

Statement to the Examination in Public of the Wyre Forest Local Plan to take place in January 2021, with specific reference to Policy AM36:11 relating to the Land off Station Drive

In my responses to the consultation exercise in October 2019, I indicated my concern that the proposal to remove the Green Belt designation from the Land off Station Drive, Blakedown in order to build firstly a car park, and subsequently 50 dwellings is not legally compliant, is unsound and unjustified. I would argue that this is a decision and a policy which has been determined at a very late stage in the Local Plan process by Officers of Worcestershire County Council, and imposed on Wyre Forest District Council. My aim in this statement to the Examination in Public is to illustrate the progress of the decision through the published documents, to illustrate why Blakedown residents have responded to the Amendment to Policy 32 with such vigour.

The Land off Station Drive was purchased by Marmoris Investments Ltd., at auction in the early 2000s, having until then been used for agriculture. It was rented out to a local farmer, who continued to work the land. In 2003, during the **Wyre Forest Local Plan Review**, Inspector Stephen J Pratt rejected an application by Marmoris that the Land should be removed from Green Belt for use for car parking and residential development. Paragraph 3.142 of his report (attached, paras 3.135 – 3.143 refer) reads:

“Consequently, I can find no reasons on housing supply grounds, including affordable housing, or in terms of the physical and locational characteristics of this site that would represent the type of exceptional circumstances necessary to release the site from the Green Belt or identify it as an Area of Development Restraint.”

Because of Marmoris’ representations, the site has since then remained on the list of sites to be considered for mixed use development, but there has been no requirement to reconsider its Green Belt status, as there has been no further requirement for large scale development at Blakedown since the Blakedown Nurseries Area of Development Restraint was developed by Barratts in circa 2012-2014. Indeed, the Churchill and Blakedown Neighbourhood Plan refers specifically to small scale development in keeping with the rural environment, and preserving Green Belt land.

In the first quarter of **2017**, The Worcestershire County Council (WCC) **Local Transport Plan 4** went out to consultation – the initial document was imprecise, but did mention enhancements to Blakedown Station, and at one point the term ‘Parkway’ was used. The consultation report (attached) shows that WCC’s response to the Parish Council’s concern was:

“Please note that the LTP makes no reference to a Parkway facility at Blakedown. The proposed scheme (WFST5) focuses on enhancements to station facilities to support increased passenger use and protect the ongoing sustainability of the station.”

And further

“The LTP4 is a strategic, high level document, which is intentionally light on detail, recognising that flexibility is required to enable developed schemes to change during potentially long lead-in times. We note your comment about Parkway and Car Parks. The scheme for Blakedown Station is to upgrade the existing poor quality facilities, including the provision of a station car park, to remediate current on-street parking problems in Blakedown. The use of ‘Parkway’ in this context was to indicate the need to provide parking at this station. We will amend the LTP4 to remove reference to a ‘Parkway’ in the document.”

In the same consultation Wyre Forest DC also queried the LTP4 proposals, as follows:

“b) Kidderminster Rail Station is the second busiest in Worcestershire and should rightly be the main focus of an enhancement scheme to include improved parking provision. A full assessment should be undertaken of the impact of the growth potential for Kidderminster Station on car parking requirements at the site and network and highway capacity to access the station in the future. c) The origin and nature of the Blakedown Railway Station Enhancement Scheme (WFST5) could be helpfully provided. The justification for expanding the facilities at Blakedown Rail Station needs to be explained more fully. More analysis is

required of the impact of enhancing the provision at the station and the advantages and disadvantages that this will have for the settlement and the surrounding highway network and the Green Belt."

To which WCC responded:

"Your comments are noted on Kidderminster Railway Station and Blakedown Railway Station. These will be specifically considered in more detail as part of the new Worcestershire Rail Investment Strategy, and the outcomes of the Wyre Forest Local Plan refresh. It is our understanding that West Midlands Rail are planning additional car parking spaces at Kidderminster Station".

The next consultation exercise was that of the **WFDC Preferred Options** Paper in **July 2017**. There was no mention of the Land off Station Drive in that document, nor were there any comments from WCC suggesting that this was an omission to be corrected. There was, however, the following comment:

"The plan states that "minor changes to Green Belt boundaries may be appropriate to meet local needs or aspirations and to facilitate local and neighbourhood planning in the future". As national policy requires exceptional circumstances to justify alterations to Green Belt boundaries, and that Green Belt boundaries should be set for the plan period, we question whether local needs would be sufficient."

