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| Project: | Bromsgrove District Council –Transport Planning Advice | | |
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| Prepared by: | FJ | Date: | 07/01/2021 |
| Approved by: | TS | Checked by: | OH / PO |
| Subject: | Review of Wyre Forest District Council Local Plan 2016-2036 Matter 11 response dated December 2020 | | |

1 Introduction

A high-level review has been undertaken of the documents supplied to Bromsgrove District Council (BDC) in December of 2020 in relation to Matter 11 of the Wyre Forest District Council Local Plan (WFLP). This review has been carried out to determine if previous concerns raised by BDC have been addressed by additional information provided in recent reports.

The concern raised by BDC is that unfortunately the WFLP does not accord with national planning policy's objectives to promote sustainable transport and actively manage patterns of growth in support of these objectives, it does not provide transport and accessibility measures informed by adequate evidence of the needs of the District and the wider area and there is not a reasonable prospect that the proposed measures and improvement schemes will be provided in a timely manner and will be effective in managing demand and promoting more sustainable travel.

2 Wyre Forest District Council Response to Matter 11

Wyre Forest District Council have responded to concerns raised by BDC and have split question 11 into three sections. The main focus of this initial review has been Q11.1(ii) as this relates to the transport evidence base which underpins the assessment.

The majority of the paragraphs in response to this question (11.1.8 to 11.1.3, 11.1.7 to 11.1.18 and 11.1.21 to 11.1.24) refer to older documents previously reviewed and therefore comments made by BDC still stand.

Paragraphs 11.1.14 to 11.1.16 relate to further analysis provided by Jacobs to demonstrate that the base model used for assessments is fit for purpose. This new document has been reviewed and is discussed in the following section.

Paragraph 11.1.15 states that *“analysis has shown that 97% of count data in the AM and 88% of count data in the PM have not changed significantly between 2011 and 2017/18”*. However, the data used to derive these statistics includes counts outside of the preferred performance criteria set out in the Jacobs' note and for these counts the *“variations would require further justification to demonstrate their acceptability”*. Jacobs have not provided this further justification and therefore the statements made appear to present a more optimistic picture than may in fact be the case.

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Paragraphs 11.1.19 to 11.1.20 refer to the VISSIM reports also provided in December 2020 which illustrate the impact of the local plan proposal in Hagley. A comprehensive review has not been possible given the time available to review these documents, however it is noted that the forecasts of traffic data for future growth have been extracted from the Wyre Forest Transport Model (WFTM). BDC has previously raised concerns about the use of the WFTM and these concerns have not yet been addressed. BDC therefore maintain the view that because the VISSIM model is based on data extracted from the WFTM, any future year forecasts and assessments made are likely to be unreliable.

3 ‘Suitability of data to update Wyre Forest Transport Model’ note by Jacobs December 2020

New analysis conducted by Jacobs has been provided by Wyre Forest District Council and the note submitted aims to demonstrate that the WFTM 2011 base is still fit for purpose. Critically, the note sets out that a Present Year Validation exercise would be carried out, however goes on to state that no new data could be gathered because of COVID 19 pandemic. Therefore, and as an alternative, Jacobs have looked at available data to identify any significant change between 2011 and 2017.

3.1 Justification for 2011 Base

The justification for the WFTM 2011 base being fit for purpose comes from new TAG issued in May 2020, which states that the five-year cut off for count data is no longer used. TAG sets out “...*there may have been little change and older data may be acceptable. Changes such as the closure or opening of a major retail centre or major transport infrastructure such as a new bypass would be expected to result in the need to collect and use more recent data*”.

In the Jacobs note it justifies no employment change by explaining there is minimal overall change in hectares of employment land. However, it then shows that there have been a number of site closures and at least 12 significant new developments since 2011. The change in employment type and location is likely to impact the number of trips and the travel patterns. These facts are reasonable justification to undertake new surveys as recommended by TAG.

In addition, the Hoobrook Link Road has been built since 2011 and is a sufficiently significant highway scheme to have had an appreciable impact on traffic routing in the area. This scheme has been coded into the model, but the rerouting of traffic in the model has not been validated and new developments on the link road have not been included. Again, following the TAG guidance noted by Jacobs, new surveys should be undertaken to revalidate the model given these significant local changes.

3.2 Traffic Count Data

A review of existing traffic data has been undertaken by Jacobs to determine if it can be shown there is little difference in traffic levels and patterns between 2011 and 2017. Seven locations were found where surveys were conducted for longer than one day, leaving gaps on significant routes that do not have any suitable data which can be compared to data gathered in 2011.

Counts taken from DfT sources were also used, but again these were conducted on one day. A number of the counts used are in locations that are not relevant to the area of study and could be excluded.

The overall figures used by Jacobs show that generally the counts in 2011 match those in 2017. More detailed analysis of this data reveals that when the urban areas such as Kidderminster is considered that this conclusion does not hold true.

BDC therefore does not believe that this new information submitted demonstrates that the 2011 model is fit for purpose and maintains the concerns raised.

4 Conclusion

After a high-level review of the information received in December 2020, BDC unfortunately remain unconvinced that previous concerns raised about the transport evidence base have been answered and the points of concern raised still stand.