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Date: 07 February 2022
Your ref: 21/01830/FUL
Ask for: Nigel Gorski

Dear Paul Lester,

**TOWN AND COUNTRY PLANNING ACT 1990
(DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015
ARTICLE 18 CONSULTATION WITH HIGHWAY AUTHORITY**

PROPOSAL: Residential development (Class C3) with a vehicular access point onto Hither Green Lane, play areas, public open space including footways and cycleways, sustainable urban drainage systems and all other ancillary and enabling infrastructure

LOCATION: Land West of Hither Green Lane, Redditch, Worcestershire

APPLICANT: Mr. A. Rowan

Worcestershire County Council acting in its role as the Highway Authority has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals. The Transport Planning and Development Management Team Leader on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 recommends that this application be **deferred**.

The Highway Authority has undertaken a review of the Transport Assessment (TA) dated October 2021, as prepared on behalf of the applicant by Mode Transport Planning. Our comments are set out below.

Planning context

It is understood that this application site does not form a strategic allocation within the adopted Redditch Local Plan (2011-2030). The principle of development in this location is therefore not established and remains untested.

Development proposals

The development proposals include for a residential site of 216 units comprising mix of private, social and affordable housing. The planning application form identifies the proposals to include no.81 x 3 bedroom private dwellings, no. 70 x 4 plus bedroom private dwellings, no. 26 x 2 bedroom social dwellings, no. 4 x 2 bedroom social flats, and no. 3 x 3 bedroom social dwellings. The site will also include no. 6 x 2 bedroom affordable dwellings and no. 17 x 3 bedroom affordable dwellings.

The proposals will replace the north-western parcel of the existing golf course located to the west of Hither Green Lane and include a new T junction access from Hither Green Lane.

Access

A single point of vehicular access is provided to the site as a new priority crossroads junction with Hither Green Lane. This junction also includes an unnamed access road serving the golf range on the opposite side of the carriageway. The TA intends the access to incorporate a 5.5m width carriageway, with 10m corner radii and 2m wide footways on either side.

For access visibility, this needs to be determined using 85th percentile speed data and not be based on the speed limit of the carriageway. Visibility should be measures from a distance of 2.4m (x) distance along the edge of the carriageway and include any tangents to the kerb line.

The swept paths provided for the access junction (with Hither Green Lane) show a refuse vehicle traversing over the centre site to turn in and out of the site. The access junction should be designed to accommodate these movements. The access design should be revisited.

Para. 4.3.1 of the TA states that *'on account of the scale of development proposed, an alternative point of access into the site will be provided for emergency vehicles'*. This to be provided on to Dagnell End Road at the western end of the site, with a 3.7m wide pedestrian link, with retractable bollards to prevent private vehicle access.

This access is however not shown on the 'proposed site layout' drawing prepared by Urban Design Ref: ME-24-21S. If proposed, the emergency access needs to be included on this drawing, with details shown of how it fits into the remainder of the site.

The TA states that a tracking assessment has been undertaken to show that a Fire Tender (8.6m) can access and egress the site via the emergency access point.

It is accepted that a fire tender could access via this route, but the access needs to be shown to a suitable level of design, complete with visibility information and details of how it could connect to the footway. Details of how the bollards could be lowered in an emergency also needs to be presented in the TA.

A TRO will also likely be required to facilitate the proposed emergency access.

Internal site design

Comments on the internal site design include:

- The site access onto Hither Green Lane proposes a visibility splay of 2.4 x 43m. This should be checked to ensure the splay is not compromised by the proposed entrance feature walls. In the southerly direction the splay should also be provided to the tangent of the nearside kerb on the curve in Hither Green Lane.
- The shared private drives indicated close to the site access create potential conflict points due to their proximity to the main access.
- All bends should have a minimum radius of 20m in accordance with the WCC Streetscape Design Guide. Suitable forward visibility should also be provided on all curves based on 20mph design speed (25m). A design speed of 15mph and 17 metre forward visibility may be acceptable on the shorter cul-de-sacs. If this extends beyond the adoptable footway or verge, then the back of footway/verge should be moved to define the visibility envelope. There are some locations where this will affect proposed plots.
- Two bends are indicated with 90-degree outer kerb lines. These serve no functional purpose and create a potential liability for the Highway Authority and the channels cannot be fully cleaned by mechanical road sweepers. These are not acceptable for adoption and should be converted to suitable radii.
- Build-outs / narrowing's appear to be proposed at three locations within the road network. These serve no functional purpose to maintain suitable vehicle speeds and are not considered necessary to aid pedestrians crossing the road. They are however a potential future maintenance and operational liability to the Highway Authority and should be removed from the design.
- All turning heads must comply with the minimum dimensions specified in WCC's Streetscape Design Guide. Some of the turning facilities are currently not compliant. However, the turning head adjacent to plots 107 to 113 exceeds the Council's requirements for adoption and should be reduced to 26m.
- A 2m wide footway should be provided at all locations where properties have direct pedestrian access to the roads. Some cul-de-sac roads appear to have

a hybrid design, which is neither traditional or shared space with 2m footways on one side and 1m service strips on the other side. There is no logic to the arrangement and only likely to raise questions/complaints from residents. 2m footways should be provided on both sides in suitable locations, or a level shared space provided in those cul-de-sac type areas.

