

Wyre Forest District Council Local Plan 2016-2036

Examination

Matter 11: Transport and accessibility; telecommunications and broadband; renewable and low carbon energy; viability; monitoring; strategic policies

(Policies 13, 18A, 24A, 24B and supporting text, appendices to document SD11)

Wyre Forest District Council Response

Contents page

	Page No.
Response to question 11.1	1
Response to question 11.2	12
Response to question 11.3	13
Response to question 11.4	20
Response to question 11.5	20
Response to question 11.6	27

Wyre Forest District Council

Wyre Forest District Local Plan (2016-2036) Examination

Matter 11: Transport and accessibility; telecommunications and broadband; renewable and low carbon energy; viability; monitoring; strategic policies

- Q11.1(i) Does the Plan and particularly Policy 13 accord with national planning policy's objectives to promote sustainable transport and actively manage patterns of growth in support of these objectives?
- 11.1.1 Policy 13 of the Plan, Part F lists several transport infrastructure schemes that have been identified in the Worcestershire Local Transport Plan as most significant for the successful implementation of the Wyre Forest Local Plan, particularly to support economic prosperity. The two railway related schemes listed in Part F are Kidderminster Transport Strategy Major Scheme (WFST 1) and Blakedown Rail Station Enhancement Scheme (WFST 5).
- 11.1.2 Worcestershire County Council (WCC) commissioned SLC Rail in summer 2020 to produce a report (Wyre Forest District Car Park Options Summary Report) to evidence station car park capacity requirements in a quantitative modelling-led approach at existing Kidderminster and Blakedown railway stations and when considering a range of COVID-19 future growth reduction scenarios. SLC Rail is a specialist rail advisor that has supported WCC to develop and deliver its rail infrastructure programme since 2015 and previously produced the Worcestershire Rail Investment Strategy that was issued in 2017.
- 11.1.3 WCC states that the Wyre Forest District Car Park Options Summary Report supersedes its previous Local Plan evidence relating to proposed car park enhancement requirements at Kidderminster and Blakedown railway stations which forms a part of the evidence base for the local plan (IFT03). The rail passenger modelling approach undertaken in the study is said to be consistent with Department for Transport, Transport Analysis Guidance (TAG). Key findings of the report are summarised as follows:

Existing station car parking capacity and rail passenger services

 Kidderminster and Blakedown are the only two National Rail stations in Wyre Forest District; passengers from the District also use Stourbridge Junction, Hagley and Hartlebury stations, with wider strategic commuters using Birmingham International and Warwick Parkway.

- Kidderminster Station currently has 226 car parking spaces, and there are 11 spaces at Blakedown Station, to a total of 237. Prior to COVID-19 both car parks were used to capacity on weekdays.
- Kidderminster has a core service of 4 trains per hour (tph) to Birmingham, of which 2 tph are to Worcester, with some peak services to London Marylebone; Blakedown has 2 tph to Birmingham and Kidderminster, with some peak services to Worcester.

Current passenger demand and forecast growth (pre COVID-19)

- In 2018-2019 1.638m trips were made from Kidderminster Station, representing c. 2,550 return passengers per day, and 0.097m from Blakedown, c. 150 return passengers per day.
- Commuting from Kidderminster Station grew by 30% between 2001-2011, 35% in its inner urban catchment and 17% in its wider catchment (the Wyre Forest District to the north, west and south, covering Bewdley, Stourport and the A456/A4117 corridors) and became more dependent on car-based access.
- Passenger growth between 2019 and 2036 is estimated to be 22% at Kidderminster and 29% at Blakedown and would require an additional 98 spaces at Kidderminster and 12 at Blakedown. Addressing historic suppressed demand and future growth (without taking into account COVID-19 effects) would require a combined capacity for the District of 601 spaces, adding 364 spaces to the current total of 237.

Forecast passenger growth considering COVID-19 impact

- A range of COVID-19 impacts on future passenger demand were considered which ranged from a 5% reduction to a 30% reduction; for the purposes of their report SLC has used the 'worst-case' 30% reduction requiring lower growth of 255 spaces up to 2036, with 130 at Kidderminster and 125 at Blakedown. This was the base case minimum requirement adopted in the study. It assumes that the COVID-19 reduction demand is 'permanent' in the sense that it lasts in full throughout the whole plan period.
- Assessment of Local Plan spatial development and relative highway access times to both District stations from Kidderminster's further developed wider catchment indicates that c. 95 (42%) of Kidderminster's additional car-based users would divert to Blakedown.
- In turn the base case assumes growth by 2036 of 130 spaces at Kidderminster Station to a total of 356 (226 existing +130 additional), and 125 at Blakedown to a total of 136 (11 existing +125 additional) spaces, offering a combined capacity of 492 spaces. (Noting, values have been rounded to nearest whole number).

 Assessment of the highway network adjacent to Kidderminster Station suggests that, taken together with background growth in car use generated by the Local Plan up to 2036, an increase of 130 spaces will be within the capacity of the Comberton Road A448/station junction. Further car park growth beyond 130 spaces may exceed that highway capacity, and thus further junction modelling would be required.

Preferred site options to deliver future car park capacity requirement

- There are said to be two potential site options for provision of 130 new spaces at Kidderminster Station; Option K3 the construction of a single deck solution across a proportion of the existing at grade Severn Valley Railway car park; and Option K4B the construction of a multi storey deck across a proportion of the Kidderminster existing car park footprint. Estimated total costs of the two options would be £4.42 to £5.2m. A third option was also considered (Option K4A) which involved the construction of a single deck across the complete Kidderminster Station existing car park footprint that could deliver 107 new spaces (82% of the required capacity). The estimated total cost would equate to £2.9m.
- Provision of between 80 and 120 spaces at Blakedown Station is said to be feasible on the Callow Oils site (WRF/CB/2), adjacent to Station Drive/Lynwood Drive, approaching the base case requirement of 125 new spaces. Project development will require a formal traffic congestion study. An indicative layout for the site was produced comprising 111 spaces with a capital cost estimate of £1.6m.
- Even with the 'worst case' Covid impact the base case number of spaces indicated at Blakedown is 111, 14 spaces below the base case need of 125 spaces.
- The combined estimated cost of the parking provision at both Kidderminster and Blakedown which WCC have identified as priorities will leave little or nothing available for parking provision at other locations in the county unless additional funding is provided. There has been no reference to additional funding for the provision at Kidderminster, but at Blakedown the residential development on the 'Marmaris' site (WFR/CB/3) could make a contribution to the parking provision adjacent.

