

Wyre Forest District Council - Local Plan Review (2016 - 2036)

Local Plan pre-submission consultation

Dear Sirs,

AddisonRees Planning Consultancy are acting on behalf of Blakedown Parish Council as part of the Local Plan Review pre-submission consultation.

Blakedown Parish Council would like to make a number of objections to the latest pre-submission consultation, which runs until 14 October 2019. This letter should be read alongside the technical note on highway/sustainability matters, which has also been produced on behalf of the Parish Council.

This representation focusses upon the issues relating to the proposed allocations (Ref. WFR/CB/2 & WFR/CB/3) as set out in the 'Amendments to the Pre-Submission Publication Document July 2019'.

Before looking at the individual allocations, there are a number of concerns over the evidence produced to justify the need for further train station car parking in Blakedown.

1. Need for Train Station Car Parking

The evidence has been primarily defined within the following documents:

- Worcestershire's Local Transport Plan (LTP) 2018 – 2030
- Worcestershire Rail Investment Strategy Supporting Development of Worcestershire's Local Transport Plan 4
- SLC Blakedown Station Car Park Options Report for Worcestershire County Council (2019)

The Worcestershire LTP outlines a specific infrastructure enhancement scheme for Blakedown Rail Station. This identifies a number of potential enhancements, such as:

- Improvements to passenger information and station facilities for passengers;
- Facilities that will cater for current and future demand growth;
- Improvements to walking /cycling routes to the station;
- Improvements to access arrangements for cyclists and provide additional new cycle storage facilities;
- Set-down and pick-up facilities for taxi users and operators;
- Improve facilities for passengers with disabilities or who experience difficulty using the railway station facilities;
- Improvements to car parking;
- Working with Train Operating Companies to improve services.

1.1 One of the enhancements relates to improvements to the car parking at the station. This is supposedly backed up by evidence contained in the Worcestershire Rail Investment Strategy for the LTP 4.

1.2 The below images are taken from this document, which outline car parking capacity and the impact of growth of station passenger numbers and car parking capacity.

Table 3.15 – Car Parking Capacity Growth At Worcestershire Stations To 2043
(Table Is A Development Of Figure 3.2) ¹

Station	Daily Return Passengers	Car park Capacity 2018	Passengers per Car Park Space 2018	Daily Return Passengers 2043	Car Park Spaces Needed 2043	Number of New Spaces Needed
Worcester Foregate Street	3,572	0	n/a	7037	n/a	n/a
Kidderminster	2,523	224	11	4971	441	217
Redditch	1,561	196	10	3076	384	188
Bromsgrove	966	251	4	1902	494	243
Worcester Shrub Hill	963	121	8	1898	238	117
Droitwich Spa	875	45	19	1724	89	44
Great Malvern	868	122	7	1709	240	118
Hagley	848	33	26	1670	65	32
Worcestershire Parkway	597	500	1	1176	985	485
Malvern Link	536	96	6	1056	189	93
Barnt Green	421	60	7	829	118	58
Evesham	398	70	6	784	138	68
Alvechurch	260	70	4	513	138	68
Pershore	157	17	9	309	33	16
Blakedown	151	10	15	298	20	10
Honeybourne	90	42	2	178	89	47
Wythall	86	0	n/a	169	0	0
Hartlebury	78	20	4	154	39	19
Total COUNTY	14,951	1,877	8	29,454	3,702	1,825

Table 5.3 – Impact Of Growth To 2023/2043 On Station Passenger Numbers And Car Park Capacity

Station	Annual Usage 2015/16	Daily Return Passengers	2015/16 Car Park Capacity	Passengers Per Car Park Space 2017	Forecast 97% Growth To 2043 (14/15 base)
Worcester Foregate Street	2,293,021	3,572	-	n/a	4,348,789
Kidderminster	1,619,928	2,523	224	11	3,076,970
Redditch	1,002,294	1,561	196	8	1,695,519
Bromsgrove	619,880	966	251	4	1,121,343
Worcester Shrub Hill	618,467	963	121	8	1,172,942
Droitwich Spa	561,908	875	45	19	1,050,537
Great Malvern	557,012	868	122	7	1,070,100
Hagley	544,318	848	33	26	946,498
Worcestershire Parkway	opens 2019	597	500	opens 2019	755,298
Malvern Link	344,232	536	96	6	617,646
Barnt Green	270,142	421	60	7	494,982
Evesham	255,476	398	70	6	488,016
Alvechurch	167,154	260	70	4	285,303
Pershore	100,690	157	17	9	187,760
Blakedown	97,028	151	10	15	180,645
Honeybourne	57,978	90	42	2	110,670
Wythall	55,044	86	-	n/a	101,930
Hartlebury	50,088	78	20	4	77,519
Total COUNTY	9,214,660	14,951	1,877	8	17,782,467

