

Wyre Forest District Local Plan Pre-Submission Publication 2019

Consultation Response Form

2 September – 14 October 2019

REF OFFICE USE ONLY:

Representor number:

Representation number:

Plan reference:

Tests of soundness:

This form has two parts: **Part A** Personal Details and **Part B** Your Comments

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has issued this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the public examination. Using the form to submit your comments also means that you can register your interest in speaking at the examination.

Please read the guidance notes carefully before completing the form. If you responded to the last Pre-Submission consultation held in 2018, you do not have to respond again unless you want to add to them, withdraw them or make completely new comments.

Please fill in a separate part B for each issue/comments you wish to make.

Any additional sheets must be clearly referenced. This form can be submitted electronically. If hand writing, please write clearly in blue or black ink.

Consultation response forms can be completed and submitted online at www.wyreforestdc.gov.uk/localplanreview

Comments must be received by 5:00pm on 14 October 2019. Comments received after this time will not be considered.

Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mrs	
First Name	Angela	
Last Name	Preece	
Organisation (where relevant)	Churchill & Blakedown Parish Council	
Job title (where relevant)	Clerk	
Address – line 1	24 Holmes Orchard	
Address – line 2	Alveley	
Address – line 3	Shropshire	
Postcode	WV15 6NX	
E-mail Address	churchillandblakedownclerk@gmail.com	
Telephone Number	07572108924	

Part B - Please use a separate sheet for each comment

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation

Churchill & Blakedown Parish Council

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

No

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

Yes, specific comments

b) If specific comments only, please specify which ones?

Expand Box / Continue on a separate sheet if necessary

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

No

Pre-Submission Local Plan (October 2018 version)

Yes

No

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph Policy

Other: e.g. Policies map, table, figure, key diagram

FR/CB/2 - Station Yard, Blakedown
 Appendix B - Map A - Pre-Submission Policies Map July 2019
 Appendix B - Map B - Site Allocations District Overview Map July 2019
 Appendix B - Map E - Site Allocations Overview Blakedown July 2019
 Appendix B - Map K - Key Diagram July 2019

6. Do you want to support/object/comment on this part of the Local Plan?:

Support Comment Object

7. Do you consider the Local Plan is:

a) Legally Compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
b) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
c) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="X"/>

8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared Justified Effective Consistent with National Policy
 Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Planning/Highways
 Please see attached Planning and Highways Advice received by The Parish Council which demonstrate why the Local Plan Amendments are not Positively Prepared, Justified, Effective, or Consistent with National policy

Documents attached from:
 Simon Rees BSc, MA, MRTPI (Director), AddisonRees Planning Consultancy Ltd
 John Lloyd BSc MSc (Transport Planning and Engineering) MCIHT

Legal Advice
 The Parish Council has taken advice from Counsel at Landmark Chambers in regard to Policy 36.6A, in particular the proposed Policy/Site AM36.11 FR/CB/3 – Land off Station Drive, Blakedown.

This causes us to also doubt the legal compliance of the Consultation Process in regard to Policy AM36.6/AM36.10 – Station Yard, Blakedown

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to our representation on Site FR/CB/3 – Land off Station Drive, Blakedown

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

No I do not wish to speak at the examination.

Yes I would like to speak at the examination.

12. If you wish to speak at the examination, please outline why you consider this to be necessary:

If it will assist The Inspector The Parish Council wishes to reserve the right to speak at the Examination or to allow its planning, highways and legal advisers to do so

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to speak at the examination.

13. Are there any other comments you would like to make?:

Please see attached:

Planning Advice

Prepared by Simon Rees BSc, MA, MRTPI (Director), AddisonRees Planning Consultancy Ltd

Highways Advice

Technical Note - Proposed Land Allocations at Lea Castle & Blakedown

Prepared by John Lloyd BSc MSc (Transport Planning and Engineering) MCIHT

Dated 8/10/19

Please also see The Parish Council's Further Comments below

1	<p>The evidence based is flawed</p> <p>The statistics and growth forecasts adopted by SLC Rail have not been verified or tested Blakedown has a limited need for additional parking spaces by 2043.</p> <p>The evidence base in SLC Rail’s Report pre-dates that used in Worcestershire County Council’s LTP4 Report.</p> <p>It is contradictory and embellishes the need for further parking in Blakedown.</p> <p>The additional evidence produced by the Council contradicts that of Worcestershire County Council’s LTP 4 and appears to be based on unsubstantiated evidence.</p> <p>The further 171 spaces have been manufactured to justify the substantial urban extension at Lea Castle, which is clearly going to have significantly adverse impacts upon the surrounding infrastructure</p>
2	<p>The treatment of Kidderminster and Blakedown Stations should not be interchangeable</p> <p>Kidderminster has more frequent and varied services, hence its greater use and popularity.</p> <p>Moving a perceived (and questioned) car parking requirement 3 miles along the road to meet WCC’s plans will not solve the problem</p>
3	<p>The identified housing sites in The Plan to the eastern side of Kidderminster are not sustainable in transport terms which has caused the “push” eastwards to Blakedown</p> <p>The proposed extension to the eastern side of Kidderminster and Lea Castle has resulted in significant sustainability concerns in terms of the capacity for Kidderminster to support such growth from a transport point of view.</p> <p>The Council have effectively pushed the additional growth and transport pressures from Kidderminster on to Blakedown.</p> <p>Using a small scale village such as Blakedown to overcome the sustainability issues of Kidderminster fundamentally undermines the sustainability credentials of this Local Plan Review.</p>

