BROMSGROVE DISTRICT COUNCIL

VIRTUAL MEETING OF THE PLANNING COMMITTEE

TUESDAY 16th March 2021
AT 6:00P.M

UPDATE SHEET No.1

16/0335 - Perryfields

Further Representations

Please see the website for original copies of the representations

WCC Highway Authority

There are three schemes which Taylor Wimpey have proposed as part of the Planning Application which are contained within the Transport Assessment. They include drawings and Road Safety Audit Stage 1. These are not included as part of the Town Centre Junctions nor the BREP (A38) junctions. These are separate works which should be secured by Planning Condition. In the formal highway response dated 4th November, it states these should be delivered by **either** S106 contribution **or** S278 via a planning condition.

For clarity, this does not change the levels of contribution nor the strategy.

Therefore the following conditions are proposed:-

1. HIGHWAY IMPROVEMENTS / OFFSITE WORKS / SITE ACCESS
   No more than 100 dwellings of the development hereby approved shall be occupied until the highway improvements works comprising: -
   - Improvements at the Church Street/ Market Street junction in general accordance with drawing 173050B-A11
   - Improvements at the Worcester Road / Shrubbery Road junction in general accordance with drawing 173050B-A12

   Have been constructed and completed.

   Reason: To ensure the safe and free flow of traffic onto the highway

2. HIGHWAY IMPROVEMENTS / OFFSITE WORKS / SITE ACCESS
   No more than 325 dwellings of the development hereby approved shall be occupied until the highway improvements works comprising: -
   - Improvements at the Stourbridge Road / Westfields (Catshill) roundabout in general accordance with drawing 173050B-A03

   Has been constructed and completed.
   Reason: To ensure the safe and free flow of traffic onto the highway

Whitford Vale Voice

In response to the Officer's report to the planning committee meeting scheduled for Tuesday, 6th March 2021, WVV clarify below our concerns regarding the above planning applications.

WVV has previously submitted to the Local Planning Authority (LPA) our initial comments in respect of the Perryfields and Greyhound Inn planning applications, whereby WVV have received replies from other parties in respect of our comments. Following a review of the responses made to WVV's comments **Table A,** below, identifies the matters that still remain of concern.

Table A: Summary of the remaining concerns.

WVV Ref.	Remaining WVV Concerns	Consequences
A1	Non-residential trip rates are not representative of local levels of car ownership.	Suppression of the non-residential development vehicle trip generation used as an input for the traffic modelling.
A2	Nearly half of the TRICS donor sites used to generate the B1 Office land use vehicle trip rates had workplace travel plans in place.	Suppression of the non-residential development vehicle trip generation used as an input for the traffic modelling.
A3	The internalisation of residential vehicle trips for the purpose of travelling to work appears to be overstated while the distribution of vehicle trips for the purpose of travelling to work to the areas of MSOA's Bromsgrove 010 (Sidemoor) and Bromsgrove 011 (Bromsgrove Central & Sanders Park) appears to be understated.	Suppression of the residential development vehicle trip generation used as an input for the traffic modelling.
A4	Whilst the personal travel planning target to reduce single occupancy car trips by 12% may be achievable an incorrect assumption has been made that all residential vehicle trips will be single occupancy.	Suppression of the residential development vehicle trip generation used as an input for the traffic modelling.
A5	The committed developments included within the appellant's traffic modelling do not appear to have been updated since the Transport Assessment dated December 2017 was submitted.	Suppression of committed development traffic flows used as an input for traffic modelling will lead to a wrong baseline level of background traffic on the network.
A6	Traffic modelling omits 72 vehicle trips during the AM Peak hour and 42 vehicle trips during the PM Peak hour from the committed Whitford Road Town Expansion Site.	Suppression of committed development traffic flows used as an input for the traffic modelling.
A7	The Paramics traffic model does not include Windsor Street in the Town Centre as a through route.	Traffic modelling is not representative of existing and future year traffic flows in the Town Centre.