Table 5.3 – Impact Of Growth To 2023/2043 On Station Passenger Numbers And Car Park Capacity
(continued)

Station	Car park spaces needed 2043 (15/16 capacity)	Number of new spaces needed 2043 (15/16 capacity)	Growth since 2009/10	Desired 2015/16 car park capacity	Car park spaces needed 2043 (15/16 desired)	Number of new spaces needed 2043 (15/16 desired)
Worcester Foregate Street	n/a	n/a	54%	n/a	n/a	n/a
Kidderminster	441	217	22%	300	591	291
Redditch	384	188	17%	180	355	175
Bromsgrove	494	243	41%	350	690	340
Worcester Shrub Hill	238	117	-28%	150	296	146
Droitwich Spa	89	44	19%	70	138	68
Great Malvern	240	118	20%	150	296	146
Hagley	65	32	16%	33 (as is)	33 (as is)	0
Worcestershire Parkway	985	485	opens 2019	500	985	485
Malvern Link	189	93	38%	120	237	117
Barnt Green	118	58	22%	60	118	58
Evesham	138	68	25%	90	177	87
Alvechurch	138	68	21%	120	237	117
Pershore	33	16	71%	100	197	97
Blakedown	20	10	14%	40	79	39
Honeybourne	89	47	65%	90	177	87
Wythall	n/a	n/a	23%	0	n/a	0
Hartlebury	39	19	108%	40	79	39
Total COUNTY	3,702	1,825	32%	2,403	4,685	2,086

1.3 As can be seen above, Blakedown has 151 daily passenger returns, with a car parking capacity of 10 spaces. Based on the growth predictions, the number of daily passenger returns in 2043 will increase to 298, which requires a car park increase of a further 10 spaces to accommodate this growth. With the exception of one other station, Blakedown has the lowest requirement for new car parking spaces in Worcestershire up to 2043.

1.4 The annual usage of Blakedown in 2015/16 was 97,028. The growth of passengers identified in the report will increase this usage to 180,645. This is the 4th lowest annual usage level out of all train stations in Worcestershire. Based upon the findings in the final table, Blakedown train station now requires a total of 79 car parking spaces to meet an identified 14% growth of passenger usage up to 2043.

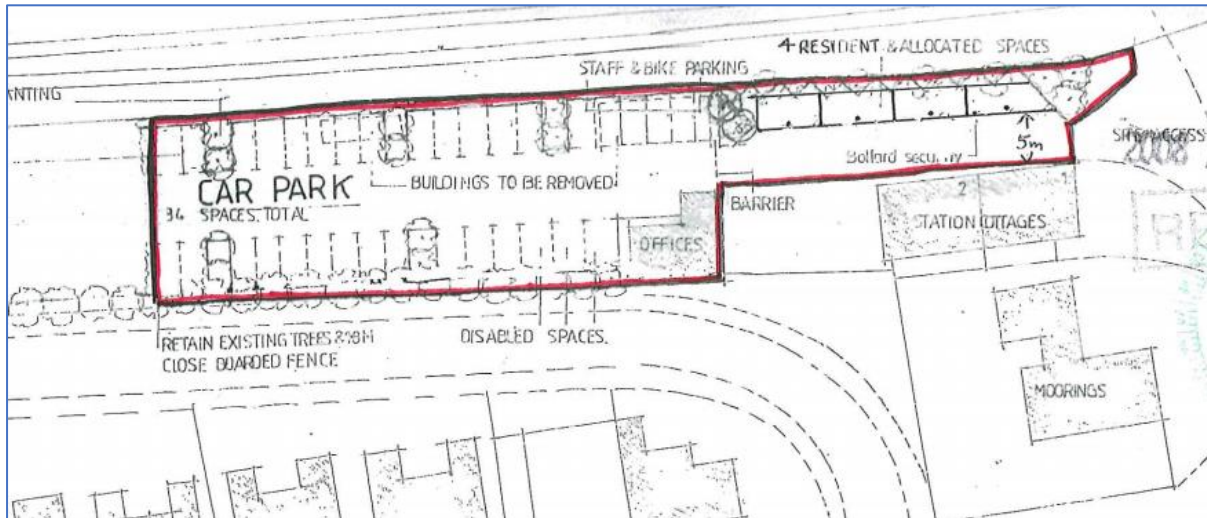
1.5 In light of the above evidence, the Council have determined that as part of their Local Plan Review (up to 2036 only, which is 7 years earlier than the final predicted growth levels of 2043), two sites should come forward in Blakedown to meet the predicted need of 79 car parking spaces.

