

Introduction

1. The previous comments submitted by Bromsgrove District Council BDC in relation to this plan still stand, the comments below expand on those submitted previously. At the time of submission they are submitted as officer comments, they will be presented to BDC members in due course for their consideration.
2. It remains the view of BDC that unfortunately The Wyre Forest Local Plan (WFLP) is unsound, BDC do not consider that the plan is Justified, Effective, or Consistent with National Policy. It is also unfortunate that BDC also now raises concerns about whether the requirements of the Duty to Co-operate to have been met.

Evidence concerns

3. Without repeating the previous concerns verbatim the issue that BDC has is that it is still unclear as to what the transport impacts are, of the WFLP on Bromsgrove District. Concerns were expressed previously on the clarity of the work provided to support the 2018 publication version of the plan. Although efforts have been made to address these concerns, the fact remains that from the published information it is, in the view of BDC, not possible to clearly see what the impacts of the developments sites are, and then clearly understand the mitigation strategy.
4. The need for a more robust transport evidence base has been something that BDC has been raising throughout the development of the WFLP. In response to BDCs November 2018 objection, further discussions took place in February and March 2019 where BDC continued to express its position, with WCC officers in attendance. It is BDCs understanding that these discussion in part led to the additional document that has been published, *Wyre Forest Local Plan Review, Transport Evidence June 2019*. It had been hoped that the content of this document would have addressed the previous concerns BDC raised but unfortunately it does not do this. The position of BDC is, and has always been, that the Council would like to be able to understand the impacts of the plan on the infrastructure within Bromsgrove District, and then to clearly understand how the proposed mitigation and its delivery has been arrived at.
5. Unfortunately the *Wyre Forest Local Plan Review, Transport Evidence June 2019* does not satisfy this information gap. It is the view of BDC that the document has flaws. The document at section 4 attempts to suggest that an assessment has been done to confirm that the model is fit for purpose. BDC does not see how any actual assessment has been done, and consider that it is not possible to make the conclusion at para 4.6 based on the information in the preceding section.
6. A more significant concern is that although there is new information in this report, it is still not possible to ascertain from the information provided what the actual impact of development would be. The document shows that flows and journey times will increase in many locations, but without a base year, or updated base year to compare against, all that can be concluded is that there will be more trips on the network. Without being able to compare a scenario where WFLP developments are not present, and where WFLP developments are present, understanding what the actual impacts of development are, is impossible.
7. Another concern with this piece of evidence is that there is no modelling with any mitigation included. Therefore from the evidence available it is not possible to understand if the suggested mitigation in the Infrastructure Delivery Plan (IDP) actually mitigates both individual development sites and also the cumulative impacts of the WFLP.

Infrastructure Delivery Plan

8. Turning to the IDP the BDC position remains the same as previously expressed. The Council's previous concerns centered on the untested and in some cases un-costed schemes and proposals in the IDP. Whilst it is acknowledged that changes have been made to the IDP it is still unclear what the links are between the impact of development and the mitigation that is specified. This is a particular concern for the A456 through Hagley, where previous proposals for a bypass have been softened and the need for a wider review working with other councils seems to have replaced this proposal. BDC has no objection in principle to a wider review of transport infrastructure; indeed it would expect this consideration to come to the fore as the review of the Bromsgrove District Plan gathers momentum. However it is not considered appropriate at this stage to leave it to a wider infrastructure review to mitigate the specific impacts of the WFLP, should they ever be clearly identified, it maybe that the impacts are not significant to warrant such a review or if the impacts are proved to be significant, it is something which may be too late to address via plan making.
9. It is also considered that the Duty to Cooperate and Statements of Common ground that BDC will prepare to support its plan are not the place to decide what infrastructure is required to support the developments in Wyre Forest, as para 3.1.21 of the IDP seems to be suggesting. It is the view of BDC that the infrastructure needs of the WFLP need to be clearly identified in the evidence that supports that plan, and mechanisms put in place to allow for any cross border infrastructure to be delivered. BDC has a strong track record of such an approach both working with Birmingham City Council on the Longbridge Area Action plan, and more recently in working with Redditch Borough Council in providing cross boundary allocations in Bromsgrove District to meet the needs of Redditch Borough.
10. Para 3.1.24 of the IDP discusses the rail enhancement taking place at Blakedown station. BDC does not have an objection in principle to this enhancement. However there are concerns with the following statement:

'Enhancements to parking facilities at Blakedown Station will also help to mitigate the impact of growth on Hagley within Bromsgrove District. Hagley currently suffers from congestion at peak times and this is considered to be a first step in reducing congestion before wider strategic improvements can be considered and implemented.'

It is not clear how the addition of parking at this station combined with other strategies such as improving of the A450 corridor work together to reduce congestion in Hagley. It could be argued that improving the A450 corridor without complementary improvements on the Hagley area just allows the congestion to get to Hagley quicker. It is of interest to BDC to understand the amount of congestion that improvements at Blakedown will relieve in Hagley, and also the process which has been undertaken to identify this reduction.

Duty to Co-operate

11. The above paragraphs largely reiterate the concerns that BDC has over the robustness of evidence base to support the plan. BDC considers it has engaged fully in the attempts to ensure that the DTC has been met. As highlighted above these evidence related issues are longstanding concerns that BDC has expressed many times. It had been hoped that early engagement initiated by BDC in May 2018, where

concerns were expressed about the evidence base that was being worked on to support the previous publication version on the WFLP, would have ensured that no objection needed to be submitted at that time; unfortunately that was not the case, and the Council's previous objection was submitted.

12. As referred to above in an attempt to ensure constructive engagement, meetings took place in February and March 2019, where a set of actions were agreed by all parties which it had hoped would result in a robust evidence base which addresses the concerns of BDC. The work which was prepared as a result of these discussions was only seen by BDC in June 2019.
13. In June 2019 WFDC published the local plan documents as part of its Overview and scrutiny agenda for the meeting of 4th July 2019. On initial review of these documents BDC again expressed concerns that this evidence still does not address the longstanding issue of clarity of the development impacts. It was agreed that a DTC meeting needed to take place. This meeting took place on the 30th July 2019, at this meeting a set of actions were agreed which would provide BDC the information it sought, in particular the impacts of development on the Hagley area. It was agreed that this information should be provided for the 29th August 2019, prior to the representation period on the publication version of the plan opening. A meeting was penciled in to discuss this additional work on the 29th August. Subsequent to this meeting it is understood that WFDC contacted WCC separately to request that the work is not provided for the 29th August as agreed, minutes of that meeting confirm this;

Following on from this meeting WFDC reviewed the proposed meeting date for discussion of Hagley paper and next steps (29th August). They concluded that as there was not time for them to review all the information in advance of the regulation 19 consultation, they would rather the meeting was postponed until late September to allow more time for the paper to be prepared and reviewed and the consultation to commence.

14. On receiving notification on the minute above BDC requested a further amendment was made to the minutes as below,

BDC must point out on the record that the reason for the timescale was to allow for all the documents to be available for the start of the representations period. We have reservations about this revised timescale for the publication of the work and the possible implication that BDC and other stakeholders will not have full access to the evidence for the full duration of the regulation 19 representation period.

15. At the time of writing this representation the information which was agreed on the meeting of the 29th July has still not been provided, and therefore this objection has had to be drafted.

Concluding Comments

16. BDC continues to raise concerns about the lack of a robust evidence base and, also unfortunately raises potential concerns about the ability of WFDC to meet the DTC. It is hoped that working within the relevant regulations which dictate the plan making process from this point forward, and by continuing to engage with Wyre Forest District Council and Worcestershire County Council, that a solution to the issues above can be found in advance of the submission of the Wyre Forest Local

Plan. The outcomes of this ongoing engagement can then be reported in the Statement of Common ground which we understand will accompany the submission.