A8	The Paramics traffic model does not include the Kidderminster Service Road / Carol Avenue / Cherry Orchard Drive link between A448 Kidderminster Road and Willow Road.	Traffic modelling is not representative of existing and future year undesirable rat-running traffic flows in the Sidemoor Residential Area.
A9	The appellant has not provided diagrams showing forecasts of future traffic flows across the local highways network.	The local community and Decision Makers are unable to perform logic checks on the assignment of development vehicle trips to the local highway network. The local community and Decision Makers are prevented from understanding the impact of development on undesirable rat-running in residential streets.
A10	The appellant's journey time analysis does not show the impact of development at the Perryfields site on journeys that route along Charford Road.	The local community and Decision Makers are prevented from understanding the impact of development on journey times on a key link between residential areas and the Southeast Bromsgrove Employment Area.
A11	The positioning of cameras for the purpose of measuring queue lengths and delays was such that at some locations the rear of true typical queues could not be observed.	Junction models may not be appropriately validated against existing queues and delays.
A12	Whilst improvements to the Rock Hill / Fox Lane junction may improve the ratio of flow to capacity of the Fox Lane arm and influence the number of southbound drivers in Fox Lane who may choose not to rat-run through Millfields, drivers when rat running through Millfields are also doing so to avoid delays at the Rock Hill / Worcester Road / Charford Road junction.	Appreciation of the reasons why drivers route through Millfields is essential in understanding the potential impact of development on the Millfields Residential Area.
A13	Drivers also rat-run from Worcester Road through Millfields to the Fox Lane / Millfield Road / Sunningdale Road roundabout.	Appreciation that there are existing two-way rat running trips through Millfields is essential in understanding the potential impact of development on the Millfields Residential Area.
A14	The appellant does not provide traffic flow diagrams to inform the local community of the net change in rat-running vehicle trips through Millfields following development and the implementation of proposed mitigation strategies.	The local community and Decision Makers are prevented from understanding the impact of development on undesirable rat-running through the Millfields Residential Area.
A15	The loss of parking spaces in the Rock Hill layby and the impact on passing trade at the Rock Hill convenience store.	The Rock Hill convenience store may no longer be viable leading to the loss of a valued local amenity.

A16	The loss of parking spaces in the Rock Hill laybyand the impact on the safety of deliveries made to service the Rock Hill convenience store.	The absence of a parking space at the front of the store capable of accommodating deliveries currently made using lorries of 18 tonne gross vehicle weight is likely to have an adverse impact on road safety.
A17	Compromises made to road safety at the Rock Hill / Fox Lane junction arising from the departures from standard required to deliver the proposed junction improvement scheme.	The cumulative impact of the numerous departures from standard required to deliver the proposed junction improvement scheme in thisconstrained location with challenginggradients may be regarded as having an unacceptable impact on highway safety. There are only so many departures from standards before a scheme becomes unsafe.
A18	The Local Highway Authority do not regard the proposed junction improvements at the Rock Hill / Fox Lane junction to be a long term solution for the important B4091 route from the A38 to the Town Centre.	It appears to WVV that a further land take will be required at the junction to accommodate additional demandson the highway network arising fromthe allocation of land for development still to be allocated in the District Plan Review and subsequent District Plans.
A19	The appellant states *"active frontages, pedestrian crossing points, losenges, buildout, school zones and changes in surfacing will be designed into the layout of the spine road to encourage lower vehicle speeds and deter off-site through traffic from using the spine road".* In addition to the above measures, on-street parking along the proposed Perryfields spine road will also deter its use as an off-site through route.	The appellant fails to inform the local community and Decision Makers of the alternative routing for through traffic, or the quantum that will be deterred from using the proposed spine road as a through route between A448 Kidderminster Road and B4091 Stourbridge Road.
A20	The existing Perryfields Road is a signed routethat currently serves the purpose of distributing traffic around the West of Bromsgrove and reducing congestion in the Town Centre.	It appears to WVV that the components of the local highway network that will be used by the off- site through traffic, deterred from using the proposed spine road, will bethe Sidemoor residential areas, All Saints Road / Victoria Road and the Town Centre.
A21	The appellant fails to identify in the main text of their TA the current traffic flows in Perryfields Road and the proportion of such flows that represent through traffic, traffic accessing existing properties in Perryfields Road and traffic accessing educational establishments in Perryfields Road.	It appears to WVV that the information available to the local community and Decision Makers on Perryfields through traffic is restrictedto the WVV traffic survey undertaken in February 2015 which revealed during the AM Peak Hour that 74% of northbound vehicle trips along Perryfields Road. In effect as much as 256 off-site through trips will be diverted on to other parts of the highway network..

A22	The appellant fails to identify the through trips on the Perryfields Spine Road arising from the committed Whitford Road development.	The Whitford Road TA identifies 109 two-way through trips in the AM Peak Hour and 115 such trips in the PM Peak Hour using the Perryfields Spine Road. This traffic will be deterred from using this route and will use alternative unidentified routes.
A23	WVV have been unable to verify that the Perryfields spine road has been modelled with the speed attribute for the link set at an appropriate speed to reflect the proposed traffic calming measures designed into its layout to encourage lower vehicle speeds.	If the speed attribute for the spine road link has not been set at an appropriate speed the appellant's modelling will not appropriately replicate the reassignment of off-sitethrough trips to the Town Centre andresidential streets.
A24	The indicative masterplan shows that there will no longer be a through route across Perryfields between King Edward Road and A448 Kidderminster Road.	It appears to WVV that the closure ofthe King Edward Road to Kidderminster Road through route will lead to an undesirable increase intraffic through the Sidemoor residential area.
A25	Paragraph 8.124 of the Bromsgrove District Plan states *"in order to reduce congestion and improve air quality in the Town Centre, wherever possible, through traffic will be routed via alternative less congested routes".* It appears to WVV that the impact of development at the Perryfields site on the Town Centre is the consequence of two distinct aspects of the appellant's proposals. Firstly the additional demand on the highway network arising from the development itself and secondly traffic that will reroute through the Town Centre as a consequence of the proposed Perryfields spine road being designed to discourage off-site through traffic from using the spine road. With regards to the additional demand placed on highways within the Town Centre, WVV note that paragraph 8.124 of the Bromsgrove District Plan states *"in order to reduce congestion and improve air quality in the Town Centre, wherever possible, through traffic will be routed via alternative less congested routes".*	It appears to WVV that the appellant's proposal to deter external through traffic from using the proposed Perryfields spine road would increase traffic flows in the Town Centre. As such, the proposal to discourage traffic from using the spine road as a less congested through link between Kidderminster Road and Perryfields Road is contrary to the strategy identified in the District Plan to reduce congestion and improve air quality in the Town Centre by routing traffic through alternative less congested links.