1.6 The first allocation is identified in the Local Plan Review as 'Station Yard Blakedown WFR/CB/2'. This is a parcel of land to the north/west of Linwood Drive adjacent the railway line. Additional wording under AM36.10 has been added in this latest consultation, which sets out the following:

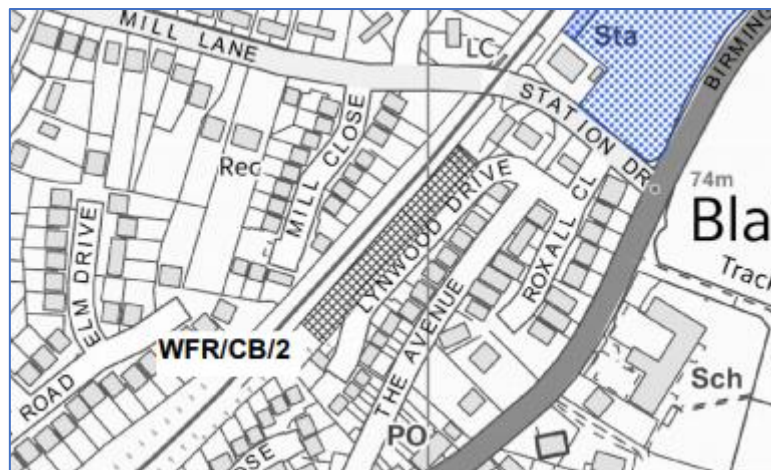
"This small site is unsuitable for residential use. Its location adjacent to Blakedown Station makes it an ideal site for station car parking. The Worcestershire Rail Investment Strategy (2017) identifies Blakedown as one of 5 locations under consideration for additional car parking to address the current shortfall and provide capacity for passenger growth. Further details are included in the Transport Evidence paper and the Infrastructure Delivery Plan".

1.7 The Council have therefore allocated this site for future station parking. The site is within the development boundary of Blakedown outside of the Green Belt on brownfield land. It is also worth noting that planning permission has also been previously granted for 34 spaces under Ref. 08/0430/FULL, though this permission was never implemented. The below images show the site area and layout approved.





1.8 It is clear from the above images that the application site could be extended further south to accommodate additional car parking spaces. This is reflected in the allocation of the site under Ref. WFR/CB/2 as shown on the updated maps.



1.9 It is therefore clear that the allocation WFR/CB/2 can accommodate a significantly larger parking area than the 34 spaces previously granted planning permission. This would help to deliver the identified need of 79 spaces up to 2043.

1.10 Notwithstanding this, the Council are now relying on additional information on the growth of rail use and parking requirements to justify a new mixed use allocation within Blakedown.

1.11 A SLC Rail Report used by the Council is based upon evidence from the Rail's Markets Studies (2013/14) and this has indicated that the need identified for parking in LTP 4 is conservative. However, there is a fundamental issue with this evidence outlined by SLC Rail. The need is based upon figures, which appear older than the evidence produced by Worcestershire County Council in their 2017 LTP 4.

1.12 It would appear that the Council have introduced this new contradictory evidence to embellish the need for further parking provision in Blakedown.

1.13 The report now identifies that there will be a 99% increase in car parking provision required for both Kidderminster and Blakedown. This now equates to a need of 624 spaces, which is a further 390 spaces than identified by the LTP 4 report.

1.14 In light of this new evidence, the SLC Rail Report identifies that Blakedown can deliver 250 car parking spaces with the car park allocation and new mixed use allocation. This would meet 64% of the overall requirement for both Kidderminster and Blakedown. The Council have therefore determined that Blakedown, a small rural village needs to accommodate a further 171 spaces above and beyond the original evidence produced by the Worcestershire County Council.

