

**Response of BDC to consultations on Wyre Forest
Local Plan Review Preferred Option and Draft
Worcestershire Rail Investment Strategy**

Relevant Portfolio Holder	Councillor Kit Taylor
Portfolio Holder Consulted	Yes
Relevant Head of Service	Ruth Bamford
Wards Affected	All Wards
Ward Councillor Consulted	Yes
Non-Key Decision	Yes

1. SUMMARY OF PROPOSALS

- 1.1 Wyre Forest District Council (WFDC) have been consulting on the Wyre Forest Local Plan Review Preferred Option (WFPO), consultation on this plan and its supporting evidence took place between 14th June and the 14th August.
- 1.2 Worcestershire County Council (WCC), as the Local Transport Authority, has produced a Worcestershire Draft Rail Investment Strategy (WDRIS). Consultation on the proposals took place in late July and early August over recent weeks. The consultation closed on 11th August 2017.
- 1.3 The appendices A and B are the informal officer responses submitted to both consultations, due to the scheduling of meetings it has not been possible to have these responses considered by members in advance of the deadline for comments. These consultations are both non statutory, and should further responses need to be submitted it should be possible to do this through the ongoing engagement the Council has with both WFDC and WCC.

2. RECOMMENDATION

- 2.1 That Members note the contents of the report.
- 2.2 That Cabinet recommends to Council that the draft officer response to Wyre Forest Local Plan Review Preferred Option (as attached at Appendix A) be approved by Council, and submitted to Wyre Forest District Council as the formal consultation response.
- 2.3 That Cabinet recommends to Council that the draft officer response to Worcestershire Draft Rail Investment Strategy (as attached at Appendix B) be approved by Council, and submitted to Worcestershire County Council as the formal consultation response.

3. KEY ISSUES

Financial Implications

- 3.1 There are no direct financial implications associated with this report.

Legal Implications

- 3.2 WFDC is carrying out the consultation in accordance with Regulation 18 of the Town & Country Planning (Local Planning) (England) Regulations 2012. It is important that the Bromsgrove District Council engages at the appropriate stages in planning process, although previous responses and discussions have taken place at officer level with WFDC, this is the first substantive opportunity to respond to the proposals.
- 3.3 There are no legal implications associated with the WDRIS response, although the strategy is being developed to support the Worcestershire Local Transport Plan 4. Worcestershire County Council, as the Local Transport Authority, is legally required to produce, deliver and maintain a Local Transport Plan under the Transport Act (2000) and the Local Transport Act (2008).

Service / Operational Implications

Summary of Response - Wyre Forest Plan Review Preferred Option

- 3.4 The WFPO is the first full draft of the planning strategy for the Wyre Forest District up to 2034, this plan once adopted will replace the extant Wyre Forest Local plan which was adopted in 2013. The plan has much in common with many local plans and is split up as follows; Part A context and Strategic policies, Part B development Management Policies and Part C Proposed allocations. It is Part A and to a lesser extent Part C which present possible concerns for BDC.
- 3.5 Within Part A the plan identifies a housing requirement of 5400 dwellings, 540 care home beds and 40 hectares of employment land. The levels of development being identified are not something to dispute. It is the location of this development which could give rise to concern if further information and evidence is not provided.
- 3.6 The preferred option presented in this plan, does in fact have some options within the preferred option, specifically in relation to future housing sites. Some of these sites are locations that are being proposed to be removed from the green belt. There are a number of sites being proposed which are presented as core sites, and which

appear in all options. There are then two options, Option A and Option B, of which one would be developed alongside the core sites. These two options have different sites contained within them, which would result in a different spatial distribution of development depending on which one is implemented. The one consistent feature of both the core sites and the options, is that the focus for development is predominantly to the east of Kidderminster, and adjacent to transport routes that flow towards Bromsgrove.

