

Bromsgrove District Council Response to Wyre Forest Local Plan Review Preferred option - August 2017

1 Thank you for the opportunity to comment on the Wyre Forest Local Plan Review Preferred option, the below comments at this stage represents an officer response. Due to the timescales for consultation, there have not been any appropriate Council meetings for this response to be considered formally. This process will take place in September and should any amendments be required as a result of the formal consideration by Bromsgrove District Council we will advise you in due course.

2 The Council supports the aims and objectives of the plan and think that it has the potential to provide a strong base for planning in Wyre Forest once adopted, although a number of reservations do exist where clarity needs to be provided in order to the Councils concerns to be allayed. It must be stressed at this stage the Council wish to see all areas thrive and develop sustainably, and do not have an in-principal objection to Wyre Forest District Council allocating land for future growth, or developing policies to improve the quality of the environment across the District for its residents and visitors.

3 Our comments are restricted to the elements of the plan where possible issues arise for Bromsgrove as a result of the draft plan, whilst we have read and considered the remaining sections we do not feel it is appropriate or necessary for the Council to comment on policies developed to address local issues to Wyre Forest District only.

4 The Plan identifies a housing requirement of 5400 dwellings, 540 care home beds and 40 hectares of employment land, BDC has no reason to dispute those figures. The Council is also pleased to see in para 6.8 that under the duty to cooperate WFDC will continue to liaise with all adjoining authorities. It will be important for WFDC to continue this liaison as the plan progresses, it is acknowledged that Wyre Forest District does not form part of the wider Birmingham Housing Market Area (BHMA) and as such should not directly need to accommodate any additional growth needs arising from the BHMA. The continued liaison will be important to ensure that if all the needs of the BHMA cannot be met within the currently identified geographic area, then it could be that those areas on the periphery may need to assist in meeting those needs if it can be done sustainably. It is important the review of the Wyre Forest Local Plan has sufficient mechanisms in place to be able to respond appropriately to any requests to meet the needs of the wider BHMA should a request be forthcoming.

4 The main concern of the Council is the location of the larger core housing sites, the fact that a preferred option is not specified, and that we are requested to make a choice of option A or option B in relation to significant development. The core housing sites, and also the majority of the option A and B sites are all situated towards the eastern / north eastern extent of the urban area of Kidderminster. As the principal town the logic of allocating significant levels of development to the most sustainable settlement is understood and accepted.

5 Where the Council have concerns is the evidence which support these allocations, in particular the transport evidence which is required to support allocations of this size. It is clear from the Infrastructure Delivery Plan (IDP) that some consideration has been given to transport issues. What is concerning is that a preference for a preferred option is being sought without all the

identified evidence i.e. the modelling through the Wyre Forest Transport Model (WFTM), and the transport background paper being available.

The IDP states at 3.1.4

It should also be noted that local impacts of individual potential development sites can be more easily identified; however, the cumulative impact of development on both the local and wider strategic network is difficult to quantify without undertaking modelling. As detailed above, the WFTM will be used to fully assess all development sites, both individually and cumulatively, to ensure a robust assessment of the likely transport related infrastructure is identified and all appropriate multimodal infrastructure identified to support the preferred option.

6 Attempts have clearly been made to establish the infrastructure requirements for both the core option, and also options A and B. A comparison of the different highways impacts of options A and B has also been provided, unfortunately, this level of analysis does not allow for a sufficiently informed decision on the merits of the various options to be reached at this stage. Similarly whilst it is welcomed that a list of schemes has been developed to identify possible mitigation, what is not clear is exactly what these schemes entail, when and how they will be delivered, and how much impact their introduction will have on both mitigating the impacts of development or addressing existing infrastructure concerns.

7 Option A appears to offer the prospect of an eastern relief road which amongst other things could reduce the congestion and improve the air quality within Kidderminster town centre, both of these results would undoubtedly be beneficial. What needs to be established is the impact of such a significant piece of infrastructure on areas outside of the District. Of particular concern would be what additional traffic as a result of significant development and improved infrastructure around the eastern edge of Kidderminster would then permeate to areas further east into Bromsgrove. The same point applies if option A does not become the preferred option, it is still likely that additional traffic could use the infrastructure in Bromsgrove as a result of option B although without the bypass, again this needs to be established for an informed decision to be made on the pros and cons of the options.

8 The Council's principal concerns in terms of specific locations which may be affected would be, along the A456 through Hagley in order to access the Black Country / Birmingham conurbation, and then further along this route to the M5 Junction 4 in order to access the motorway network or the southern areas of Birmingham. Similarly the Council has concerns on the impacts on the A448 if additional trips are made into and through Bromsgrove to access the motorway network south of the town, or through the town to access Redditch beyond. As WFDC and WCC are aware both these locations within Bromsgrove suffer from congestion and both have AQMAs, the impacts of the various options on these key locations need to be established as well as any impacts in other areas related to the development sites. This is particularly important to understand the impacts in more rural areas where 'rat running' may occur in an attempt to avoid more congested routes, and also the impact on the strategic motorway network which places pressure on all routes across the area.

9 The Council would have hoped that the transport evidence would have been further developed, and made available to inform a preferred option, and not produced afterwards to

support / justify a preferred option chosen in isolation of the evidence. This is a position that the Council through its officers has expressed a number of times in response to both the draft IDP, and also in person at a meeting convened specifically to discuss the issue of transportation. Bearing this in mind the Councils position expressed in this response should not be a surprise, but unfortunately without this evidence being available the Council is not in a position to express a preference for option A or B, or even support the core option at this stage. This concern also arises albeit to a lesser extent on allocation of land for employment uses.

10 In order to address this concern and in line with the Councils response the recently published Draft LPT4. We would like to continue to engage with both WFDC and WCC to develop a wider transport strategy for north Worcestershire. The development of this strategy should help inform the production of local and district plans which have fully evidenced and coordinated transport information. The strategy alongside these local and district plans will then deliver the infrastructure required to allow the authorities to continue to grow and thrive in a coordinated and sustainable way.