1.15 The evidence provided in LTP 4 clearly outlines that only 79 additional spaces are required in Blakedown to meet the identified growth up to 2043. These spaces can be met by the allocated car park site under Policy WFR/CB/2.

1.16 It is clear that the proposed allocations in Kidderminster (i.e. the Lea Castle site in particular circa. 1400 new homes and mixed use development) has resulted in significant sustainability concerns in terms of the capacity for Kidderminster to support such growth from a transport point of view.

1.17 The Council have therefore sought to find new evidence away from the Worcestershire County Council, which identifies a significantly higher growth level for rail transport and parking provision. This has clearly been done to show that Kidderminster is significantly short in meeting the predicted growth levels of usage and parking at the station and that there is no capacity to deliver what is required to meet the growth in the future.

1.18 Therefore, as a result of the above, this places a significant pressure upon the remaining train stations in the District, which in this case happens to be Blakedown, which is approximately 4 miles away.

1.19 In order to prove that the Lea Castle allocation meets the sustainability requirements of the Local Plan Review, the Council appear to have manufactured this latest evidence to prove that Blakedown train station car park requires a significantly higher level of growth than determined in the LTP 4. The Council have effectively pushed the additional growth and transport pressures from Kidderminster on to Blakedown.

1.20 This rural village is now proposed to deliver approximately 250 new car parking spaces, which is 171 spaces more than the growth initially identified for Blakedown.

1.21 Drawing together the above, it is our contention that the need for 79 additional train station parking spaces can be met by allocation Ref. WFR/CB/2. The additional evidence produced by the Council contradicts that of the LTP 4 and appears to be based on unsubstantiated evidence. It appears that the further 171 spaces has been manufactured in order to justify the substantial urban extension at Lea Castle, which is clearly going to have significantly adverse impacts upon the surrounding transport network. Therefore, using a small scale village such as Blakedown to overcome the sustainability issues of Kidderminster will fundamentally undermine the sustainability credentials of this Local Plan Review.

2. Allocation Ref. WFR/CB/3 Land off Station Drive, Blakedown

2.1 As outlined above, it is our contention that there is no need for any further train station car parking within Blakedown that cannot already be met by the car park allocation at Station Yard.

2.2 Notwithstanding this, there are a number of concerns with the proposed allocation in terms of how it accords with planning policy.

2.3 Policy AM36.11 Land off Station Drive, Blakedown WFR/CB/3 – sets out:

“The parcel of land is removed from the Green Belt and allocated for a mix of station car parking and residential development (indicative 50 dwellings).

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 the site to the north 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.*
6. *Large oak tree adjacent to entrance on Station Drive must be protected with its canopy kept free of lighting*
7. *Station parking to be provided mainly in the form of a half basement and podium deck located along western boundary of site*
8. *Potential adverse impacts on views from/of Harbrough Hall to be mitigated for by additional planting along 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.*

The ‘Reasoned Justification’ states under AM36.20 & AM36.21 that:

“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 into Hagley and Kidderminster for other services. This allocation will require an amendment to the settlement boundary with the land being removed from the Green Belt.

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”.

2.4 The first significant objection to this allocation is based upon its removal from the Green Belt.

2.5 Paragraph 133 of the updated Framework states that *“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.*

2.6 Paragraph 136 also outlines that *“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans”*.

2.7 Paragraph 137 continues by highlighting that *“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”*.

2.8 As outlined above in this representation, there are serious concerns over the evidence the Council appear to be relying upon to remove this allocation from the Green Belt and allocate it for a mixed use development but primarily for an additional 170 car parking spaces.

2.9 The Wyre Forest District Council Green Belt Review Part II - Site Analysis document sets out three levels of assessment for site contributions of each parcel land proposed to be removed from the Green Belt. These are:

- *The site makes a **Significant Contribution** to (a) Green Belt purpose(s) and release (either in whole or part) is only likely to be considered where particular material planning considerations exist to justify this.*
- *The site makes a **Contribution** to (a) Green Belt purpose(s) and release (either in whole or part) would need to be balanced against various material planning considerations.*
- *The site makes a **Limited Contribution** to (a) Green Belt purpose(s) indicating that release (either in whole or part) could be considered in the context of other material planning considerations*

2.10 The proposed allocation for Land off Station Drive, Blakedown is identified as an area of land of 2.25ha and for 35 units. The review states that the site is *“in arable use, bounded by Station Drive, a railway line, the A456 Birmingham Road and a hedgerow/thick woodland associated with a watercourse. The site is predominantly level but slopes gently down towards the watercourse. The site is visually well enclosed, although this is less strong on the A456 edge and the site forms part of the eastern entrance to Blakedown, complementing open land on the opposite side of the A456. There is no public access and prior to site investigation, there are no recorded nature conservation or cultural heritage interests on the site”*.

