## Bromsgrove District Council Planning Committee

# Committee Update 1 31 October 2019

**Application Number:** 16/1132

Site Address: Land at Whitford Road/Albert Road, Bromsgrove

### **Further Representations**

### 30 additional representations received objecting to the scheme

No new matters or issues raised above those contained in the published report.

#### **Mott Macdonald (MM)**

(Acting as Transport Planning Advisors to Bromsgrove District Council)

Technical Note received 25 October 2019

- Whitford Vale Voice (WVV) have provided a further letter of objection which sets out 19 themes of objection, summarising and providing additional comment on a range of points that have been made previously in WVV Technical Notes 1-49.
- This Technical Note provides a response to each of the 19 themes of objection.
- This report provides a commentary on the issues noted in:
  - WVV Letter of Objection (12 October 2019);
  - WVV Technical Note 48 (Development Impact on Catshill: October 2019); and
  - WVV Technical Note 49 (TEMPro Growth Logic Check: October 2019).
- It identifies where objections have been responded to previously and provides further information or comments as necessary. The report also presents comments on new matters.
- The structure of this report presents each point made by WVV in full followed by the MM response.

A full version of this document is available on the District Council website under the document tab relating to the application (16/1132):

https://publicaccess.bromsgroveandredditch.gov.uk/online-applications/

#### **The Bromsgrove Society**

Comments received 24 October 2019

### Objection

#### **Historical Aspect**

- The Society supports the Conservation Officer's assessment of the merits of adding the Greyhound Inn to the Council's Local Heritage List.
- The Society also supports retention of the Greyhound Inn building
- If the Planning Committee were to approve the Application;
  - 1. It is the expectation of The Society that full historical and environmental investigation and recording of The Greyhound Inn site be conditioned; and;
  - 2. The Society consider a condition that the building stone used in the Greyhound Inn and surrounding retaining walls be recovered for reuse in retaining walls or other landscaping features at the Greyhound Inn and / or Whitford Road sites would be appropriate.

#### Impact of Development on Highways

- 1. The Applicant's Whitford Road site access drawing shows that at the southernmost access junction, visibility to the right for drivers exiting the proposed development does not meet the required standard;
- The Applicant's Whitford Road site access drawing shows an informal crossing point on Fox Lane with restricted visibility for pedestrians attempting to cross the road. Unaccompanied school children will be particularly vulnerable at this location;
- 3. Worcestershire Highways have not requested the Applicant undertakes the Road Safety Assessment necessary to demonstrate that safe access and egress can be achieved for motorised traffic, cyclist and pedestrians at the Whitford Road site:
- 4. No vehicle tracking evidence has been provided to demonstrate that vehicles can achieve safe access and egress to the Greyhound Inn site when cars are parked opposite the proposed entrance. This is frequently the case due to high demand for on-street parking in Albert Road;
- Worcestershire Highways have not requested the Applicant undertakes the Road Safety Assessment necessary to demonstrate that safe access and egress can be achieved for motorised traffic, cyclist and pedestrians at the Greyhound Inn site;
- 6. The Applicant has not demonstrated that on-site parking standards for residents and visitors can be met for up to 15 dwellings at the Greyhound Inn site;
- 7. The Society recognises that the Applicant's trip distribution makes use of an industry standard census journey to work methodology. However, due to the concentration of schools accessed from the Rock Hill / Worcester Road / Hanover Street corridor (Millfields 1st, St Peter's 1st, St John's Middle, South Bromsgrove High & Bromsgrove School), reliance on this distribution methodology alone fails to take account of likely very significant southbound generation of pupil escort trips by car from the Whitford Road site. Consequently The Society considers that for the Whitford Road site the Applicant's highway impact assessments for any vehicle trips that route along Fox Lane north of the

- Millfield Road/Sunningdale Road mini-roundabout cannot be regarded as being sufficiently robust during the morning peak hour;
- 8. A residential driveway and a parking space at the side of the shop will have direct access to the proposed Rock / Hill roundabout. Any vehicle using a forward gear to enter the parking space at the side of the shop will have to reverse directly onto the roundabout;
- The so called "detailed design" drawing for the proposed Rock Hill / Fox Lane roundabout that Worcestershire Highways ask BDC to condition under a Section 278 agreement is labelled "to be treated as indicative and is for discussion purposes only";
- 10. The gradients in Rock Hill and Fox Lane make the junction a challenging location to construct a roundabout that meets relevant design standards. Drainage and the potential for surface water turning to ice are also concerns. Consequently the Section 278 conditioned "indicative" design drawing may require changes. The Society question how Worcestershire Highways will be able to enforce design changes if outline planning consent is granted to build the roundabout to the agreed drawing;
- 11. Construction of the proposed Rock Hill / Fox Lane roundabout requires the removal of parking spaces outside the Select and Save Convenience Store which is likely to have an impact on turnover and consequently the viability of the shop. Removal of the parking spaces requires Traffic Regulation Order (TRO) approval. Such approval cannot be guaranteed, if the TRO is not approved the roundabout scheme could not be delivered and occupation of dwellings at the Greyhound Inn site and occupation of dwellings and a convenience store at the Whitford Road site would be unlawful;
- 12. The Applicant's assessment of the impact of development traffic at the proposed Rock Hill / Fox Lane roundabout does not take account of observed high frequency use of the signal controlled pedestrian crossing during the morning peak hour, 50 operation in that time according to Worcestershire Highway, and consequential blocking of the roundabout;
- 13. The Applicant claims that the proposed Rock Hill / Fox Lane roundabout will reduce queueing and delays in Fox Lane and the number of vehicles wanting to route through Millfields but doesn't state by how much. If the Applicant is incredibly lucky and everything works just as they hope then the number of cars no longer rat running through Millfields has to be equal to the number of new cars from the Whitford Road development wanting to drop children off at the nursery and First School in Millfields or rat run through Millfields to avoid queues at the Rock Hill / Fox Lane junction and Charford Road roundabout. Otherwise there is either an unmitigated impact on Millfields or additional impacts on both the Rock Hill / Fox Lane junction and the Charford Road roundabout that have not been accounted for in the capacity assessments for these junctions;
- 14. The Society consider that it is unacceptable to reduce the width of the footway adjacent to the Charford Road roundabout when this junction is located in Worcestershire's latest Local Transport Plan Rock Hill / Worcester Road Key