WVV note from Paragraph 7.9 of the appellant's Transport Assessment (TA) dated December 2019that Assessment Scenario 7 includes 'cumulative developments' with these identified in Paragraph 7.117 as being Whitford Road (planning application reference 16/1132) and Foxlydiate (planning application reference 16/0263) that where still to be decided at the date of the TA's submission tothe LPA.

Subsequently, prior to the Committee Meeting, development at the Foxlydiate cross boundary site has been approved by Bromsgrove District Council and Redditch Borough Council. Furthermore, after the Appeal start date, on 9th February 2021, outline planning permission was granted on appeal at the Whitford Road site. Consequently, Assessment Scenario 7 is now the required scenario when considering the impact of development at the proposed Perryfields site on the local highway network.

Table B below identifies matters that are of concern now that the Whitford Road and Foxlydiate sites are committed developments (Assessment Scenario 7).

Table B: Summary of WVV concerns arising from the necessity to reclassify the Whitford Road and Foxlydiate sites as committed developments (Assessment Scenario 7).

WVV Reference	New WVV Concerns	Consequences
B1	Paragraphs 7.15 to 7.33 of the TA provide detailed journey time analyses for Assessment Scenario 4 and in doing so adopt a model presentation format for sharing information on the impact of development and mitigation strategies with the local community and Decision Makers. In contrast, for the required Assessment Scenario 7, paragraphs 7.117 to 7.119 of the TA do not provide detailed journey time analyses.	The local community and Decision Makers are prevented from understanding the impact of development on journey times and making informed judgements on the impact of development on the local highways network following implementation of the proposed mitigation strategies.
B2	Paragraphs 7.33 to 7.101 in providing individual junction impact assessments covering all junction arms for Assessment Scenario 4 adopt a model presentation format for sharing information on the impact of development and mitigation strategies with the local community and Decision Makers. In contrast, for the required Assessment Scenario 7, paragraphs 7.117 to 7.119 of the TA do not provide individual junction impact assessments covering all junction arms.	The local community and Decision Makers are prevented from understanding the impact of development at individual junctions and making informed judgements on the efficacy of the proposed junction improvement schemes.
B3	The appellant has not provided diagrams for Assessment Scenario 7 showing forecasts of future traffic flows across the local highways network.	The local community and Decision Makers are prevented from understanding the impact of development on undesirable rat- running in residential streets.

WVV has reviewed the consultation response from the Local Highway Authority dated 4th November 2020. Concerns arising from Worcestershire County Council's comments on mitigating the impact of the Perryfields development at key junctions in the Town Centre are shown in Table C below.

Table C: Summary of WVV concerns arising from the County Council's consultation response on highway and transportation matters dated 4th November 2020.

WVV Reference	New WVV Concerns	Consequences
C1	The Local Highway Authority has secured funding to improve the A448 Market Street / B4091 Stourbridge Road / Birmingham Road / A448 The Strand (Parkside) junction. Details of the proposed improvement scheme where placed into the public domain by Worcestershire County Council (WCC) for the Cabinet meeting held on 22nd October 2020. Details of the proposed improvement scheme have not been submitted for consideration by the Decision Makers nor has the local community been afforded an opportunity to comment on the scheme. Neither the LPA nor the Local Highway Authority has requested that the appellant assesses the impact of development at the Perryfields site on the Parkside junction following implementation of the proposed County Council's junction improvement scheme.	There is no evidence available for the local community or the Decision Maker to judge if the County Council's improvement scheme at the Parkside junction will mitigate the impact of development at the Perryfields site in terms of capacity, congestion and highway safety.
C2	The Local Highway Authority is seeking a contribution from the appellant for the purpose of making improvements promoted by them to the A448 St John Street / A448 Market Street / St John Street (BirdBox) junction. The Infrastructure Development Plan (IDP) identifies a signalisation scheme to improve the junction. The combined Section 106 contributions from the appellant and the Whitford Road applicant is equal to the sum identified in the IDP for the signalisation scheme, but have not been updated to reflect increases in construction costs since publication of the IDP in February 2014. Neither the LPA nor the Local Highway Authority has requested that the appellant assesses the impact of development at the Perryfields site on the BirdBox junction following implementation of the IDP junction signalisation scheme or any other scheme that may be promoted by the County Council.	There is no evidence available for the local community or the Decision Maker to judge if the Local Highway Authorities IDP signalisation scheme, or any other County Council promoted scheme, at the BirdBox junction will mitigate the impact of development at the Perryfields site in terms of capacity, congestion and highway safety.