Report conclusions

 Development of the base case of 130 spaces at Kidderminster and 125 at Blakedown can meet the most cautious COVID-19 passenger demand growth forecast (30% reduction to pre-COVID demand),

- with prospective feasible sites available at both locations, offering an increase from the existing 237 spaces provided today to 492 by 2036.
- As well as incrementally supporting sustainable travel generated by Local Plan population and housing growth, this new capacity would reduce highway use by those who use other stations such as Stourbridge Junction, Birmingham International and Warwick Parkway thus aligning with Policy 13 of the Plan, and Section 9 of the National Planning Policy Framework 2019.
- If demand were to return to a pre-COVID 19 profile during the plan period additional parking would be required up to the 601-space forecast. This will continue to be monitored and reviewed. This point is echoed in the WCC explanation of the difference between the two SLC rail reports. Retention of future potential expansion locations within the Local Plan, would make provision for such further passenger growth.
- 11.1.4 Furthermore, in response to comments received from stakeholders during the Plan consultation process the feasibility of a suggested new station on the A456 between Kidderminster and Blakedown as an alternative to car park capacity expansion at the existing Wyre Forest District stations was reviewed in the report. It was concluded that a new station could be feasible in engineering terms, but at a quantum of capital cost c. £21m significantly beyond incremental solutions at the current two stations and Plan funding viability. The study therefore did not recommend promotion of such a scheme.
- 11.1.5 The report provides greater depth of information to explain and evidence the key findings summarised in the above response, including five technical appendices (A to E) produced by SLC Rail, SYSTRA and Jacobs. The five technical appendices cover topics as follows:

Appendix A Car Park Access and Capacity Report

Describes rail passenger modelling approach to derive current and future demand outputs for Kidderminster and Blakedown stations.

Appendix B Kidderminster Station Access Report

Describes traffic modelling approach to derive current and future capacity impact at Station Access to Comberton Road.

Appendix C Wyre Forest Rail Car Parks Engineering and Land Study

Identification of technical options and constraints to deliver capacity improvements at each of the Wyre Forest Station locations.

Appendix D Technical Note on Timetabling - suggested new station east of Kidderminster

Review capacity and potential service pattern for a new station located to the east of Kidderminster.

Appendix E Blakedown and Hartlebury Proposed Parking Improvements Vehicle Access and Level Crossing Overview

A desktop to the review the visibility at existing access junctions at Blakedown and Hartlebury against Highway Design Standards.

In light of the revised SLC Rail report and the WCC statement, the Council 11.1.6 acknowledges the revised analysis and assessment of impact on passenger demand due to the current pandemic. The Council notes though that the SLC Rail report has adopted a worst-case scenario Covid-19 impact and that even then the base case provision at Blakedown falls short of the worst-case requirement. The Council also notes that both SLC Rail and WCC recognise that if passenger numbers rise above the 30% reduction worst case (because the COVID-19 effect is not as great as predicted or does not persist throughout the plan period) then additional parking will be required; noting also the junction capacity concerns and the 42% passenger displacement from Kidderminster to Blakedown this need will be manifest at Blakedown. Consequently therefore the Council proposes to make provision now for future car park expansion by removing the 'Marmaris' site (WFR/CB/3) from the Green Belt, to be brought forward sequentially following the provision of the car park at the Callow Oils site (WFR/CB/2 - Station Yard) and if demands in the future justify the additional parking being required. A revised policy is proposed for site (WFR/CB/3 - Land off Station Drive) as follows:

Policy 36.6A Land off Station Drive, Blakedown (WFR/CB/3)

This land on the northern edge of Blakedown lies between the A456 and the railway line and is adjacent to Blakedown Station. It is proposed to safeguard part of the site for station car parking and develop the remainder for housing. The site has direct pedestrian access to both the station platform and the adjacent bus stop (A456 Birmingham Road).

Policy 36 WFR/CB/3 Land off Station Drive Blakedown

The parcel of Land is removed from the Green Belt and allocated for a mix of station car parking in part for residential development with the remainder safeguarded for future rail station parking.

- 1. Vehicular access to be taken from Station Drive.
- 2. The plantation woodland alongside the railway line will be retained and enhanced with additional planting where required.
- 3. Existing hedgerow along boundary with A456 to be retained and enhanced where required.
- 4. Pedestrian access onto station platform and A456 adjacent to bus shelter to be incorporated into scheme design.
- 5. Churchill and Blakedown Valleys Local Wildlife Site adjoining partially overlaps the site to the north. It will require buffering with embankment and woodland retained as open space. There is potential for SuDS and the creation of a mosaic of semi-natural marshland and wet woodland. Much of the Local Wildlife Site falls within Flood Zones 2 and 3.
- 6. Largeoak tree adjacent to entrance on Station Drive must be protected with its canopy kept free of lighting. The development should seek to retain and protect the mature trees on Station Drive frontage where possible. Where they can be retained, their canopies should be kept free of lighting for ecological reasons.
- 7.—Station parking to be provided mainly in the form of a half basement podium deck located along western boundary of site.
- 8. Potential adverse impacts on views from/of Harborough Hall to be mitigated for by additional planting alongside eastern boundary where required.
- 9. Housing to be provided in accordance with policies elsewhere in Local Plan and also to meet any local housing need shown in a Parish Housing Needs Survey.
- 10. <u>Car parking use to be brought forward sequentially</u> <u>following the provision of car parking on site WFR/CB/2 and only</u> if future demand justifies it.

Reasoned Justification

Development of this site would constitute a rounding off of the settlement of Blakedown and provide a strong and defensible Green Belt boundary using the stream, pools and woodland to the north and the A456 to the east. Blakedown is a well-served village and the site is in a highly sustainable location with easy access to local shops, primary school, sports facilities and regular train services to Hagley and Kidderminster for other services. This allocation will require an amendment to the settlement boundary with the site being removed from the Green Belt.