2.11 In terms of the assessment of the site, the report outlines that that *“The site makes a contribution to Green Belt purposes because of its containment of Blakedown particularly along the A456 Birmingham Road. The high degree of physical and visual containment limits the impact of development on the Green Belt, although this is a gateway site into Blakedown which is locally significant in turn demanding particular attention to edge treatment, built density and massing”*.

2.12 It is clear from the above that the site is considered an important gateway site into Blakedown and makes an important contribution because of its containment of the village along the A456. It is

also significant that the site analysis was based on the provision of a site area of 2.25ha and for 35 dwellings.

2.13 The current pre-submissions amendments now proposes a site area of 2.75ha; 50 dwellings and a new 170 space train station car park, which will be provided in the form of a half basement and podium deck located along the western boundary of site. These changes will have a significantly greater impact upon the contribution to the Green Belt than previously assessed under the 2017 review.

2.14 The Council's Green Belt Review and site analysis is therefore flawed and does not fully assess the implications of this proposed new allocation.

2.15 It is clear that the Council did not previously consider including a car parking area within this allocation when they assessed its removal for an allocation of 35 dwellings on a smaller site.

2.16 The Council may suggest that 'local transport infrastructure which can demonstrate a requirement for a Green Belt location' can be appropriate development and would therefore not need to be considered in the Green Belt analysis. However, it is clear that the need for the additional 170 parking spaces has only be determined in 2019, two years after the Green Belt Review. In any case, the Council have failed to demonstrate the need for the spaces.

2.17 The provision of 50 houses and 170 space car parking area will result in a major development. The density and massing of this allocation will be significant and will completely erode this important gateway site, encroaching significantly east along the Birmingham Road. The site will be clearly visible from surrounding areas and would not be physically or visually contained. This allocation proposes major development of a scale, which is completely out of character with the village of Blakedown.

2.18 Whilst no details are provided on the final design of the proposed allocation; there are likely to be significant infrastructure works required to deliver the scheme. This will result in the site being more visible and prominent within the Green Belt. The surrounding openness would be severely harmed.

2.19 The allocation also encroaches further towards the town of Hagley, which will be subject to significant areas of land being removed from the Green Belt to accommodate the significant growth required to meet the housing needs of Bromsgrove District and Birmingham. There are strong concerns that the Council have not undertaken an appropriate Duty to Cooperate with adjoining authorities.

2.20 Under paragraph 134 of the Framework, it's stated that the Green Belt services five purposes. These are to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The proposal allocation fails on all of these purposes.

2.21 The proposed removal of the site from the Green Belt and allocation for 50 dwellings and a 170 space car parking area would represent inappropriate development. The Council's own review of the

Green Belt has failed to accurately reflect the impact of this revised allocation and the evidence behind the need for the parking allocation in Blakedown is significantly flawed.

2.22 The proposed allocation would represent inappropriate development, which by definition, is harmful to the Green Belt. The Council have failed to provide exceptional circumstances to demonstrate why this site should be removed from the Green Belt.

3. Need for Housing

3.1 As set out in the Settlement Hierarchy Technical Paper July 2019, Blakedown is identified as a 'village' *"located to the north east of the District, along the main transport route into Birmingham. This settlement has a number of key facilities, including a primary school, post office, shops and public houses. Blakedown is the only village in the District that has a main line railway station. The railway station at Blakedown therefore provides sustainable access into larger settlements, such as Kidderminster and Birmingham and therefore increases the sustainability of this settlement"*.

3.2 Policy AM6B - Locating New Development of the 'Amendments to the Pre-Submission Publication Document', sets out that Blakedown is defined as 'Other Villages and Rural Settlements'. These locations have varying ranges of local services and facilities and that development should be limited to infill housing within the development boundaries and to meet local needs via allocated sites and rural exception sites in appropriate circumstances.

