

A follow up on the consultation forms for the amendments to the Local Plan – and yes, the form is horrible (anyone would think they didn't really want to hear our opinions..). I've had lots of people ask me how it should be filled in: the Parish Council are talking to consultants and perhaps taking formal advice on whether the amendments can be challenged on a legal basis – and I'm no longer a member of the Parish Council, so this post is definitely not on their behalf, but as a concerned resident (who has spent a good too many hours looking at all the documentation and trying to pick a path through it).

So I've gone through the form: Page 1 is very straightforward but essential: name address etc. – make sure that you do fill it in, because the Planning Inspector will **only** consider your comments if this section is complete. Because this is so late in the process, **all** the forms will go to the Planning Inspector.

Page 2 – **Question 3** – again straightforward – if you made a response in the consultation in September / October 2018 and want to retract / amend your remarks then, this is where to include that.

**Question 4:** We're dealing with the Amendments to Pre-Submission Local Plan (July 2019 version), so that's the Yes box to tick.

**Question 5:** Please specify which part of the Local Plan you are commenting on: We're looking at 2 **policies: 36.6 Station Yard, Blakedown, and 36.6A Land off Station Drive, Blakedown** – if you want to comment on both, you'll have to fill out a form for each, and separate out your reasons for objection in answer to Question 7. (Sorry, nobody said this would be easy..). Another approach is to put **36.6/6A** in the **Policy** box, and roll the two together – the WF Guidance Note says you should use one form per topic or issue – but in fact both Station Yard and the field are the same issue for many residents in the village.

**Question 6:** straightforward – support / comment / object – up to you.

**Question 7:** – trickier. For this we have to look at the guidance notes. I definitely am not qualified to say whether this is **legally compliant**, so I'm leaving that bit empty (*but see my comment at the end*) I believe (because it says it in the Plan) that it has been prepared in recognition of the **duty to cooperate** with other authorities (that's why the target number of dwellings to build each year is 300 per year, when the government minimum requirement is 248), so I'll put a Yes in there, but it could be left empty. I think our comments relate to the **Soundness** of the proposals, specifically whether the proposals are **justified** (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence), and to whether they are **Consistent** with national policy (you have to demonstrate a pressing need if you're going to take land out of Green Belt). So I'll be putting a tick in the '**No**' box against **Sound**, and against '**Justified**' and '**Consistent with National Policy**' in **Question 8**.

The box at **Question 9** is to enlarge on these reasons – it's up to you what you want to put in here – please use your own words, don't just cut and paste, it'll be so much more effective if you put your views across in your own way. Discussions I've had with friends and acquaintances in the village have raised lots of different points of concern such as:

**Justified:** The Neighbourhood Plan already provides for small scale development within the village boundary, and on rural exception sites, which will allow for growth whilst preserving the rural nature of the villages, so this development is not justified.

The Housing Needs Survey for Churchill and Blakedown did not reveal any identified need for large scale development in Green Belt land surrounding the village.

The question of access, congestion and safety: there has been no study (or no evidence included in the documentation relating to the Plan) of the effect of such a substantial increase in traffic in the area around the station, Lynwood Drive and Roxall Close, the A456 and Belbroughton Road. The proposals will lead to a dangerous mix at busy times of the day of a large number of vehicles with congested junctions, narrow side roads (1 car wide), pedestrians, school children walking to the station or up to the school, and commuters having to access the Birmingham platform across the level crossing at a time when the barriers are going up and down very regularly. And that's without the problem of vehicles trying to access the car parks through Waggon Lane, Churchill Lane and Mill Lane.

The station car parking needs for Blakedown were identified as a further 10 spaces in all documents relating to the Plan until July of this year, when as a result of a report by SLC, the number suddenly jumped to a further 260 places. There has been no chance to either understand the parameters of the brief against which this report was compiled, or to question the assumptions of the model used. There is significant doubt that the evidence informing this policy was proportionate. There is also significant doubt that – as the potential users will have to pay to park – the car parks will be used to any great extent. (Charging has just started at Hagley Station, and half the parking places are empty).

Where are all these drivers going to come from? There's very low inward migration into Wyre Forest, the population growth is projected to be 4.9% to 105,300 by 2036, of which 60.8% can be expected to be economically active. 59.1% of these work within Wyre Forest, whilst 5.4% of the remainder commute to Birmingham and 5.5% to Worcester. (These are all figures from the Housing Needs Objective Assessment in 2017). These figures just don't relate to the projections from the SLC report.

**Consistent with National Policy:** The original Plan allocated 65 dwellings for development in the rural villages throughout the life of the Plan. The Amendment now allocates 115 dwellings to the same villages. As there is no demonstrable need for large scale development in Blakedown, or in the rural villages of Wyre Forest, this development is purely to help pay for the car park. If the Green Belt is to be used for car parking, there must be compelling evidence that it is necessary. (See above! – don't think I've seen it yet).

However – these are all concerns (and the list is not exclusive, you may have other concerns to include). If you have reasons to support the proposals, of course Question 9 is where you elaborate these.

Page 4, **Question 10.** Again, I'm not qualified to be sure that any amendment I suggest would be legally compliant and sound – but the Plan was presumably compliant and sound before the amendments were made to these two policies, so my suggestion is that if they are removed, the Pre-Submission Plan will revert to being compliant and sound. Those of you with specific knowledge – if you've got anything you could share with the rest of us – please do!!

**Question 11.** The examination will be next year sometime. I would hope that if the Amendments do go through to the Final Version of the Plan that we would ask somebody legally qualified to

represent the interests of the residents. I personally am not intending to ask to speak, but it's your decision. If you tick the Yes box, you'll need to outline your reasons in **Question 12**.

Last but not least, **Question 13** – this last box is at least a bit more relaxed, and you can include here other reasons / concerns that you have. Residents of Lynwood Drive and Station Drive will, I am sure, be concerned about the proposals for Station Yard, the size of the car park (could we start at the 30 spaces already approved and see how it goes before spending well over £1m on a car park which people can't get to, or won't want to pay for? How will you reassure us that screening will be sufficient, lighting won't be intrusive, noise will be kept to a minimum? etc.). There are also environmental concerns – if you're going to build in the Green Belt, how are you going to ensure the protection of the Local Wildlife Site and the stream which feeds eventually into the SSSI at Hurcott Pools.

And **DON'T FORGET TO SIGN IT!** If you're filling it on line, an electronic signature, or put your name in, and the date, to make sure that it's accepted and counted. It has to be returned by 5:00pm on 14<sup>th</sup> October – a deadline which certainly won't be given an extension. Email or post, the addresses are on the form, or some of you may be filling the form in online anyway.

**One final comment** (the one I referred to in Question 7) – I feel we've been a bit short changed here. There was no mention of any of this when the Issues and Options Consultation took place in 2015, nor in the Preferred Options Consultation in 2017, nor in the Pre-Submission Plan Consultation in October 2018. So we've skipped a few steps, and we've been thrown into a major row right at the very last moment. Then when we went to the Drop-In Consultation at the beginning of September, days after the Amendments were published, we were told that these amendments were already decided and that if they weren't included then the whole Wyre Forest Plan would fail because Worcester County Council would oppose it. So was this really a consultation? I'm hoping that the legal eagles will tell us whether this is due process – but it doesn't feel like it at the moment.

Where to start, eh? Hope this has been helpful,

Sue