Housing development on the site would also help towards meeting future housing needs in Blakedown village. Although the northern end of the site falls within Flood Zones 2 and 3, this area will be left undeveloped as it is protected by its designation as a Local Wildlife Site. A detailed site-specific Flood Risk Assessment will be required at the planning stage to inform the developable area and ensure a safe and sustainable development. Opportunities to help improve flood storage and flood flow conveyance, linked to blue infrastructure enhancements, will be implemented where possible.

Additional car parking is needed at Blakedown railway station to meet the demand for car parking spaces for rail users on the commuter line to the Black Country and Birmingham as evidenced in the SLC Rail document. Housing development on the site would help to cover the costs of the car parking and would also help towards meeting the future housing needs in Blakedown village.

11.1.7 The site at Blakedown railway station (WFR/CB/3), which is allocated for housing and now proposed as being safeguarded for future car parking, will help to create a sustainable transport hub. Allocating land for a sufficient number of car parking spaces at the District's railway stations during the plan period and beyond is critical to the transport policies in the plan and the wider sustainability of Wyre Forest District. In 2019 Wyre Forest District Council declared a climate emergency following changes in Government legislation. Encouraging people to use public transport as an alternative to car use helps to tackle the climate change issues for the district.

Q11.1(ii) Are the Plan's provisions for transport and accessibility measures informed by adequate evidence of the needs of the District and the wider area?

- 11.1.8 WCC has worked with WFDC to identify the likely transport related infrastructure necessary to support the growth within the emerging WFLP. The assessment approach is set out in Wyre Forest District Council, Infrastructure Delivery Plan, June 2019, 3.1.10-3.1.11 (IFT01), which outlines the strategic transport procedure undertaken to evidence the impacts of the Plan and infrastructure requirements.
- 11.1.9 Government guidance is provided to assist local planning authorities in such assessments to accurately reflect strategic transport needs in local plan making. This is given under https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking. The approach taken by WCC fully accords with this guidance.

- 11.1.10 The allocations within the Wyre Forest Local Plan have been assessed using the Wyre Forest Transport Model, for the year 2036 coinciding with the Local Plan period. This is presented in the Wyre Forest Local Plan Review, Transport Evidence, June 2019 (IFT02). A top-down approach has been utilised which takes as its basis the combined effects of the entirety of the Plan, which is then refined through a process of detailed analyses which consider traffic impacts of individual options to demonstrate and quantify sustainability in greater detail.
- 11.1.11 The results of the WFTM modelling were used to analyse and assess the highway measures put forward within the Transport Section of the Wyre Forest Infrastructure Delivery Plan, June 2019 (IFT01). The Wyre Forest Infrastructure Delivery Plan has been developed specifically to address the issues that were identified by the traffic modelling.
- 11.1.12 The mitigation strategies described in this document are divided into 6 categories: Strategic Infrastructure; Hagley; Local Highway Schemes; Rail; Car Parking; and Bus and Community Transport. The Plan makes provision for both funding and the necessary implementation strategy as set out in the IDP June 2019 document.
- 11.1.13 The County Council is aware that the survey data for the base model is now 9 years old but have undertaken an analysis to ensure that this data remains representative of 2017 base year data. The justification for the use of this data is set out in full in Wyre Forest District Council, Infrastructure Development Plan, June 2019, 3.1.12 (IFT01).
- 11.1.14 Under normal circumstances, a base year re-validation exercise would have been undertaken using data from a more current traffic data collection exercise. However, the national challenges presented by the COVID-19 outbreak, and the consequential and significant changes to normal travel behaviour at this time would result in an invalid data collection exercise.
- 11.1.15 In order to move forward in this difficult scenario, the County Council have expeditiously and critically reviewed the baseline conditions utilising existing available local and national data sources to understand the nature and extent of changes that have occurred between the 2011 data point and the year 2017. The analysis has shown that 97% of count data in the AM and 88% of count data in the PM have not changed significantly between 2011 and 2017/18. This is set out in the Jacobs Data Suitability Report Wyre Forest Transport Model (December 2020).
- 11.1.16 With the assurance provided by the above analysis, the County Council is of the view that the WFTM model is evidenced to be the best available resource and tool, and critically that the conclusions and development infrastructure requirements arising from the use of this model to mitigate

- the highway impacts of the growth identified within the Plan, are sound. The IDP is a live document which is continually reviewed and refined as and when new information becomes available.
- 11.1.17 The strategic modelling exercise demonstrated the traffic impacts of the Plan development within the District and also the wider impacts further afield. This evidence is set out in the Wyre Forest Local Plan Review, Transport Evidence, June 2019 (IFT02).
- 11.1.18 Building on this strategic assessment, more detailed transport appraisal tools continue to be utilised to consider impacts of the Plan and allocations in greater levels of detail. For example, the A450 Corridor Enhancement Report, Jacobs, June 2019 (IFT04), considers highway improvement schemes to resolve existing and future congestion problems at several key junctions along the A450 corridor to the southeast of Kidderminster as identified within the IDP. The capacity benefits of several highway improvement options have been identified using forecast 2036 model flows obtained from the Wyre Forest Transport Model (WFTM).
- 11.1.19 The Hagley VISSUM Option Testing Report, Jacobs, December 2019, sets out the further analysis undertaken on the forecast demand on the A456 corridor to identify the effect of traffic growth that can be attributed to the proposed Wyre Forest Local Plan development sites within the District. The report shows the short, medium and long-term considerations. This work will continue to be advanced considering in detail the impacts of growth associated with the Plan.
- 11.1.20 In addition to these supporting technical documents, Kidderminster WNEP Modelling Phase 2 Report, tests in the following junctions (identified in the IDP):-
 - A451 Stourbridge Road W/A451 Stourbridge Road N/Broadwaters Drive/A449 Chester Road N(S) junction, for which a signalisation scheme is proposed.
 - A456 Birmingham Road (W)/A449 Chester Road N (N)/A456 Birmingham Road/ (E)/A449 Chester Road N (S) junction, a proposal banning the town centre bound right turn from A449 (N) to A456(W).
 - A448 Comberton Road (W)/A449 Chester Road N/A448 Comberton Road (E)/A449 ChesterRoad S, banning the outbound right turn from A449(S) to A448 (E).
- 11.1.21 Strategic infrastructure schemes aim to address any impacts upon areas outside of Wyre Forest, most notably within Wychavon and Bromsgrove.