3.3 The total of number of houses proposed to be allocated to all the rural settlements in the District is 115. This has been increased from the initial pre-submissions process, which originally identified only 65 dwellings. Blakedown would therefore accommodate approximately 58% of all village growth during the next plan period.

3.4 The Wyre Forest District Housing Need Study 2018 has identified that there is only an annual affordable housing need within Churchill and Blakedown of 3 dwellings per annum. As part of the Neighbourhood Plan adoption, there was evidence of need for only 7 affordable houses and 18 market houses required over the plan period. The provision of 50 dwellings would go well beyond what Policy AM6B is seeking to achieve in village and rural settlements.

3.5 It is clear that the Council are using the SLC Rail report to justify the provision of 50 dwellings in Blakedown. This is not due to the village being the most appropriate location of new residential development in the District, but as a means to help deliver the proposed train station parking area.

3.6 The SLC Rail Report specifically highlights this point under paragraph 4.3.1 stating that *"An alternative option has been discussed with a local land developer and identifies a land allocation with 50 proposed residential units and 170 car park spaces for rail users..."*.

3.7 Wolverley, Wilden, Fairfield, Cookley, Chaddesley Corbett all score higher than Blakedown in the 'Individual Settlement Analysis' undertaken in the Settlement Hierarchy Technical Paper. These villages are all deemed to be more sustainable in terms of their access to services and facilities. Yet Blakedown is taking 58% of the village growth alone over the next plan period.

3.8 Blakedown does not have a doctor's surgery; dentist; secondary school or any employment opportunities. The village should only be accommodating a level of growth commensurate to that of the other villages.

4. Delivery of Allocation Ref. WFR/CB/3

4.1 The Council appear to be relying on the conclusion of the SLC Rail Report that a developer led scheme for 50 dwellings in Blakedown will deliver the train station parking area. The reality is that a residential development of 50 dwellings, which needs to provide 25% affordable housing (in line with Policy 8B) and other tariff style contributions (i.e. highway improvements; open space; education; recycling etc) will not be able to financially support the development of the car park. The viability of a scheme for 50 houses will already be tight with the existing standard contributions outlined in the Local Plan.

4.2 The Council have not considered the viability implications of this allocation in terms of the delivery of the car park. This in our view completely undermines the justification for the 50 houses and the 170 car parking spaces in Blakedown. The Council have shown no evidence, which demonstrates that the 50 dwellings can deliver the required 170 spaces for the car park. This allocation places a significant financial burden on any future developer wishing to build out the residential allocation.

4.3 Even if the 50 dwellings can support the delivery of the car park; it is highly likely that the scheme will not be able to provide any affordable housing or other tariff style contributions. This would therefore result in increased pressures upon the existing housing needs of local people and the services and facilities already provided in the village. There would be no mitigation from the development.

4.4 Drawing together the above, it is considered that the Council have failed to provide any robust evidence to justify the provision of 50 dwellings in Blakedown and demonstrate how these units will deliver the 170 car parking spaces now required in Blakedown.

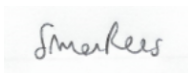
5. Other Matters:

5.1 The SLC report insists on referring to Kidderminster and Blakedown as though the 2 stations are interlinked and interchangeable, which they are not. The maximum numbers in the calculations for LTP4 have got up to 79 car parking spaces for Blakedown, which can (if necessary) be accommodated within Station Yard. The additional 170 spaces are to make up for the shortfall at Kidderminster, which has, and will continue to have 224 spaces. But because they are not one and the same station, simply transferring the 170 spaces to Blakedown does not mean the passengers will transfer as well, because probably at least half of them they will be travelling to other stations not served by trains from Blakedown (the baseline data is that numbers commuting to Birmingham and Worcester in Wyre Forest is about a 50/50 split.) This puts the SLC figures further in doubt.

5.2 In terms of demographics – by 2036 the population of Wyre Forest is expected to grow by 4.9% to 105,300. Currently 60.8% of the population are economically active, although this will diminish by 2036 as the population ages. Of these 40.9% work in Wyre Forest, about 4,750 in Wychavon, and 3,400 each travel to Dudley, Birmingham or Worcester. These demographics would not deliver 97% increases in rail users in the region.

5.3 Drawing together the above, it is our view, there have fundamental errors in the way in which the Council have sought to amend the pre-submission document. We would respectfully request that an independent inspector seriously considers the points raised in this response and the technical note during the examination process.

Yours sincerely



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