

STATEMENT OF REPRESENTATIONS

WYRE FOREST DISTRICT LOCAL PLAN 2016-2036

RESPONDING TO WFDC RESPONSE PAPER

MATTER 11: TRANSPORT AND ACCESSIBILITY

RURAL WYRE FOREST

MARMARIS INVESTMENTS LTD

REPRESENTATION REF: 1188945

1 Proposed Rail Related Car Parking Forecasts

The WFDC statement summaries the position as follows,

- i. Blakedown is one of only two national railway stations within Wyre Forest District.
- ii. At present there are 11 parking spaces provided at Blakedown station (together with on street parking problems).
- iii. Blakedown has good levels of rail service to Kidderminster, Worcester, and Birmingham.
- iv. In 2018/19 150 return passengers per day used Blakedown Station (many more than the 11 spaces would support).
- v. Pre COVID a 29% increase in passenger growth was predicted for Blakedown station between 2019-2036, an additional 44 passengers per day.
- vi. Addressing the backlog of under provision of spaces and accommodating this increase requires 601 parking spaces at the 2 railway stations (pre COVID).
- vii. A suppressed COVID affected requirement at Blakedown is 125 station related spaces which assumes COVID has a permanent reduction of 30% in demand for rail use over the plan period (the study considered a range of demand reductions from 5% to 30%).

2 Proposed Car Park Provision at Blakedown

- a. The Plan allocates land to the south of Station Drive for car parking (Callow Oils site) for circa 111 spaces. This will result in slightly below the worst-case scenario requirement of 125 spaces (assuming the 11 current spaces remain).
- b. The Council propose to “safeguard” part of the Marmaris site for further station related car parking *“if demand in the future justify the additional parking being required”*.
- c. The Council propose to achieve this by the creation of a new policy, *“POLICY 36.6A LAND OFF STATION DRIVE, BLAKEDOWN (WFR/CB/3)”*, and further amendments to existing *“POLICY 36 WFR/CB/3 LAND OFF STATION DRIVE BLAKEDOWN”*

3 Response to proposed Policy 36.6A Land off Station Drive, Blakedown 9WFR/CB/3)

- a. We fail to see the necessity for this additional policy.
- b. The matters raised in this policy are already covered in the existing policy in the submitted plan (as suggested to be amended) for the site.
- c. As such we consider **this proposed policy be not introduced into the Plan** as it is repetitious and unnecessary.

4 Response to proposed amended Policy 36 WFR/CB/3 Land Off Station Drive Blakedown

- a. The policy wording proposed for safeguarding the parking land requires a plan which is not supplied. In any event, the safeguarding is not required nor justified.
- b. New point 10 requires station parking on the site to be brought forward following the provision on the Callow Oils site and then only if future demand *“justifies it”*. This is vague and not justified because,
 - i. There is no published or understood programme for the development of the Callow Oils site for parking, no application has been submitted to ensure it is acceptable in principle.
 - ii. The mechanism for re-assessing future demand or the timetable for such re-assessment is unknown.
- c. As such the safeguarding of an unspecified area of land for an undefined period in an area of high housing demand and need is not justified nor acceptable. It fails the basic tests for plans to be positively prepared, justified, effective and is not consistent with national policy which seeks to avoid the unnecessary sterilisation of land which could otherwise be used effectively.
- d. As such we consider **references to indefinite safeguarding be deleted from the policy** and wording in line with our previous suggestions applied.