 This will provide any necessary relief to key corridors within Kidderminster (A456, A451) and southern Hagley, as outlined in the Wyre

- Forest District Council, Infrastructure Developer Plan, June 2019, 3.1.20 (IFT01).
- 11.1.22 Local Highways Schemes are put forward specifically to provide highways mitigation, and fit within the wider framework of rail schemes, passenger transport schemes and active travel schemes in Kidderminster, Stourport on Severn and Bewdley. These highway schemes are described in the supporting documents listed above.
- 11.1.23 The Hagley Demand Report, January 2020, identifies the growth associated with the Local Plan will have little impact on the network with Bromsgrove District and therefore no schemes for the area are included within the IDP. However, highway works are being undertaken within Hagley to improve capacity. The Hagley Demand Report is provided in full in Appendix 6 of the Statement of Common Ground between Wyre Forest District Council, Worcestershire County Council and Bromsgrove District Council (ED8).
- 11.1.24 Looking beyond the parameters of highway mitigation, in line with national guidance promoting multi modal transportation policies, the Plan provision contains proposals for investment in walking, cycling and public transport as outlined in the Wyre Forest District Infrastructure Developer Plan, June 2019 (IFT01). The work undertaken for the first 600 dwellings at Lea Castle Village sets a high standard for the subsequent development of robust public transport strategies for the forthcoming allocations and developments within Wyre Forest. The Wyre Forest Local Plan makes provision of enhancement walking and cycling, notably reacting to areas that have currently been identified as having a degree of disconnect within the District. This is based upon the County Council's long established and detailed understanding of the network constraints, leading to key corridors being identified for upgrading to promote attractive direct walking and cycling links (these are set out in full in the Wyre Forest District Infrastructure Delivery Plan, June 2019, Appendix 1: Schedule of Infrastructure). Once more, based upon the track record of the County Council working with developers at Churchfields and Lea Castle Village, and considering the current engagement in detailed preapplication discussions with promotors, Mobility Strategies are now being developed which will contain the necessary measures required to maximise transport sustainability, accessibility, and Mobility as a service for the benefit of all, the plan makes provision for this Wyre Forest District Infrastructure Delivery Plan, June 2019, Appendix 1: Schedule of Infrastructure.

Q11.1(iii) Is there a reasonable prospect that the proposed measures and improvement schemes will be provided in a timely manner and will be effective?

11.1.25 Worcestershire County Council has several processes and procedures already in place to mobilise at speed and progress the proposed infrastructure capacity enhancement schemes at Blakedown and Kidderminster stations in a timely manner.

Committed funding in place with Wyre Forest District projects prioritised

WCC has £5m committed grant funding in place that has been ring-fenced specifically for the development and delivery of a county wide programme of railway station car park capacity enhancements. The proposed Kidderminster and Blakedown station enhancements have been identified as key priority targets for utilisation of the funding. WCC has demonstrated continued commitment to the Wyre Forest District rail schemes by utilising a proportion of funding to commission a report in 2020 to consider the impact of COVID-19 pandemic on future passenger demand and capacity requirements and provide up to date evidence to support the Plan (refer to Wyre Forest District Car Park Options Summary Report).

• Blakedown land acquisition primed for early completion

During 2020, WCC advises that it has successfully negotiated and executed an Options Agreement with the landowner of the Callow Oils site (WFR/CB/2). Subsequent to adoption of the Local Plan, WCC can proceed at speed to conclude a set list of Conditions Precedent items and then acquire the land title. WCC has confirmed it will utilise its specialist rail advisor framework consultant to progress procurement and management of detailed design and delivery activities.

Established internal governance and management systems

WCC has a dedicated infrastructure management team with wellestablished processes and procedure in place and has a Responsible Officer with delegated authority to manage and deliver infrastructure projects set out in local policy and plans. The WCC team has demonstrated its competence and expertise to successfully develop and deliver transport infrastructure in the region of a similar nature and complexity to the car park capacity improvements proposed at Kidderminster and Blakedown railway stations.

Recent experience promoting and delivering complex railway infrastructure projects

WCC has shown its capability and competence in delivering complex rail infrastructure as demonstrated by the successful development and delivery of Worcestershire Parkway Station that entered service in February 2020. This involved the acquisition of land, structuring of rail property contracts, procurement of design and delivery activities in compliance with Railway standards and guidelines. This is highly relevant experience that will be utilised for the Kidderminster and Blakedown station enhancement projects.

Specialist rail advisory framework already in place

WCC has already procured a specialist rail advisor (SLC Rail) through a framework contract executed in 2020, and thus has a competent professional advisor team primed to manage the development and delivery of the proposed infrastructure capacity enhancement projects at Kidderminster and Blakedown railway stations. SLC Rail has a "Project Access" team primed and ready to be mobilised to manage the development and delivery of capacity infrastructure improvements across the region. As soon as the Local Plan is adopted WCC will commission SLC Rail to proceed with project management activities.

Quantitative modelling-based approach to evidence requirement and prioritise effective infrastructure investment

The passenger demand modelling work undertaken has clarified that if capacity is unlocked at Blakedown, between 36% and 50% (average of 42%) of station users located within the Kidderminster catchment would choose to use Blakedown rather than Kidderminster. This data and quantitative modelling-led approach allows the efficient sizing of infrastructure capacity enhancements to meet the holistic future growth needs for the Wyre Forest District in an effective manner.

Q11.2 Bearing in mind the modifications suggested by the Council, are the provisions and requirements of Policy 24A on telecommunications and broadband development justified, effective and consistent with national planning policy?

11.2.1 Policy 24A was rewritten following advice from Worcestershire County Council, it is based on effective joint working and forms part of the Statement of Common Ground with Worcestershire County Council (SD10a). This was to ensure that the details contained in Policy 24A and the reasoned justification was compliant with national policy and updates on the government's latest position making it as up to date as possible.