C3	The Local Highway Authority identifies in their consultation response, dated November 2020, that the appellant's submitted designs to improve the A448 Kidderminster Road /A448 Market Street / B4091 Hanover Street (Waitrose) junction could, not will, address anyresidual impacts of development at the Perryfields site. Given the absence of a junction impact assessment covering all junction arms for Scenario 7 in the main body of the appellant'sTA it is not clear to WVV if the above judgement by the County Council is applicableto Scenario 7. The Local Highway Authority expresses their desire to address the combined impacts from the Perryfields and Whitford Road Town Expansion Sites. To do this the County Council is seeking a contribution from the appellant forthe purpose of making improvements promoted by the County Council to the Waitrose junction. The Infrastructure Development Plan (IDP) identifies a signalisation scheme to improve the junction. The combined Section 106 contributions from the appellant and the Whitford Road applicant is equal to the sum identified in the IDP for the signalisation scheme, but have not been updated to reflectincreases in construction costs since publication of the IDP in February 2014. Neither the LPA nor the Local Highway Authority has requested that the appellant assesses the impact of development at the Perryfields site on the Waitrose junction following implementation of the IDP junction signalisation scheme or any other scheme thatmay be promoted by the County Council.	Consequently, there is no evidence available for the local community or the Decision Maker to judge if the Local Highway Authorities IDP signalisation scheme, or any other County Council promoted scheme, atthe Waitrose junction will mitigate the impact of development at the Perryfields site in terms of capacity, congestion and highway safety.

Based upon the above, it is the considered opinion of WVV that insufficient information has beenprovided to convince ourselves, the local community, and the Decision Makers that the impact ofdevelopment at the Perryfields Town Expansion Site on highway safety, ease of movement and congestion can be cost effectively mitigated, a test specified in the National Planning Policy Framework (NPPF).

Consequently, WVV respectfully request that the Planning Committee resolve that outline planning

Cllr Luke Mallet – Local Ward Member for Hill Top Ward
e-mail 12.03.2021 10:18 enclosing

- WVV Briefing Note – Perryfields Through Traffic
- WVV Briefing Note – Impact of Future Developments on Travel Times within Bromsgrove

Bromsgrove Society OBJECTION 11.03.2021

HIGHWAYS ISSUES

Perryfields Spine Road

The Society notes the proposal that Perryfields Road will be severed and replaced with a new spine road linking Kidderminster Road and Stourbridge Road and that this road will be designed to deter through traffic from travelling through the proposed Perryfields site. The Society also notes that Paragraph 8.124 of the District Plan states "in order to reduce congestion and improve air quality in the Town Centre, wherever possible, through traffic will be routed via alternative less congested routes".

Furthermore, Paragraph 8.162 of the District Plan states "road congestion is an increasing problem for the Town Centre, particularly during peak hours and when traffic attempting to avoid motorway congestion diverts to the local road network". Clearly the proposal to deter the through routing of traffic across the Perryfields site will have an impact on the road network external to the Perryfields site over and above that arising from the traffic generated by the development itself. The Transport Assessment fails to inform the local community of the additional impact arising from the proposal to deter through traffic from crossing the Perryfields site. However, local knowledge indicates that the additional impact will be greatest in the Sidemoor Area, All Saints Road & Victoria Road and in the Town Centre.

Paragraph 4.64 of the Transport Assessment states that the design of the spine road has been agreed with the County Council. If this is correct, it appears to The Society that no evidence is provided to justify the County Council's decision to ignore the strategy in the District Plan to route through traffic along less congested routes than those in the Town Centre. Furthermore, regarding the routing of through traffic between Kidderminster Road and Stourbridge Road, The Society welcomes that;

1. The Local Transport Plan identifies that a longer term transport strategy is currently being developed f r the Bromsgrove District and that the case for a potential Western Bypass for Bromsgrove is one of the options that will be comprehensively assessed.
2. The outcomes of the strategic transport assessment that has been commissioned by the County and District Councils will feed into future versions of the Local Transport Plan and the Bromsgrove District Plan. The Western Distributor Road feasibility study undertaken by the County Council in 2015 identified two route options linking Kidderminster Road and Stourbridge Road both of which cross the proposed Perryfields development site. These route options would no longer be viable if the Perryfields application with the submitted illustrative master plan was to be granted consent.

However, it appears to The Society that this matter could be addressed if the Applicant came forward with an acceptable proposal for a spine road designed to have the characteristics and functionality of a distributor road.

