



- 1.1 This note has been prepared by David Tucker Associates in response to further transport evidence submitted in December 2020 prepared by Jacobs in advance of the Wyre Forest Local Plan Examination in Public. This report reviewed the suitability of the traffic data in the Wyre Forest Transport Model used to inform the evidence base for the Local Plan.
- 1.2 The Wyre Forest Transport Model uses 2011 base data to inform an assessment which is now nearly 10 years old. Current guidance requires that any models over 5 years old require a present year validation.
- 1.3 Jacobs have therefore compared the 2011 base data with various data sources between 2016 and 2019 across a number of links. The results show significant differences with at least a 15% change identified on 45 of the 74 links compared (61% of total links). For the majority of links there are differences of at least 5%, which is considered significant.
- 1.4 Notwithstanding the overall conclusions Jacobs reach on the appropriateness of the model, there is clearly, cumulatively, a significant risk that the differences alter the outcome of the model without re-running it using the revised current / present data. There are some reductions in flow, however this could have a negative disproportionate impact on certain areas tested in the model.
- 1.5 Overall, therefore, the Jacobs report highlights there are significant differences in the 2011 base data compared to present forecasts which are likely to have an impact on the overall dynamic of the model. The model should be re-run using more recent data sources. At present it does not provide a sound evidence base to assess the Local Plan proposals.
- 1.6 Furthermore, even if the model was to be updated using the more recent base traffic data, this would not address the concerns highlighted in previous transport representations (set out in the planning matters statement (response to ED16) submitted by RCA Regeneration Ltd on behalf of Barberry), that the model does not provide an overall sound evidence base. The reasons are set out as follows:

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1.7 NPPF sets out the requirements of the wider transport and accessibility objectives of Government Policy at Section 9. The interpretation and implementation of these Policy requirements are confirmed in the National Planning Policy Guidance Notes. The most pertinent elements of the requirements are summarised below:

“It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan. A robust transport evidence base can facilitate approval of the Local Plan and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector.”

Para 001

The key issues, which should be considered in developing a transport evidence base, include the need to:

- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms
- assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- highlight and promote opportunities to reduce the need for travel where appropriate
- identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate
- consider the cumulative impacts of existing and proposed development on transport networks
- assess the quality and capacity of transport infrastructure and its ability to meet forecast demands
- identify the short, medium and long-term transport proposals across all modes

The outcome could include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole.

Para 003

1.8 Paragraph: 004 Reference ID: 54-004-20141010 goes onto to confirm that assessment should be undertaken at every stage of Local Plan progression thus:

- as part of the initial evidence base in terms of issues and opportunities
- as part of the options testing
- as part of the preparation of the final submission

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1.9 Following this review, Paragraphs 008 -010 set out a comprehensive and thorough assessment process to ensure appropriate evidence to support any allocation, which provides full consideration of all transport related implications including accessibility, highway safety, amenity and traffic impacts. Specifically, Paragraph 010 encourages the use of WebTAG to assess the development. For transport schemes, the approach requires as a fundamental starting point the need to identify objectives. In the context of a local plan that objective would be to determine the appropriate location and scale of housing allocation.

1.10 WebTAG would then require an assessment of all the possible alternatives to meet these against the key criteria of Environment, Social, Economy, and Public Accounts. The Guidance on WebTAG is clear that

There must be a clear rationale for any proposal and it must be based on a clear presentation of problems and challenges that establish the 'need' for a project.

There must be consideration of genuine, discrete options, and not an assessment of a previously selected option against some clearly inferior alternatives. A range of solutions should be considered across networks and modes.

There should be an auditable and documented process which identifies the best performing options to be taken forward for further appraisal.

There should be an appropriate level of public and stakeholder participation and engagement at suitable points in the process. In most cases this should inform the evidence-base which establishes the 'need' for an intervention, guide the option generation, sifting and assessment steps, as well as informing further appraisal in Stage 2.

Para 1.1.5

1.11 The process therefore requires firstly an assessment of the need for any scheme (in this case housing allocations), then to identify potential options to meet that need, and then finally to confirm whether it would meet the scheme objectives. The purpose of the output is that the process should be transparent and allow proper consideration of alternatives to be considered, by overall economic performance, against the benefits and dis-benefits of each option.

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- 1.12 The transport evidence base to inform the previous pre-submission Draft Local Plan was undertaken in October 2018 by Jacobs. This post-dated the Wyre Forest Infrastructure Delivery Plan (IDP) which was wholly flawed as the transport evidence base should inform the IDP. Furthermore, the model did not include all allocated sites as it had applied zero houses to Policy area OC/13(N) whereas it has a capacity in the Local Plan of around 1,100 houses. There were also significant concerns with the date of the baseline traffic counts being 2011 and approaching 10 years old.
- 1.13 A revised transport evidence base dated June 2019 has been undertaken. This still uses the 2011 baseline which could be considered unrepresentative of local conditions. It refers to the IDP, however the conclusions of the modelling report state:
- “The Urban areas of the Wyre Forest District already suffer from queues and delays creating unreliable journey times. The additional growth identified within the emerging Local Plan Review will clearly add to delays. Chapter 3 of the Wyre Forest Infrastructure Delivery Plan identifies the measures proposed to help mitigate this impact.”
- 1.14 This confirms one of the previous errors with the modelling report and it is clear that the 2019 transport evidence base has also not informed the 2019 IDP and therefore the process remains fundamentally flawed.
- 1.15 The model does not extend to surrounding areas of Hagley and Bromsgrove, both of which currently experience significant congestion, although it is stated in section 15 that improvements to the A456 and Hagley such as a bypass may be required to accommodate growth. It refers back to the Chapter 3 of the IDP which states that it is not appropriate to be included. This further cements that the fact that the process has not been followed in the correct order. Since the submission, a Transport Demand Report has been prepared for Hagley (January 2020), however short of setting out the proportion of total trips passing through Hagley, there is no modelled assessment of the overall impact.
- 1.16 A Corridor Study has been prepared for the key junctions on the A450, however this is a stand-alone assessment and does not consider the impact on the district as a whole. Furthermore, there are a number of schemes identified within this document

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with a requirement for third party land, which raises concern over their potential delivery.

- 1.17 It is clear that the process undertaken by Wyre Forest to identify and test the appropriate level and location of development for the local plan was, and is, wholly flawed.
- 1.18 At present there is no sound evidence base which directly supports the deliverability of the Plan in transport terms.
- 1.19 That is wrong and runs contrary to the purpose of the process which is to allow proper consideration of alternatives to be assessed, by overall economic performance, against the benefits and dis-benefits of each option.
- 1.20 Even if the approach was considered appropriate, at present the Local Plan evidence base provides no detail of what schemes are required to mitigate the impact. There is no detailed modelled assessment which demonstrates the scale of development in the IDP is adequate. The conclusion of the modelling report is that the measures included “help” mitigate the allocations. This clearly falls well short of the tests set out in the NPPF section 9.
- 1.21 The Local Plan does not take a justified and suitably evidenced based approach to strategic transport, infrastructure and delivery. The Local Plan is not consistent with national policy in this regard and will not be effective in terms on its implementation.