- Policy 24A is believed to be is effective and justified it takes into account up to date information following Government Guidance.
- 11.2.2 The main modifications are in compliance with the NPPF 2019 (paragraph 112) which recognises the role of advanced, high quality, reliable communications infrastructure in creating sustainable economic growth as part of strategic policies. The development of high speed broadband technology and other communications networks will also play a vital role in enhancing the provision of local community facilities and services. New development within the District will be expected to enable broadband services for occupiers of all new residential development within the District and expected to consult with telecommunication providers to explore the need for other telecommunications technology.

Q11.3(i) Is Policy 24B on renewable and low carbon energy justified, effective and consistent with national planning policy?

11.3.1 Renewable and low carbon energy legislation has been regularly updated. When Policy 24B was prepared for the 2018 Pre-Submission consultation the information was believed to be consistent with national planning policy, based on evidence and deliverable over the plan period. Since then updated legislation mean that it is considered that the policy should be updated and include additional explanation and an updated reasoned justification. An updated version has been prepared and is shown below. On 18th November 2020 a Policy Paper The Ten Point Plan for a Green Industrial Revolution was published which demonstrates the UK's significant and continuing commitment to tackling greenhouse gas emissions, supporting offshore wind farms and by 2030 ending the sale of new petrol and diesel cars and vans. This topic may be subject to further changes in legislation and therefore this policy may require further amendments and updates to ensure that it is consistent with national policy.

Policy 24B

- 11.3.2 It is proposed to include the following paragraphs 11.3.2 11.3.8 to the plan before the revised policy and reasoned justification below.
- 11.3.3 Wyre Forest District Council declared a climate emergency in 2019. A climate emergency requires prompt action. Climate change is caused by the emission of carbon dioxide and other greenhouse gases and has been a consistent trend since the Industrial Revolution. However, it has been realised that this is likely to cause catastrophic and probably irreversible climate change.

- 11.3.4 The types and amounts of fuel we use to generate energy determine the amount of carbon emissions released into the atmosphere, which in turn impacts on climate change. Heat and power provision from fossil fuels such as coal and gas contribute significantly to our overall carbon emissions. This can be reduced by generating energy from renewable sources through use of systems such as solar panels and air and ground source heating. Whilst clean energy technology and markets continue to develop, new development in the near term will still rely upon fossil fuel generated heat and power to some extent. Whatever source of fuel is used, it is important economically, as well as environmentally, to use energy generated as efficiently as possible.
- 11.3.5 Our climate is changing and will continue to do so for the foreseeable future due to carbon emissions already emitted and locked into our climate systems. However, the more that is done to reduce carbon emissions, the less extreme the impacts are likely to be. Worcestershire's climate has changed over the last century, with changes including an increase in average annual temperature and with winters becoming wetter relative to summers. Predictions for our future climate include increasing temperatures and changes to precipitation patterns also an increase in extreme weather events such as heatwaves and flooding. The potential impacts of climate change are far reaching, and it is vital that new development considers the impacts and includes measures to adapt accordingly. Climate impacts must be considered in development of the built environment, including buildings, roads, drains and utilities, which are designed for the long-term of 50 to 60 years or even longer. Structures designed now will need to cope with the climate of the 2070s at least and development built to withstand the likely impacts of climate change.
- 11.3.6 Due to the amount of Carbon Dioxide (CO₂) in the atmosphere there will be some degree of climate change, however the more that we can do to reduce emissions the less severe the impact. Following adoption of the Wyre Forest District Local Plan the Council intend to further expand the topic in a Climate Change and Renewable Energy Supplementary Planning Document (SPD). The SPD will set out specific requirements relating to climate change and renewable energy within the District up to 2036.
- 11.3.7 Wyre Forest District Council's Corporate Plan's (2019-2023) includes a 'Safe, Green and Clean Living Environment' as one of its three priorities. It includes a strategic action to work with

- partners to protect our environment, to address air quality issues and to help tackle climate change.
- 11.3.8 The NPPF (paragraph 148) states that "The planning system should support the transition to a low carbon future in a changing climate and support renewable and low carbon energy and associated infrastructure".
- 11.3.9 Wyre Forest District Council recognises that the climate change emergency requires councils to take positive action. For example, the District currently has a very low level of provision of charging points for electric vehicles. The Council has resolved to ensure that adequate electric vehicle charging points are provided in Council-owned public car parks, privately owned car parks are encouraged to do likewise and electric vehicle charging points should be provided on all future residential, employment and commercial developments where vehicle access is provided. The Wyre Forest Climate Change Action plan sets out actions on energy efficiency and renewable energy, reducing single use plastics and tree planting.

Policy 24B - Renewable and Low Carbon Energy General

 All new developments, and where possible redevelopment of existing buildings, should consider location, design, siting and orientation to maximise the use of natural heat and light and the potential for renewable energy microgeneration. Where possible, in appropriate locations, solar panels should be fitted. All new <u>residential</u>, <u>employment or commercial</u> developments should include electric vehicle charging points.

Incorporating Renewable and Low Carbon Energy into New Development

- To reduce carbon emissions and secure sustainable energy solutions, all new developments over 100 square metres gross, or one or more dwellings, should incorporate the energy from renewable or low carbon sources equivalent to at least 10% of predicted energy requirements, unless it has been demonstrated that this would make development unviable. Applications will be required to include an Energy Assessment demonstrating how these requirements will be met. New sites should be built to the highest standards of energy efficiency subject to the viability of the development. Where renewables are not installed for reasons such as viability, consideration must be given to allow provide renewable technology at the earliest opportunity a later date.
- Large scale (¹) development proposals should, where possible install examine the potential for a decentralised energy and heating network. If it is

practical and viable **to do so** the, a decentralised energy and heating network should be provided as part of the development. If a district heat network already exists new development should connect to this network unless satisfactory evidence is provided to demonstrate that this is not viable or practicable.

Renewable energy installations that harm the significance of heritage assets
or have a detrimental impact on the landscape or historic environment,
conflicting with any other policies contained in this Plan will not be supported
unless the requirements of the NPPF are satisfied.