Assessing the Impact of Development at Perryfields

Following the decisions by Bromsgrove District Council and Redditch Borough Council to approve development at the Foxlydiate cross-boundary site (application 16/0263) and the granting on appeal of development at the Whitford Road site (application 16/1132) these two sites must now be considered as committed developments for the purpose of assessing the impact of development at Perryfields on the road network.

Consequently, it is necessary to assess the impact of development at the Perryfields site using Scenario 7 as described in Table 7.1 and Paragraph 7.9 of the Transport Assessment. For the avoidance of doubt assessment Scenario 5 is no longer applicable as it does not include the traffic generated by development at the committed Whitford Road and Foxlydiate sites.

Rat running

With regards to the potential of development at Perryfields generating undesirable rat running on residential streets, four iterations of the applicant's transport assessment have been submitted. The first two iterations dated December 2015 and August 2016 released into the public domain diagrams showing the assignment of development vehicle trips to the local highway network. The Society is very concerned that for the final version of their transport assessment the applicant has chosen not to release equivalent development traffic flow diagrams into the public domain.

The consequence of the applicant's failure on this matter is twofold. Firstly, residents are unable to determine if development at Perryfields will increase traffic in their street thereby prevented from making meaningful representations through the planning application consultation process.

Secondly, Decision Makers are impeded when judging if development will have an unacceptable impact on highway safety in residential streets.

The Society has examined the roads included in the applicant's traffic model and considers that the locations were residents have not been provided with appropriate information to consider the impact of development on highway safety are;

1. In the Hill Top Ward; Dovecote Road, Millfield Road and Shrubbery Road.
2. In the Lowes Hill Ward; All Saints Road and Victoria Road;
3. In the Sanders Park Ward; Broad Street, Churchfields, Church Lane, Church Road, Crabtree Lane, Providence Road and Willow Road;
4. In the Sidemoor Ward; Broad Street, King Edward Road, Middleton Road, Orchard Road, Santridge Lane, Providence Road and Recreation Road.

Impact of Development on Journey Times

The Society notes with concern that the Mott MacDonald Technical Note on Paramics Modelling Issues dated 5th March 2020 states; "MM note that in the PM peak periods in particular, despite a reduction in overall network journey times, there are large increases in delay at some junctions which are obviously offset by improvements elsewhere in the network, the majority of which are not development led mitigation and in fact relate to the A38 major scheme which is being promoted by WCC and provide benefit to strategic traffic passing along this particular corridor as opposed to providing relief to local traffic conditions in Bromsgrove"

The Society notes that Tables 7.2 to 7.7 of the Transport Assessment show journey times and delays across six routes to demonstrate the impact of development at the Perryfields site for assessment Scenario 4 which does not make use of the development vehicle trip generation agreed with the District Council and County Council as being appropriate nor does it include Whitford Road and Foxlydiate as committed developments.

The Society are very concerned that the equivalent journey time analysis has not been provided in the same tabulated format for Scenario 7 as this is the basis upon which a decision on the planning application must be made. Consequently, The Society is prevented by the omission of this information from making meaningful representations through the planning application consultation process on the impact of development on journey times. Similarly, Decision Makers are impeded when judging if development at Perryfields will have an unacceptable impact on journey times.

Impact of Development at Individual Junctions

Tables 7.9 to 7.29 of the Transport Assessment show the impact of development at the Perryfields site on all arms at a number of junctions across the road network for assessment Scenario 4. As noted above Scenario 4 does not make use of the development vehicle trip generation agreed with the District Council and County Council as being appropriate nor does it include Whitford Road and Foxlydiate as committed developments.

The Society are very concerned that the equivalent individual junction assessments have not been provided in the same tabulated format for Scenario 7 as this is the basis upon which a decision on the planning application must be made. Consequently, The Society is prevented by the omission of this information from making meaningful representations through the planning application consultation process on the impact of development at individual junctions. Similarly, Decision Makers are impeded when judging if development at Perryfields will have an unacceptable impact on congestion and delays at junctions across the road network.

Bromsgrove Town Centre and the National Planning Policy Framework

As acknowledged in paragraph 8.162 of the District Plan, the Town Centre currently experiences congestion and delays. It appears to The Society that this arises from conflict between local traffic, vehicles routing east – west on the A448 which links the principal towns of North Worcestershire and vehicles routing north – south on the B4091. The Society agree with the comments made in the Worcestershire County Council consultation response on highways matters dated 4th November 2020 that “road congestion is an increasing problem for Bromsgrove Town Centre, particularly during peak hours”.

However, The Society, for the reasons given below, does not agree with the County Council’s conclusion that “the highway enhancements proposed by the Applicant manage the residual traffic impacts as far as is reasonably practical with due consideration to the built environment of a historic Market Town in accordance with NPPF”.
There is no such “manage the residual traffic impacts as far as is reasonably practical” test within the National Planning Policy Framework (NPPF).

The relevant test is NPPF Paragraph 108(c) which requires that when "assessing specific applications for development, it should be ensured that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree".