However, at no point does WCC (in any of the public documents which I have researched) acknowledge that the Land off Station Drive is Green Belt.

The **Worcestershire Rail Investment Strategy** (WRIS) which went to consultation in **August 2017** (report attached) bases its infrastructure plans on 100% increase in rail passenger by 2043 and aims to address both the current shortfall and to provide for further station parking capacity. The paper firstly identified the need for 10 additional parking spaces at Blakedown to accommodate the projected 100% increase in passengers. However, the paper subsequently calculated the projected need for parking spaces at a 'sensible' ratio of 1 space for every 4 passengers (as against the current 1:15), which would require an additional 69 spaces (39 if the passenger / space ratio was retained at 1:9) to accommodate a 100% at Blakedown. Currently at least 75% of regular users at Blakedown access the Station on foot. There is an agreed need for additional station parking to reduce the (free) on street parking, but the demand, even by the generous calculations of the WRIS, could and should be accommodated within the proposals for Station Yard.

WFDC were obviously concerned at the implications of the WRIS figures. Their response included the following:

"Table 3.15 on page 29 shows the car parking capacity growth at Worcestershire stations to 2043, and includes Kidderminster and Blakedown. The figures show that the car parking capacity at both Kidderminster and Blakedown is currently inadequate and will get worse in the future. The primary focus should remain improving the capacity at the Kidderminster station being the main station for Wyre Forest District. If any improvements are proposed at Blakedown then wider consideration needs to be given to the Green Belt implications and the precedent for inviting pressure for residential growth. The Wyre Forest Transport Strategy referred to on page 41, states that the key rail focus of the strategy is Kidderminster and Blakedown station enhancements and Kidderminster to Birmingham journey time enhancements."

And: *"The Council feels strongly that Blakedown should not be considered as an overspill for Kidderminster Station; Kidderminster Station should be functional in its own right to accommodate the necessary supporting infrastructure to cope with growth demand. Whilst proper provision of car parking capacity at Blakedown station would be welcomed by WFDC to help reduce the amount of cars parked on residential streets near to the station, it is important to emphasise that Kidderminster station is the main railway station for the district and this is where car parking capacity should be concentrated along with improvements to the local road network used to access the station. There is a concern that a focus on Blakedown Rail Station could encourage unsustainable trip generation out to the eastern fringes of the District." "These findings should be made available for public viewing. WFDC would be particularly interested to see what these*

findings say about Blakedown station as the WRIS refers to this as a station in need of increased car parking capacity. Has WCC done any analysis of trips to Stourbridge Junction from Wyre Forest to take advantage of free car parking at that station? The rail strategy might provide an opportunity to reduce such unsustainable trips by enhancing car parking at the main station for the district, namely Kidderminster, but possibly also in a more modest way at Blakedown (which in planning terms is a small village located in the Green Belt). WFDC would not wish to encourage unsustainable trip generation to this location in the eastern fringes of the District unless it was replacing unsustainable trips that proceed even further at present to Stourbridge. That said, our strong preference is for much enhanced car parking provision at Kidderminster.”

WCC responded:

“We are conscious of the lack of car parking capacity at Kidderminster station and the issues of peak time road traffic congestion in and around the station. We are actively pursuing a review of the station parking provision in the north of the County in order to relieve pressure on existing stations where it would be difficult to provide additional capacity without negatively impacting on the local strategic road network. We look forward to working with you to develop these options further.” and “The cost of resolving all traffic congestion issues on the approaches to Kidderminster station (if possible) would far outweigh the costs of providing car parking at Blakedown Station.”

The remaining documents relating to the subsequent steps of the consultation around this particular policy and the Land off Station Drive have already been presented for inspection, but at some point between July 2017 and October 2018, WCC have begun to demand that the Land off Station Drive be allocated for a car park (in addition to the Station Yard allocation which had already been included in the listed sites for the Submission Plan of 2018). The response to the Pre-Submission Consultation includes:

“However, the sustainable approach to rail is undermined by failure to allocate land for the further phase 2 expansion of Blakedown station and associated car parking provision. Although this may appear to be a minor matter, the consequence of this is to undermine the sustainable transport strategy which WCC have sought to achieve through the Local Transport Plan 4 and the Rail Investment Strategy, and its impact may be wider than WFDC itself.