Stand Alone Renewable and Low Carbon Energy Schemes

 With the exception of wind turbines (see below), proposals for stand-alone renewable and other low carbon energy schemes are welcomed and will be considered favourably having regard to the provisions of other relevant policies in the Plan, providing that appropriate consultation has taken place with the local community and the appropriate Town or Parish Council. Where possible, community shares in renewable energy schemes which offer members of the community investment into local energy schemes should be considered.

Proposals for stand-alone wind turbines will only be considered favourably if:

• It is in an area considered suitable for wind energy development; and, following consultation, it can be demonstrated that the planning impacts identified by the affected community have been fully addressed.

¹ For the purposes of this policy only (Policy 24B Renewable and Low Carbon Energy) the definition of large scale development is residential developments of 100 or more dwellings or non-residential developments of more than 10,000 square metres.

Reasoned Justification

- 11.3.10 The Council support the transition to a low carbon future in a changing climate. It supports ways that contribute to radical reductions in greenhouse gas emissions, re-use of existing resources, low carbon energy and associated infrastructure in conformity with NPPF paragraph 148.
- 11.3.11 Energy infrastructure is also recognised in Policy 12 Strategic Infrastructure, and the Wyre Forest Infrastructure Delivery Plan (IDP).
- 11.3.12 The EU's Renewable Energy Directive set an overall target for 20% of the energy consumed in the European Union to come from renewable sources by 2020, with a UK target of 15% by 2020.

- 11.3.13 In December 2018 the directive was revised in which it established a new binding renewable energy target for the EU for 2030 of at least 32%. All EU countries must also ensure that at least 10% of their transport fuels come from renewable sources by 2020.
- 11.3.14 The new directive establishes a new binding renewable energy target for the EU for 2030 of at least 32%; this figure may be revised upwards by 2023.
- 11.3.15 National government policy is to end the sale of new conventional petrol and diesel cars and vans by 2030, this Local Plan runs to 2036, therefore the Council needs to ensure that residents, workers and visitors to the District have access to vehicle charging points as they move to alternative fuelled vehicles such as hybrid, plug in electric or other fuels such as hydrogen Year on year the number of electric vehicle registrations are increasing. Between July 2017 and July 2018 there was an increase in plug in electric cars of 35%. In November 2019 more than 1 in 10 new vehicles on the road are alternatively fuelled vehicles either hybrid, plug in hybrid (PHEV) or pure electric or mild hybrid electric. At the end of September 2020 pure electric vehicles accounted for 6.7% of new car registrations, however, when PHEV's are added the figure rises to 10.5% (Data from the Society of Motor Manufactures and Traders (SMMT)).
- 11.3.16 The Climate Change Act 2008 (2050 Target Amendment) Order 2019 sets out how the UK will tackle and respond to climate change. The Act sets a legal requirement for the UK to achieve an 80% cut in Carbon Dioxide emissions from 1990 levels by be zero carbon by 2050, with a series of five year carbon budgets, including a 37% cut by 2020 and 51% by 2025. In 2018 the UK was 44% below 1990 levels; this means that both the first and second carbon budgets were met. At the present time the third budget is likely to be met but the UK is not on track to meet the fourth budget (2023 to 2027).
- 11.3.17 The UK government also ratified the Paris Agreement on Climate Change in November 2016. The Paris Agreement provides a framework for governments as well as business and investors to keep global warming well below 2°C, pursuing efforts to limit the temperature increase to 1.5°C. In October 2018 a report by the Intergovernmental panel on Climate Change (IPCC) which is the UN body for assessing the science related to climate change. The report highlighted the differing impacts between limiting global warming to 1.5°C compared with 2°C. If limited to 1.5°C the **likelihood** of an Arctic Ocean free of sea ice in summer would be once per century and coral reefs would decline by 70 to 90 percent. If the rise was by 2°C the **likelihood** of an Arctic 11.3.17 Ocean

- free of sea ice in summer would be at least once per decade and coral reefs would virtually all be lost.
- 11.3.18 The Government's Clean Growth Strategy sets out a comprehensive set of policies and proposals that aim to accelerate the pace of "clean growth", i.e. deliver increased economic growth and decreased emissions. Clean growth means growing our national income while cutting greenhouse gas emissions. Since 1990, UK emissions have fallen whilst the economy has grown. In order to meet future carbon budgets, government recognises the need to drive a significant acceleration in the pace of decarbonisation.
- 11.3.19 The Government has pledged to introduce a Future Homes Standard which will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency; it will be introduced by 2025. The Building Regulations are to be updated in order to implement this, along with interim increases in energy efficiency requirements. New requirements for the inclusion of electric charge points in new residential and commercial developments are also due to be introduced through the Building Regulations.
- 11.3.20 The Worcestershire Local Enterprise Partnership's Energy Strategy 2019-2030 aims to reduce carbon emissions by 50% from 2005 levels by 2030, to double the size of the low carbon sector by 2030 and triple energy production from renewable generation by 2030. The strategy has been produced to help identify the opportunities and challenges that Worcestershire faces in its movement towards a low-carbon, low emission economy and sets out an overarching energy vision for Worcestershire.
- 11.3.21 Worcestershire County Council's 'Assessment of the capacity for large-scale renewable energy in Worcestershire' was commissioned in 2008 to determine the potential capacity for larger-scale renewable energy generation in Worcestershire. It was concluded that a suggested realistic target of 3.5% of energy consumption from renewables could be achieved by 2026 across Worcestershire. This relates only to large scale biomass, wind and hydro power schemes and excludes micro generation schemes, such as solar.
- 11.3.22 Heat networks (district heating schemes) supply heat from a central source directly to homes and businesses through a network of pipes, so that individual homes and business do not need to generate their own heat on site, helping to reduce carbon emissions through energy efficiency. The UK government has ambitious plans for heat networks in the UK. Initial results from modelling by the Department for Business

Energy and Industrial Strategy indicated that up to 20% of UK domestic heat demand might be served by heat networks by 2030. Government set up a Heat Network Delivery Unit (HNDU) to assist local authorities address capacity and capability challenges identified as barriers to heat network deployment in the UK. The Worcestershire LEP obtained HNDU funding and commissioned a heat demand mapping and energy master-planning study. Two potential district heat networks were identified in the Kidderminster area; the viability of these could be significantly improved by the inclusion of future and planned developments.