Clearly, the NPPF requirement to mitigate significant impacts to an acceptable degree is a more stringent test than the "manage the residual traffic impacts as far as is reasonably practical" test that has been applied by the County Council.

Taking each of the A448 Town Centre junctions in turn.

<u>Impact of Development at the Parkside Junction</u>
With regards to The A448 Market Street / B4091 Stourbridge Road / Birmingham Road / A448 The Strand (Parkside) Junction, The Society notes that;

1. The applicant demonstrates in their transport assessment that the junction will operates over capacity in 2030 without development at the proposed Perryfields site.

2. The applicant proposes a mitigation scheme that bans right turns from A448 Market Street into A448 The Strand and bans left turns from Birmingham Road into The Strand. The applicant claims that this scheme will deter drivers from approaching the junction from the east and the west and encourage drivers to travel on the underutilised A38 and B4184.

3. The Society notes that the applicant's mitigation proposals are not part of the Local Transport Plan, the applicant fails to present any evidence that the A38 and New Road are underutilised and banning traffic movements into The Strand from Market Street and Birmingham Road will not deter drivers approaching the junction from the east from using the junction.

4. The applicant demonstrates in their transport assessment that with the implementation of their mitigation proposals the performance of the junction will deteriorate further in Scenario 4 with the addition of Perryfields development vehicle trips.

5. The applicant fails to provide within the Transport Assessment a table showing the performance of the junction for the required Scenario 7. On this basis it appears to The Society that the impact of development at Perryfields will have a severe impact on ease of movement, congestion and highway safety at the Parkside junction and this provides sufficient reason to refuse the planning application. The Society understands that the County Council is developing an alternative improvement scheme for the Parkside junction and that funding has been secured for the scheme. However, no such scheme has been submitted for consideration and consequently Decision Makers have no evidence before them to demonstrate that the County Council scheme will mitigate the impact of development at the Parkside junction. Consequently, it appears to The Society that it has not been demonstrated that the impact of development at the Parkside junction will not be severe.

Impact of Development at the BirdBox Junction With regards to the A448 St John Street / A448 Market Street / B4184 St John Street (BirdBox) Junction, The Society notes that the Table 7.37 of the Transport Assessment shows for Scenario 5 it being severely congested with ratios of flow to capacity of 1.37 and 1.55 in the AM and PM Peak hours respectively. Clearly, the performance of the junction can be expected to deteriorate further with the addition of traffic from the Whitford Road site. However, the applicant does not propose a solution to mitigate the very severe impact of development as shown by their Scenario 5 junction assessment.

The County Council have requested a Section 106 contribution towards an unspecified junction improvement scheme at the BirdBox with the cost of the scheme being identical to the traffic signalisation scheme shown in the Infrastructure Delivery Plan (IDP).
The Society are very concerned that the County Council have not required the applicant to demonstrate that the signalisation scheme in the IDP, or any other scheme for that matter, will mitigate the impact of development.

The Society questions why the County Council is expecting Decision Makers to accept that the NPPF Paragraph 108(c) requirement of ensuring that any significant impacts from development in terms of capacity and congestion at the A448 BirdBox junction can be cost effectively mitigated to an acceptable degree through the delivery of an IDP scheme without any shread of evidence that will be the case.

Furthermore, The Society are very concerned that the County Council's requested Section 106 contribution for delivery of the IDP scheme has not changed since 2014 when construction costs have increased in the intervening period. Consequently, there can be no certainty for the Decision Maker that the IDP signalisation scheme can be delivered without additional funding from other sources.

<u>Impact of Development at the Waitrose Junction</u>
The County Council identifies in their consultation response dated November 2020 that the applicant's submitted designs to improve the junction could, not will, address any residual impacts of development at the Perryfields site. However, The Society notes that there is no junction impact assessment covering all junction arms for Scenario 7 in the main body of the appellant's transport assessment to support the County Council's conclusion. Bromsgrove Society Comment.

The County Council have requested a Section 106 contribution for the purpose of delivering a WCC junction improvement scheme. The improvement scheme identified in the IDP is to signalise the junction.

The Society are very concerned that the County Council have not required the applicant to demonstrate that the signalisation scheme in the IDP, will mitigate the impact of development. Again, The Society questions why the County Council is expecting Decision Makers to accept that the NPPF Paragraph 108(c) requirement of ensuring that any significant impacts from development in terms of capacity and congestion at the Waitrose junction can be cost effectively mitigated to an acceptable degree through the delivery of an IDP scheme without any evidence that will be the case.
Again, The Society are very concerned that the County Council's requested Section 106 contribution for delivery of the Waitrose junction IDP scheme has not changed since 2014 when construction costs have increased. Consequently, there can be no certainty for the Decision Maker that the IDP signalisation scheme can be delivered without additional funding from other sources.