- Corridor of Improvement which includes as a deliverable objective "to support enhanced accessibility by walking";
- 15. The proposed traffic light scheme at Perryfields Crossroads does not meet accepted standards;
- 16. The Applicant's assessment of the performance of the proposed Perryfields Crossroads traffic light scheme is that during morning peak hour the Kidderminster Road West arm, the Whitford Road arm and the junction as a whole will have Degrees of Saturation (DoS) above 90.0%. DoS values above 90.0% are deemed to be unacceptable.
- 17. Mott MacDonald consider that the main route from the Whitford Road Site to M42 Junction 1 and M5 Junction 4 is through the Town Centre but the Applicant's modelling for their proposed Waitrose mini-roundabout improvement scheme does not include this traffic:
- 18. Worcestershire Highways request a Section 106 contribution towards improvements to the Waitrose mini-roundabout but it is unclear what scheme will be delivered. The value of the contribution suggests it may be the IDP traffic signal scheme that the Waitrose application showed was unacceptable, it could be the Applicant's mini-roundabout improvement scheme that hasn't been correctly modelled or it could be some other scheme yet to be subject of an impact assessment and public scrutiny. The Society consider that this uncertainty is unacceptable;
- 19. The Society welcomes that Worcestershire Highways request a Section 106 contribution towards improvements to the St John Street / Market Street junction. However we are concerned that the details of the proposed improvement scheme have not been made available nor is a capacity assessment available to demonstrate that the proposed scheme will appropriately mitigate the impact of development traffic;
- 20. The Parkside junction in the Town Centre is regarded as currently operating over capacity. The Society are extremely concerned that while Mott MacDonald consider that the main route from the Whitford Road Site to M42 Junction 1 and M5 Junction 4 is through the Town Centre and there are proposed planning obligations to mitigate the impact of development at the Waitrose miniroundabout and St John Street / Market Street junction that no assessment of the impact of development has been made at the Parkside junction to determine the improvements necessary to mitigate the impacts of development;
- 21. The Applicant's modelling of the Stourbridge Road / Perryfields Road junction is based on the false premise that vehicles can pass on the left of vehicles waiting to turn right from Stourbridge Road into Perryfields Roads;
- 22. The Society are very concerned that development impact assessments have been made for the Stourbridge Road / Perryfields Road and Stourbridge Road / Barnsley Hall Road junction on the basis that more than 100 Whitford Road development vehicle trips will route through each junction but no impact assessment has been made for the Stourbridge Road / Meadow Road /

- Westfields junction when there will be more than 100 Whitford Road development vehicle trips will route through this junction too;
- 23. There is no footway on Whitford Road north of its junction with Echells Close. Mott MacDonald has requested that the Applicant considers options to prevent or discourage pedestrians from using this section of Whitford Road. The Applicant offers no proposal on this matter; and;
- 24. Following the cessation of the number 98 bus service the closest bus stops to the centre of the Whitford Road site are 900m away in Rock Hill and 1000m away in Kidderminster Road. Bromsgrove Development Plan Policy BDP5A.7(d) requires a bus service to connect the Whitford Road site to the Town Centre and the railway station. Although WCC suggest a Section 106 contribution to an "intended" bus service, no route has been defined for the service nor has the frequency of service been set consequently there is no guarantee that Policy BDP5A.7(d) will be met.
- On the basis of the points raised above insufficient information has been provided to convince The Society that the impact of development at the Whitford Road and Greyhound Inn sites on highway safety, ease of movement and congestion will not be severe.
- The National Planning Policy Framework does not support schemes that would have severe transport impacts, nor those whose impacts have not been fully assessed. Consequently The Society rightly consider that Application 16/1132 for up to 490 dwellings and a convenience store at site A (Land off Whitford Road) and up to 15 dwellings at site B (Land off Albert Road) should be refused.

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