminster Eastern Extension and many of the new residents can be expected to commute to Birmingham or

the Black Country generating more traffic on these roads (and the A456 and A450 in particular) making the existing problems worse.

Furthermore, these developments are part of an overall Plan which proposes a housing target in excess of the Objectively Assessed Need (see our responses to Matter 2 and 3).

4 BDC has raised these issues with WFDC and despite considerable discussion there has been no resolution. The Statement of Common Ground between WFDC and BDC sets out specific areas of disagreement (Document SD-10b). Hagley supports BDC in its stance. Hagley has sought to engage with WFDC and has, on various occasions, sought meetings; these approaches have not had any positive response from WFDC.

5 In its TDHA report, WCC estimates that, in the 2036 AM peak hours, the WFLP developments will generate 2808 trips in total. And that 234 (8.3%) of these trips will interact with the "Hagley Network". In the PM peak hours 191 (7.9%) additional trips through Hagley will be generated. We find these figures very hard to believe, and they are modelled using 2011 Census results which indicated that Wyre Forest was a "relatively contained economy" with 56% of residents commuting from Wyre Forest to elsewhere within Wyre Forest. We believe that these numbers are out of date and that a lot may have changed over the intervening period. However, please note that even using these numbers the A456/A450 junction in Hagley will exceed capacity in the 2036 AM peaks and is very close to capacity in the 2036 PM peaks (Jacobs A450 Corridor Enhancement Report; 4.5.2)

6 We believe that the problem of old data, which there has been no attempt to update, is a common one underlying this whole issue. In its own papers, the WFDC Infrastructure Delivery Plan and the WF Local Plan Review- Transport Evidence, WFDC accept that the base model used is now over 7 years old "*meaning that the data is now considered outdated unless it can be proven that the travel patterns and their distribution have not changed.*" They further state that "*the existing model should not therefore be used for any major scheme appraisal but it can be used for non-major schemes although it recognises that these may be at risk and open to challenge owing to model age, but could still be used in the early stages of assessment but with the likelihood of an update to the evidence requested by the decision making body.*" (Our emphasis). No such update has been undertaken. We suggest that a local plan and its implications for surrounding areas is certainly a major scheme and that therefore an appropriate update is required before the Plan can be approved.

7.1 Furthermore, as part of its response to WFDC, BDC commissioned a review of the WFLP – Transport Evidence, and the subsequent WCC report Transport Demand in the Hagley Area by Mott Macdonald. Its findings are summarised in the report as follows:

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

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

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

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

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

- *Model Validation Report;*
- *Details on a present year validation, if this was undertaken (and if not initiate this exercise);*
- *Data Collection Report;*
- *Evidence to show at which stages a VDM (Variable Demand Model) run was undertaken;*
- *Uncertainty Log;*
- *Model Forecasting Report;*
- *Select Zone Analysis with details about which developments correspond to model zones and the number of trips generated for each development;*
- *Flow difference plots between the 'with' and 'without' local plan scenarios that show total traffic flow; and*
- *Journey time analysis."*

7.2 We believe that this reinforces our point that the traffic data used in the local plan is unsound and should be reviewed. Furthermore, there is only a 2036 forecast for traffic; there is no forecast growth over the period from today and, as we know that no demonstrated validation of the 2011 data to current traffic conditions has been tabled, this means that there is no agreed traffic forecasts from 2011 to 2036. We find this extraordinary and would suggest that this is essential for sound planning.

7.3 We do appreciate that the COVID-19 pandemic makes future traffic forecasting more difficult. There are two conflicting influences on traffic numbers as a result of the pandemic; one is the move towards more home working, and the second is the desire not to travel by public transport. We will not know how these two influences play out for many, many months and our view is that, until that is clear, we should not make any adjustments for them.

8 In various documents WFDC do recognise the potential congestion problem in Hagley, and rightly raise the query as to whether further new developments in surrounding Authorities, particularly the Black Country Boroughs, could make these problems even worse. However, their only suggested solution is for a review at some point in the future, involving all of the main authorities in the area, to decide what actions are required; and this review is not tied, in their opinion to the WFLP or the timetable for its approval. This leaves Hagley in the invidious position where the WFLP may be approved, leading, by their own admission, to increased congestion without any major mitigations having been agreed or even discussed.

9 Hagley recognises the assistance of WCC in making some recent small scale changes to the A456 junctions in Hagley (A456/A450 junction at the Cross Keys and the A456/A491 junction

at the Cattle Market). We expect these changes to make some small difference to the congestion issue but, unfortunately it will not be sufficient to resolve any of the problems.

10 We welcome WCC's emphasis on rail to remove some of the traffic from the roads through Kidderminster and Hagley. We therefore support the expansion of parking at stations in the Wyre Forest to resolve the current shortage, and the consequent encouragement for a modal switch from road to rail, although we strongly believe that all opportunities for expansion at Kidderminster station should be thoroughly investigated before expansion at Blakedown is considered. The shortage of parking spaces is severe on the Kidderminster to Birmingham line; local numbers are:

- Kidderminster 214
- Blakedown 10 plus limited on street parking
- Hagley 25 (with no way to expand – confirmed by SLC Rail Report)
- Stourbridge Town Nil
- Stourbridge Junction 1029 but full from early morning before the end of the peak – prior to the pandemic

11 If Blakedown parking expansion is considered we suggest that the current proposal for 250 vehicles (SLC Report) is inadequate and unlikely to make a substantial difference to congestion on the A456 in Hagley which carries circa 32,000 vehicles per day (see 2 above). There is space for considerably more parking and previous schemes have suggested up to 860 spaces could be provided, although we recognise that a scheme of this size would have considerable implications for Blakedown.

12 We also strongly support the proposal to build a new station at the West Midlands Safari Park contained in the WCC Transport Demand in the Hagley Area report, believing that this will capture a lot of traffic before it reaches Kidderminster and then Hagley. We note however that this proposal is only at the very early stages of development, and that there is no certainty that it will go ahead and, even if it does, its completion would be late in this planning cycle.

13.1 Unless there is further action to resolve the congestion problems that already exist, and which will be exacerbated by the WFLP, the already strongly negative comments that we are receiving from Hagley residents will continue. As part of the development of our Neighbourhood Plan we have consulted widely with our residents through, initially, consultation meetings and, more recently, through a "Hagley Census"¹ which asked a series of questions about Housing, Transport and Environmental issues. These have indicated that:

- There is a major deterrent to walking or cycling in the village due to the volume of traffic and its speed.
- Elderly people report increasing social isolation (before the pandemic) as they are unwilling to leave their homes, other than in their cars.
- Residents are unwilling to let their children walk to schools in Hagley, or even to accompany them, due to the heavy traffic at peak times

¹ A Questionnaire delivered to every household in Hagley issued in early 2020 with a very high 41% response rate

13.2 We appreciate that WFDC is not responsible for the resolution of these problems but we do expect that they should recognise them and not take development action that will worsen them until such time as there are agreed mitigations in place that will, at the very least, not make the existing situation worse.

14 The NPPF requires that WFDC make sufficient provision for infrastructure for transport. We do not believe that they have done so for all of the reasons detailed above.