Turning now to the impact of development at junctions away from the Town Centre. Impact of Development at the Rock Hill / Fox Lane Junction The Society are concerned by the totality of the departures from standard required to deliver the proposed junction improvement scheme in this constrained location which has challenging gradients and the overall safety of the junction. Furthermore, The Society are very concerned that there is no all arm junction assessment provided for Scenario 7 in the main text of the transport assessment as this is the evidence required for determining that the impact of development at the Perryfields site can be cost effectively mitigate. Consequently, The Society is prevented by the omission of this information from making meaningful representations through the planning application consultation process on the impact of development at the Rock Hill / Fox Lane junction. It appears to The Society that the loss of parking spaces in the Rock Hill layby is likely to have an impact on passing trade at the Rock Hill convenience store with the consequence that this valued local amenity may be lost. Also the absence of a parking space at the front of the store capable of accommodating deliveries currently made using lorries of 18 tonne gross vehicle weight is likely to have an adverse impact on road safety as delivery drivers will be forced to park elsewhere on the highway in close proximity to the shop.

Impact of Development at the Catshill War Memorial Junction

With regards to the B4091 Stourbridge Road / B4185 Meadow Road / Westfields (Catshill War Memorial) Junction the applicant's modelling of the junction for Scenario 4 shows that during the AM and PM Peak Hours the Stourbridge Road northbound approach to the junction will operate above the threshold at which mitigation is required to offset the impact of the proposed Perryfields development. No junction assessment is provided in the main text of the Transport Assessment for Scenario 7 which adds to the flows the third of traffic generated by development at Whitford Road that are expected to route through the junction. On this basis at appears to The Society that the impact of development at Perryfields on the capacity of the junction will be unacceptable.

Conclusions by Bromsgrove Society on Highways Issues

On the basis of the points raised above, insufficient information has been provided to convince The Bromsgrove Society that the significant impacts of development at the Perryfields site on highway safety, ease of movement and congestion can be cost effectively mitigated to an acceptable degree. The National Planning Policy Framework does not support schemes that would have an unacceptable impact on highway safety or severe transport impacts. Consequently, The Bromsgrove Society considers that both applications 16/0335 and 20/00300/FUL should be REFUSED.

Further Comments from Members of the Public

The development would –

- Result in further traffic
- Result in the loss of valuable Green Space
- Place strain and further demand on existing overstretched services schools, doctors, sports and leisure facilities, shops, supermarkets.
- Not mitigate its impacts through offsite highway improvements
- Rely on existing inadequate highway infrastructure and does not provide a western relief road
- If approved, the proposals to move and upgrade the Stourbridge and Kidderminster Road and Rock Hill Junctions and the road through the site. Must

be put in place before major work commences on house building, so that there is a safe way for construction traffic and the current local traffic to safely navigate their way through what is already a congested road network.

- A Western relief road would be the answer. All studies over many decades have shown that building such new roads or widening existing roads do not have the desired effect of reducing traffic congestion, just the opposite in fact. This may be counter-intuitive, but actually such schemes generate new traffic and encourage car usage when we should be trying to do the opposite. And of course there is the small matter of expense of road developments, the environmental damage, increased greenhouse gas emissions and extra pollution from vehicles that is dangerous to human health.

- I would not oppose a proportionate growth in new housing so long as it was built to exacting environmental standards, had good infrastructure like footpaths/cycleway links to the town and a regular subsidized bus connection. I would also want to see an element of social housing and a developer contract that ensured that all the other promised social infrastructure was actually delivered.

Officer Comments

Para 24.17, the £1.337m NHS contribution is incorrect. This was reduced by a revised request received in January 2021. The correct figure from the NHS Trust is set out in their comment on page 64 and is stated correctly in the report in Recommendations (xv), as a maximum of £807,315.63.

Para 24.18, the population numbers reported in this paragraph are different from the NHS update of January 2021. The development population in Appendix 4 (Calculation of Contribution request) is 3,523 not 5,965.

20/00300/FUL – The former Greyhound PH, 30 Rock Hill

Further Representations

Bromsgrove Society OBJECTION 11.03.2021

HERITAGE ISSUES relating to 20/00300/FUL

The Society notes the comprehensive summary of the development and usage of the building provided by Bromsgrove District Council's Conservation Officer Mary Worsfold in her consultation response to application 16/1132/FUL and 20/00300/FUL. The Society believes the building to date from the century before the known documented evidence. Aris's Birmingham Gazette confirms that it was known as The Greyhound by 16th September 1839.

The tithe map of 1840 shows William Guest listed as the occupier of the building in plot 2685, which we know to be The Greyhound.

The listing of William Guest in the 1850 Slaters Directory as a beer retailer and The Greyhound as a pub in the trade directories from the 1860's onwards along with the large number of quarries clustered around The Greyhound in 1885 with a limited number of homes nearby as shown on the First Edition OS map are very strong indicators that The Greyhound was meeting demand for beer from quarry workers. As such The Society considers that The Greyhound Inn forms an important and tangible link back to the industrial heritage of the Rock Hill area of Bromsgrove.