11.3.23 To be considered acceptable it is necessary for proposals for stand-alone wind turbines to demonstrate local support either through a Neighbourhood Plan or through other methods to secure local backing.

Q11.3(ii) have areas within the District that may be suitable for wind energy development been explored by the Council?

- 11.3.24 Areas within the District have not been explored by the Council for wind energy development in the Submission Plan.
- 11.3.25 Previously in 2008 Worcestershire County Council undertook a renewable energy study for the County. It found that in comparison with the rest of the United Kingdom Worcestershire was not a prime county for wind energy. This is due to the fact that there are limited areas for good mean annual wind speeds and population is relatively dispersed. A site search was undertaken which considered constraints such as wind speeds, access, topography and classification of land.
- 11.3.26 Worcestershire County Council discussed Renewable Energy at the Economy, Environment and Communities Scrutiny and Overview Panel January 2015. The conclusion for Wind Power was that "Insufficient windspeed in the County meant that projects would only be viable on sensitive sites and would be politically contentious in places such as Fish Hill (Broadway), Waseley Hills and the Malvern Hills, an Area of Outstanding National Beauty (AONB). There were planning complications on Green Belt land in the north of the County where any decisions would need to be referred to the Secretary of State and some suitable areas were of high quality agricultural land". Many of these areas are not within Wyre Forest District and wind power within the District has not been further explored.

Q11.4 Does Policy 18A and the supporting text on financial viability require modification to better reflect the approach in the national Planning Practice Guidance and take account of caselaw?

11.4.1 It is proposed that Policy 18a, Financial Viability, is rewritten to reflect the updated Planning Practice Guidance. The wording of that policy is set out below:

All the allocated sites within the Local Plan have been assessed using the typology methodology set out in Paragraph 004 of the Planning Practice Guidance. Where applications depart from the assumptions made in the Local Plan Viability Assessment, May 2017 (IFT07), the Local Plan Viability Assessment Update, October 2018 (IFT06) and the Pre-Submissions Viability Note (IFT05), the applicant will be expected to justify the need for a viability assessment.

- i. If it is agreed that a viability assessment is required then it is for the applicant to demonstrate how the assumptions made in plan assessments have changed. Any evidence to substantiate any claims should also be provided. Details of acceptable evidence can be found in the Supplementary Planning Document on Planning Obligations.
- ii. Where the District Council considers it necessary to obtain independent advice to validate a viability assessment which has been submitted, the applicant will be required to meet all reasonable costs of doing so.
- iii. The viability assessment should be presented on either a residual value or profit basis which should be agreed with the District Council in advance.
- iv. For transparency, information in the viability assessment, if relevant to the decision, should be available to anyone who wishes to challenge the decision.

Q11.5 Does the proposed monitoring framework set out in document SD11 provide an adequate range of indicators? Should targets be added to the monitoring framework as appropriate?

11.5.1 The proposed monitoring framework for the Wyre Forest Local Plan as set out in the Table of Additional (minor) Modifications (SD11), is taken from the Sustainability Appraisal document (SD04, Table 8.1, p57). Government guidance advises that existing monitoring arrangements should be used where possible in order to avoid duplication. WFDC produce an annual Authority Monitoring Report (AMR) as required by regulation 34 of the Town and Country Planning (Local Planning)

- (England) Regulations 2012), and will continue to do so post adoption of the new Local Plan.
- 11.5.2 Having reflected on Q11.5 it is considered that further amendments are required to the proposed monitoring framework. The table below is a proposed additional modification to the monitoring framework for the Wyre Forest Local Plan. Having carried out a review of recent Local Plans that have been adopted by Local Planning Authorities the Local Plan Objectives are to be used as the basis of the Monitoring Framework. The plan objectives are taken from Table 3.0.2 within the Local Plan (SD01 page 20). Where applicable, the same indicators have been used from the current proposed monitoring framework as set out in the Sustainability Appraisal Document (SD04) as they had been considered to be an adequate range of indicators.
- 11.5.3 The Council proposes to include additional columns on targets and delivery mechanism for the objectives. This will assist with the annual monitoring to review the Local Plan to check if it is achieving its overarching objectives. If the monitoring reveals that the plan objectives are not being met, the Council may need to take remedial action including a partial or whole review of the Local Plan.

Plan Objectives	Indicator	Target	Delivery Mechanism
1) To encourage the long term sustainable development of Wyre Forest and its communities.	Development that meets sustainable development as outlined in paragraphs 7-14 of the NPPF	Adhere to Policy 5A for development proposals Meet the requirements of table 6.0.1 over plan period to meet social and economic objectives to build a strong, responsive and competitive economy. Adhere to Policy 8B Affordable Housing provision to support strong, vibrant and healthy communities.	Site allocations Development Management Process

Plan Objectives	Indicator	Target	Delivery Mechanism
2) To address the key challenges facing the District especially in terms of housing, employment, health and transport.	 Housing approvals, completions and losses Total number of jobs Health dimension of the Index of Multiple Deprivation Vehicle km on main roads Air Quality Management Areas (AQMA) Mode of Travel to work 	Adhere to policy 14 Green Infrastructure to make the effective use of land and improve biodiversity. Adhere to Policy 6A of annualised housing targets of 276 homes and 90 affordable units per annum and 29 ha of employment land over plan period development to commence as specified in Policies 30-36. Adhere to Policy 10A for employment land allocations Adhere to Policy 9 for health and well being matters Adhere to Policy 16A to avoid significant adverse impacts on AQMA Adhere to Policy 13 for transport and accessibility matters Annual completion of Monitoring Report	Site allocations Development Management Process Building Regulations