Rail travel offers an alternative to road-based travel, particularly for local commuting into and out of the West Midlands conurbation, not only for existing and new residents, but more widely, and is an opportunity to deliver modal shift from car to rail transport which is more sustainable and will assist in reducing congestion. Delivering the phase 1 and 2 expansion of Blakedown station is critical, because to secure future funding from Government - directly or indirectly - for road improvement schemes, WCC must be able to demonstrate that all reasonable alternatives have been explored and the opportunities for sustainable travel prioritised and delivered.

Failure to allocate land for the phase 2 of Blakedown station totally undermines this case.

A suitable area of land was submitted to the plan through the call for sites, but unfortunately has not been included in the draft plan, despite it being (with regard to transport) a sustainable location. This requirement was outlined in WCC's adopted Local Transport Plan 4, and has been discussed with Wyre Forest DC officers at a number of meetings concerning the Local Plan.”

This is the first mention of any Phase 2 in public documents and does not correspond with the plans outlined in LTP4, nor with WCC response to the LTP4 consultation. There is no public record of the meetings at which this particular proposal has been discussed that I can find.

In **May 2019**, the local election returned The Progressive Alliance to power at WFDC. In **June 2019**, SLC published a report to WCC on Options for Blakedown Railway Station which focussed on making Blakedown station into a prime site for a station car park to replace to a large extent the 'additional places which had not been provided for in the redevelopment of Kidderminster Station. 'Informal discussions' with a developer had suggested a mixed use of car parking and housing. At no point in this report was the Land off Station Drive described as Green Belt, nor to the exceptional circumstances which would be required to remove Green Belt land for development.

For technical reasons, WFDC was obliged to make a number of Amendments to the Submission Plan and (under the new Progressive Alliance leadership) re-open consultation in September 2019, at which point there was the first and only consultation with residents of Churchill and Blakedown on the proposals for the Land off Station Drive. At the open consultation meeting in Blakedown on 11th September 2019 the village residents were told by a District and County Councillor member of the WFDC Planning Committee that the decision to take the land out of Green Belt for 50 dwellings and a multi-deck car park for 170 vehicles was already made, in that WCC support of the Plan was dependent on this specific policy (email trail attached). The Consultation cannot therefore be considered as in good faith and compliant with the requirements of good governance.

Further, there has been considerable confusion about the reason for taking this parcel of land out of Green Belt. In the Amendment version of September 2019, the 50 houses were intended to help offset the costs of the car park and to meet future housing need in the village – not an exceptional circumstance in NPPF terms. This was further complicated by the misuse of housing need figures which had already been rejected as erroneous by WFDC, and demonstrated as such through the work involved in developing the Churchill and Blakedown Neighbourhood Plan (See Sections 4.5.3 – 4.5.7). A subsequent further change submitted to the Inspector now amends the wording to say that *“No dwellings are to be constructed until car parking provision has been approved on the site”* which also suggests that the car park takes precedence over the housing. This confusion suggests that WFDC have included this particular Amendment which will remove the land from Green Belt not on the basis of sound judgement and exceptional need, but against their own better judgement, and in response to sustained pressure from WCC, who have implied that Wyre Forest could in future be blamed for any failure in the county transport and infrastructure development.

In a final twist, after prolonged representations from County Councillors it was announced (attached) on 4th December 2010 by Cllr. Marcus Hart that:

“Worcestershire County Council do not require the field for car parking and that with the current on street spaces in Station Drive and Station Yard this will be sufficient capacity. They evaluate the requirement up until 2036 to be 136 spaces and that at present there are 11 on Station Drive meaning an additional 125 spaces are required. Station Drive has an indicative layout of 111 spaces and this site, together with Kidderminster Rail Station should be the focus for delivery. This as you can see means, the field is not required”

On this basis, I would ask the Inspector to remove the policy from the Plan, and in doing so retain the Green Belt status of this piece of land to protect it against further development applications until such point as an exceptional and urgent need can be demonstrated.

I thank you for your attention, and will be happy to answer any questions to the best of my ability.

Sue Fowler

Resident, and former Parish Councillor of Blakedown

Extract from the Minute of the WFDC Cabinet Agenda for 16th July 2019 (from 6:00 to 6:29 pm)

“The Cabinet Member for Economic Regeneration, Planning and Capital Investments said that, by approving the Local Plan Pre-Submission Publication Document, the Council was accepting the request from Worcestershire County Council that we revisit the transport evidence on Blakedown Station and the A450 corridor.”

13th June 2019 Overview and Scrutiny Cttee. Members acknowledged the importance of the Council being able to demonstrate a 5 year land supply of housing sites, and having an up to date Local Plan to resist hostile planning applications within the District.