Local Heritage List

Regarding Bromsgrove District Council's Local Heritage List the Conservation Officer states:

"In terms of the Local Heritage List the building would clearly be a candidate and would satisfy the selection Criteria as follows;
Criteria 1 - Age, Authenticity and Rarity
Dates from at least the early part of the 19th century, and the original form of the building, and its subsequent development is clearly discernible. It is an example of a vernacular dwelling which has evolved through the 19th century into a public house.
Criteria 3 - Historic Interest
As asset which dates from a time when Rock Hill was not an extension of Bromsgrove, but a sparsely populated area of wayside development. Mention has been made that it was a quarrymen's pub, and there was extensive quarrying in the area, so if that was the case it is the only link to the industrial past of the area.
Criteria 4 - Townscape/ villagescape / landscape interest
A landmark building which due to its age and raised position, on the corner of Rock Hill and Fox Lane, makes a positive contribution to the surrounding area. It is a notable feature in the historical development of the area. It dates back to a time when this area was separate to Bromsgrove."

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 notes that the minutes of the Planning Committee of 6th November 2017 record for refused application 2017/00950/FUL that The Greyhound Inn be demolished; *"Whilst the building was not currently listed as a local heritage asset, Members considered that there was the potential for the building to become one and be of benefit to the people of Bromsgrove.*

With regards to planning application 20/00300/FUL the Council's Conservation Officer concluded;
"The loss of this heritage asset is not supported, and it would [be] preferable to see the current scheme amended to retain this building…"

The Bromsgrove Society supports the retention of the Greyhound Inn building.

If the application were to be approved;
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.

Bromsgrove Sandstone
During 2018 the clearance of vegetation adjacent to the car park in Fox Lane revealed that the highway here cuts through Bromsgrove Sandstone. Regrettably the landowner has allowed the vegetation to become overgrown again and the sandstone exposure is now largely obscured.

Through the work spanning eight decades of the 20th Century of Professor L J Wills of the University of Birmingham the Rock Hill Area has played an important role in geological research with a number of fossils named after the Town. The Society notes with concern that the concept drawing for the proposed roundabout at the Rock Hill / Fox Lane junction appears to require the removal of part of the existing sandstone exposure but the Herefordshire and Worcestershire Earth Heritage Trust have not been consulted specifically on this matter.

Conclusion of Representation by Bromsgrove Society
Based on the points raised regarding the historical significance of the Greyhound Inn and its associated local sandstone the Bromsgrove Society considers that Planning Application 20/00300/FUL: should be refused and that Planning Application 16/0335 should be refused.

Officer Comments

The development proposed under 20/00300/FUL mirrors that which was approved on appeal in respect of the application 16/1132 which incorporated the same roundabout junction solution. The principle of a roundabout in the same form as that proposed has therefore been established by that appeal decision.

All the material issues raised in respect of the development were considered and weighed by the Appeal Inspector considering the Whitford Road (incorporating the Greyhound site). It is considered that no new issues have been identified in highway or heritage terms which would warrant a different conclusion being reached to that made by the Appeal Inspector.

WCC have completed the safety audit and 278 process for the roundabout. Notwithstanding the extant permission (allowed at appeal) for Whitford Road, the ability to implement the roundabout solution is bound by the terms of that permission, which is the reason permission is sought separately for the works under application 20/00300. In the event the appeal in respect of 16/0335 and 20/00300/FUL are allowed, the sequence off site junction works required to mitigate the impact of 16/0335 including 20/00300 can be controlled by condition and s106 agreement.

The roundabout would improve highway safety at this junction, significantly reduce queue lengths and waiting times, and accordingly has scope to improve air quality compared with the present situation. The Air Quality statement states: *"With reference to the pollutant of greatest concern, NO2, the predicted annual-mean NO2 concentration decreased with the development. …3.2 Further analysis has been undertaken for Rock Hill and Fox Lane. The emission factors in Defra's toolkit all decrease with the Perryfields Development indicating the air quality impacts are, if anything, beneficial at this junction."*

The capacity of the proposed junction has been assessed and agreed by WCC and BDC's Transport consultants as acceptable to serve both the Whitford Road and

Perryfields developments, now endorsed by the Appeal Inspector in respect of the Whitford Road decision.

For the avoidance of doubt, the Albert Road access is solely to serve maintenance of the remnant land and no development beyond the roundabout is proposed as part of this application (20/00300/FUL), hence visibility requirements are less than in the Catesby scheme (16/1132) where it was intended to serve housing development on the former pub site.

Revised Condition 2 (the condition in the agenda omitted reference to two plans)

1. The proposed junction alterations to the junction of Fox Lane and Rock Hill to form a roundabout shall be provided in accordance with drawings
   7033-SK-005-F.
   2960 FR01 ('Location Plan')
   7033-SK-012 Rev A ('Greyhound Inn Site Proposed Access')

   REASON: To ensure conformity with submitted details.