Plan Objectives	Indicator	Target	Delivery Mechanism
2) To a library		Refer to the Infrastructure Delivery Plan	C'h a lla a tiana
3) To address housing needs in order that existing and future residents' requirements are met and the economic development of the area is supported.	 Housing approvals, completions and losses Amount and percentage of affordable housing 	Achieve standards as set out in Policy 6A of 276 homes and 90 affordable units per annum over plan period development to commence as specified in policies 30-36. Annual completion of Five Year Housing Land Supply Report	Development Management Process
4) To recognise the changing nature of employment, encourage economic diversifications and make sufficient high quality employment sites available.	 Total number of jobs Proportion of working-age residents in employment Amount of employment land available, by type and location 	Adhere to Policy 10A in regards to a diverse local economy and to deliver 29ha of employment land in the plan period. Annual completion of Monitoring Report	Site allocations Development Management Process
5) To maximise the use of previously developed land in order to ensure the best use is made of available land both within and beyond the main towns.	 Percentage of new dwelling completions on previously developed land Percentage of available employment land on previously developed land 	Annual completion of Five Year Housing Land Supply Report Annual completion of Monitoring Report	Site allocations Development Management Process

Plan Objectives	Indicator	Target	Delivery Mechanism
6) To protect and support the role of Green Belt through a strategic review and to identify limited strategic Green Belt release to enable the delivery of the plan whilst reinforcing the role and integrity of the Green Belt for future plan	Hectarage of development in the Green Belt.	Achieve standards as set out in Policy 7A Strategic Green Belt Review Refer to Strategic Green Belt Review document	Site allocations Development Management Process
periods. 7) To maximise opportunities for the inclusion of green infrastructure into high quality development in order to provide a good quality of life and maximise the benefits of walking and cycling. Safeguard and enhance the District biodiversity and geodiversity	 Change in areas of biodiversity importance Condition of SSSI Amount of new green infrastructure completed (hectares) 	Adhere to Policy 7A for the Strategic Green Belt Review Adhere to Policy 11D for protecting and enhancing biodiversity Achieve 40% Green Infrastructure standard for Greenfield sites exceeding 1ha as set out in Policy 14.	Developer and other funding contributions Development Management Process Natural England
assets. 8) To promote the historic environment and landscape and conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life	 Number of heritage assets at risk Number of heritage assets removed from the HAR registers 	Adhere to Policy 11B Historic Environment Refer to Local Plan Heritage Impact Assessment	Development Management Process Historic England Local Heritage List

Plan Objectives	Indicator	Target	Delivery Mechanism
of this and future generations.			
9) To increase provision and to facilitate greater access to sport, recreational and other community facilities in order to encourage healthier lifestyles and improve the health and wellbeing of the District's population.	 Number of playing pitch and indoor built facilities completed Amount of active sports participation and recreational use Change in Health dimension of the Index of Multiple 	Adhere on Policies 20A-20C in regards to open space, playing pitch and outdoor community uses in housing development. Refer to the Infrastructure Delivery Plan and Playing Pitch Strategy	Developer and other funding contributions Development Management Process
10) To improve connectivity within the District and achieve more sustainable travel patterns and reduce the need to use the private car through improved public transport (bus and rail), and new and enhanced cycle ways and footpaths.	 Traffic counts (motor vehicles and cyclists) Length of new cycle/footpath completed (km) Number of additional parking spaces provided at railway stations 	Compliance with traffic generation targets as agreed through the planning application. Adhere to Policy 13 Transport and Accessibility in managing travel demand and providing alternative modes of transport Refer to Infrastructure Delivery Plan Completion of site allocations as set out in Policy 36.6 and Policy 36.6A in plan period.	Developer and other funding contributions Development Management Process

Plan Objectives	Indicator	Target	Delivery Mechanism
		Achieve standards as set out in Policy 31.2 for Lea Castle Village of provision of pedestrian and cycle links both within and off the site (where deliverable).	
		Achieve standards as et out in Policy 32.4 for Kidderminster Eastern Extension to provide pedestrian and cycle links from the site to connect with existing development on Comberton Estate (through Borrington Park) and Offmore Estate (via Offmore Farm Close) and on through to the rail station and town centre.	
11) To protect the District's water supply and quality, and reduce the risk of flooding.	 Net number of dwellings completed which meet water efficiency standards Development steered to areas with the lowest probability of flooding. 	Adhere to Policy 15A Water Conservation and Efficiency with water efficiency standards of 110 litres per person per day. Adhere to Policy 15C Flood Risk Management	Development Management Process

Plan Objectives	Indicator	Target	Delivery Mechanism
		and refer to Strategic Flood Assessment.	
		Monitor number of objections from the Environment Agency to planning applications, as part of the Authority Monitoring	
		Monitoring Report.	

Q11.6 Is the classification of strategic policies set out in Annex 1 of document SD11 consistent with national planning policy's advice about the nature of strategic policies (NPPF 2019, paragraph 21)?

11.6.1 The list of strategic policies are set out in Annex 1 of the Table of Additional (Minor) Modifications (SD11). The NPPF (para 21) requires Local Plans to make explicit which policies are strategic policies.

Part A of the Local Plan is the strategic element of the document. This section of the plan contains strategic policies from 5A through to Policy 16C.

Part B of the Local Plan are non-strategic policies and form the development management section.

Part C of the Local Plan is the site allocation policies which are nonstrategic.

- 11.6.2 The policies were reviewed by planning policy officers in accordance with paragraph 21 of the National Planning Policy Framework (NPPF). The table in Annex 1 of document SD11 sets out explicitly the strategic policies of the Wyre Forest Local Plan. They are in accordance with the NPPF in that these policies are limited to the strategic priorities of the area and provide a clear starting point for any non-strategic policies that are needed. They look ahead over a minimum 15 year time period from adoption, anticipating and responding to long-term requirements and opportunities.
- 11.6.3 The strategic policies meet at least one of the four criteria defining strategic policies as shown in paragraph 20 of the NPPF, in that strategic

- policies should set out an overall strategy for the pattern, scale, and quality development for-
- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- 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);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 11.6.4 Part A of the Local Plan contain strategic policies. However after reviewing the NPPF it was felt that the policies contained in Chapter 24 which comprise Policy 24A Telecommunications and Broadband and Policy 24B Renewable and Low Carbon Energy which are currently in section B the Local Plan are also strategic policies. They therefore should have been included in Part A of the Local Plan as these polices meet at least one of the criteria listed in paragraph 20 of the NPPF that define strategic policies. It was also felt that the key strategic sites in Part C Site Allocations such as Lea Castle Village and the Eastern Extension, should be included as strategic policies.