4	<p>The Council’s approach is contrary to NPPF</p> <p>A proper assessment of alternative potential sites, including both non-Green Belt and Green Belt locations does not appear to have been carried out, especially in co-operation with neighbouring Authorities.</p> <p>The Council has not demonstrated proper regard to sustainable development objectives, or that the proposed brownfield and green belt sites are the most sustainable options taking account of all relevant factors including travel impacts, loss of amenity, and seriously compromising the basic purposes of including land in Green Belts.</p> <p>In particular Hartlebury Station (Wychavon District Council) is arguably more accessible to residents of the southern and western sides of Kidderminster, Bewdley and Stourport, and which is adjacent to large parcels of brownfield land</p>
5	<p>Over intensification of use of site and loss of amenity to neighbouring residents</p> <p>The lapsed planning consent for Station Yard 08/0430/FULL - Change of use to car park, landscaping and associated works was for only 34 cars, so the current proposal is a significant increase.</p> <p>That permission contained numerous conditions to safeguard the amenity of neighbouring residents including landscaping, lighting, hours of use, and retention of boundary trees – many of which have now been removed</p>
6	<p>Compromised Access</p> <p>In the recently refused application for residential development 14/0661/OUTL, Network Rail as a Statutory Consultee commented “One thing to consider though is that if the access road directly adjacent to the level crossing is being converted into parking as part of the same scheme then the risk of blocking back over the crossing is still possible. With that in mind Network Rail still propose that the original mitigations that were suggested (keep crossing clear signs, yellow box markings) are retained and funded by the developer”</p> <p>There was also concern by the Planning Officer about significant loss of amenity to residents of neighbouring houses on Lynwood Drive and Swan Close.</p> <p>This view was shared by the Planning Inspector at Appeal.</p>
7	<p>No apparent regard to the recent Churchill & Blakedown Neighbourhood Plan (Adopted 26/7/17)</p>

8	<p>Lack of detail and consideration of highways issues, access and proximity to level crossing</p> <p>Junction layouts, in particular the proximity to A456/Station Drive, Lynwood Drive and proximity to level crossing will cause significant access issues into and out of the site</p>
9	<p>Requirements for traffic calming and on street parking management have not been considered</p>
10	<p>Concern over use of unsuitable country lanes or already congested A and B road network to reach station:</p> <p>From North West/Lea Castle - via Hurcott Lane, Perriford Lane, Waggon Lane, Churchill Lane, Stakenbridge Lane, Mill Lane</p> <p>From North East/Hagley via A456</p> <p>From South/East via B4188 Belbroughton Road/junction with A456</p>
11	<p>Safe pedestrian access to platforms from car park has not been considered</p> <p>No consideration how increased numbers of commuters/drivers will walk over level crossing to access Platform 2 (to Birmingham)</p>
12	<p>Loss of amenity to neighbouring houses due to traffic and pollution.</p> <p>Residents of Station Drive, Lynwood Drive and Mill Lane from traffic, intensification of use of both sites, light and noise pollution, extended hours of use over and above the levels of historic activity on Station Yard</p> <p>Residents of Station Drive, Lynwood Drive and Mill Lane will suffer from</p> <ul style="list-style-type: none"> • increased traffic, • intensification of use of a redundant industrial site • Significantly higher level of vehicle movements compared to when the site was in use as an oil depot and car storage yard (via car transporters) • light pollution • noise pollution • potential anti-social behaviour <p>All during current rail operating hours of circa 06.00 to 23.30 - ie anti-social residential hours in mornings and evenings based in the current rail timetable which we anticipate could be changed to reflect the increased use of the Station</p>

13	<p>Road network in immediate vicinity of sites is inappropriate for such an intensification of use</p> <p>It is designed to primarily serve a small residential area.</p> <p>Lynwood Drive is a cul de sac of circa 35 houses.</p> <p>Lynwood Drive/Station Drive were not designed to cope with 160+ additional vehicle movements per day associated with an 80 space station car park, based on the assumption that the Station Drive entrance to the Yard is unsuitable due to its proximity to the level crossing and the dangers of traffic backing up.</p>
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Data Protection
The information you provide on the form will be stored on a database used solely in connection with the Local Plan. Representations will be available to view on the council's website, but address, signature and contact details will not be included. However, as copies of representations must be made available for public inspection, they cannot be treated as confidential and will be available for inspection in full. Copies of all representations will also be provided to the Planning Inspectorate as part of the submission of the Wyre Forest District Local Plan. By submitting this form you are agreeing to these conditions.
Please see the Councils Data Protection and Privacy statement:
<http://www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx>

By signing this form you are agreeing to The Council's Data Protection Policy above and the storage of your information.

Signature Agreece Date 10th October 2019

Please return the completed form by **no later than 5:00pm on 14 October 2019** to:

Email: LPR@wyreforestdc.gov.uk

Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

Consultation response forms can be completed and submitted online at: www.wyreforestdc.gov.uk/localplanreview