- 3.7 As members are aware from recent discussions infrastructure and particularly transport infrastructure is a key issue going forward, this is a feature which is not just local to Bromsgrove. For any plan to be successful understanding the impacts of development on existing infrastructure, and then providing new additional infrastructure is key. This is where the major concern with the WFPO presents itself at the moment. Some very early stage assessment work has been undertaken to attempt establish the transport infrastructure required. No detailed assessment or modelling has been undertaken to fully understand the implications of the locations chosen for development. The modelling and other transport related evidence should have ideally been more developed at this point. This would mean it would play a bigger role in determining the options, and not as is being proposed in this instance to be developed once the preferred option is chosen.
- 3.8 The full representation in relation to the transport evidence is contained in the response at appendix A. The implication of this is that, at this stage and until more is known about the transport implications of the proposed options, BDC cannot express any preference for option A or B, and further to that unfortunately cannot even support the core sites chosen by WFDC. It is envisaged that as WFDC begin to respond to the comments received on the WFPO, discussions will take place as to the requirements for the transport evidence base, and work will begin to address the issues highlighted in BDCs response.

Summary of Response - Draft Worcestershire Rail Investment Strategy

- 3.9 The Draft Worcestershire Rail investment Strategy has been published by WCC, the focus of the strategy is the existing and some proposed new rail infrastructure across the County. It is envisaged that the strategy will help support LPT4 and also be used to lobby for rail investment up to 2043. The WDRIS is split up into 5 stages as follows.

Stage 1 – Current Travel Markets, Train Services & Accessibility
Stage 2 – Review of Worcestershire’s Development Proposals
Stage 3 – Rail Industry Plans & Gap Analysis
Stage 4 – Economic Testing Of Connectivity Options
Stage 5 – The Prioritised Conditional Outputs
Stage 6 – Making It Happen

- 3.10 The strategy itself goes into great detail on the current position of the rail infrastructure across the county, and also the factors which will influence investment going forward. Much of the analysis and discussion understandably is very rail industry centric. Of the 6 stages it is stage 5 where the outputs of the strategy are presented. These outputs are far reaching and appear to be ambitious, which is to be welcomed. The outputs are a mixture of the providing additional services on existing lines calling at more places across the County, and physical infrastructure improvements such as the electrification of lines and new parking facilities.
- 3.11 The full officer response can be seen at appendix B, whilst there is much to support and commend about the WDRIS, the key issues remains as per previous responses submitted by BDC on LTP4, the lack of an overall strategy for transport. There are no complimentary strategies for other forms of transport investment, meaning it is difficult to see how / if the improvements being identified in this strategy will maximise the potential of the whole transport network. It is also unclear how this strategy has and in future can directly respond to the development that is allocated in development plans drawn up at district level. Whilst the strategy does acknowledge that there is currently, and will be in future land released for development. It is difficult to see how these decisions about land releases have currently and will in future affect the quantum of where rail investment takes place.
- 3.12 As with the comments in previous reports on LTP4 and also those contained in this report on the WFPO, the response expresses the need for a comprehensive transport strategy to be developed. This strategy should then help inform land use decisions, and also be used to secure the funding needed for the right investment to take place, at the right time across all forms of transport.

Customer / Equalities and Diversity Implications

- 3.13 There are no Customer / Equalities and Diversity Implications associated with this report.

4. RISK MANAGEMENT

- 4.1 The risks associated with not responding to these consultations is that BDCs views will not be taken into account by WFDC and WCC. Specifically in relation to the WFPO, if further responses and attendance at future examinations are required, it is essential that the Council's views are expressed as clearly and early as possible.

5. APPENDICES

Appendix A – BDC response to WFPO
Appendix B – BDC response to the WDRIS

6. BACKGROUND PAPERS

- WFPO Document
- WFPO Infrastructure Delivery Plan

- Worcestershire Draft Rail Investment Strategy

7. KEY

WFDC - Wyre Forest District Council
WFPO - Wyre Forest Plan Review preferred Option

WCC - Worcestershire County Council
WDRIS - Worcestershire Draft Rail Investment Strategy
LTP4 - Local Transport Plan 4

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