- The road serving plots 180 – 189 and 171 – 179 appears to be a hybrid design between traditional road and shared surface. As a through route, it is unlikely to be suitable for shared use, and should have footways both sides as properties have direct frontage access. The road alignment is also unacceptable with the offset chicane effect. This serves no functional purpose and is likely to become a pinch point for refuse and delivery vehicles should parking take place nearby. The road should be realigned with a suitable constant width.
- One-metre-wide grass service strips are not considered viable as the grass rarely becomes established due to the kerb foundations/construction either side. These would need to be hard surfaced if offered for adoption.
- There appear to be short surface change features at a few locations, which again serve no functional purpose and should be removed.
- The internal swept path analysis should be based on the 11.7 metre refuse truck indicated within the supplied TA. No swept paths should overhang adoptable footways or service strips. Localised widening should also be provided on bends to allow a refuse truck and car to pass each other within the carriageway.
- The applicant should be aware of the maximum adoptable carriageway and footway gradients as detailed within WCC Highway Design Guide. Any block paved roads must have a minimum longitudinal gradient of 1 in 80 to reduce the risk of standing surface water. If this is not achievable then a tarmac surface will be required.
- Any private parking spaces abutting the back of adoptable footway or service strip should be a minimum of 6 metres deep.
- Tactile paving should be provided at junction crossing points. These should be placed on the pedestrian desire lines.
- Details of suitable surface water drainage arrangements for capture and discharge of water from the roads and footways would need to be provided before adoption of the roads was considered.

Street lighting

The street lighting team at WCC inform that a suitably qualified lighting engineer should be appointed to carry out an assessment for the proposed development in line with WCC's Street Lighting Design Guide (SLDG). Given the anticipated increase in usage

the assessment should also include the existing junction between Dagnell End Road and Hither Green Lane.

Should lighting be required consideration shall be given, in consultation with WCC, regarding the need for any proposed lighting to tie in with the existing decorative style currently used on Hither Green Lane.

It should also be noted that replacement lighting from Dagnell End Road to a suitable point beyond the proposed development access may be required in line with the guidance given in the SLDG with specific regard to WCC's ongoing energy, ecological and maintenance commitments. Please note it is a requirement to provide an environmental impact assessment of any lighting proposals and this shall be carried out by a qualified ecologist.

Any private lighting within the development shall need to be designed sympathetically to the surrounding environment and should include liaison with WCC's ecologist and the parish council to ensure the proposals are acceptable.

Trip generation

Mode have presented vehicle trip rates derived from TRICS and compared these to site surveys used in the Brockhill Phase 3 application. The TRICS results presented are not accepted by the Highway Authority for this site, as they reflect 'edge of town' sites with much greater sustainable transport connections. As the Hither Green Lane is more limited in its access to a good public transport network, rail, cycle and amenities in a close walking distance, the trip rates should reflect this. Especially as the proposals include some quite sizable dwellings. The trip rates presented for the Brockhill Phase 3 proposals are believed suitable for the site proposals.

The Highway Authority accepts the two-way vehicle trip rates of 0.706 (AM) and 0.750 (PM), generating 152 two-way trips (AM) and 162 two-way trips (PM).

Trip distribution / assignment

Para. 5.4.2 of the TA uses trip distribution information presented for the Brockhill Phase 3 proposals and '*the local road network has been analysed and traffic has been distributed to the zones*'. The Highway Authority requires greater clarity on how trip distribution / assignment has been calculated, as it is not clear from the information presented in the TA. This would utilise 'journey to work' census data and trips to other key destinations i.e. education, retail, etc.

Traffic figures in Appendix F are required to show the assignment of proposed development traffic separate from background and committed development trips. Traffic figures should show each traffic group separately included, so it is clear how the total traffic flows have been established. This information is requested.

Traffic Impact

Committed development traffic

In terms of committed development traffic, this should include the Brockhill Phase 3 proposals, including any dwellings of the previous Brockhill phases still to be fully constructed. Consideration should also be given to the Foxlydiate site, given its proximity and size. The LPA should be consulted on what development should be included.

Capacity assessments - Dagnell End Road Signal Junction

Despite utilising information from the Brockhill Phase 3 application, the capacity results for the Dagnell End Road Signal Junction do not match those previously approved by the Highway Authority for the same modelling scenarios, built from a fully validated and calibrated junction model. From a review of the LinSig modelling results, it is apparent that the model itself and results are different.

The Mode LinSig model shows the nearside lane on the Birmingham Road (S) approach to be a short lane, whereas in the previously approved model, this is shown to be a 'long lane'. As the LinSig mode has not been provided, it is anticipated that further differences will also be apparent. The previously approved model should be used to assess capacity at this junction, otherwise a new model should be created, which would first require revalidation and calibration.

Adding vehicle trips to an already congested junction, increasing vehicles queues and delays in this location is not acceptable. This is a key junction provided along an arterial connecting Redditch to the M42 to the north and Birmingham beyond.

Other capacity assessments

For the Highway Authority to accept the junction capacity assessments presented, an AutoCAD drawing showing junction geometry measurements or a scaled drawing should be presented. Some form of base model validation should also be provided and be agreed, before forecast development scenarios are presented.

The Highway Authority does not accept percentage impact results or a 30 trip threshold for the purposes of identifying junctions requiring capacity assessment, and these will be determined by the volumes of development trips anticipated to travel through each junction, trips adding to sensitive movements, and the operation and safety of the junction. Junctions requiring capacity assessments will be fully determined when trip distribution / assignment information is agreed and evidence of model validation / calibration has been provided.

Sustainable transport links

Pedestrian access

The Highway Authority currently identifies the site to have limited accessibility by none car modes of transport. There are currently no pedestrian footway connections from this site to local amenities, including education, health, retail, etc. The Brockhill Phase 3 proposals (committed development) are to provide some pedestrian enhancements to the Dagnell End Road signal junction, with a short extension of the footway on the south side of the Dagnell End Road carriageway. These are however shown not to reach the proposed Hither Green Lane site.

Para. 4.4.2 of the TA states that 'a new section of footway will also be provided on the southern side of Dagnell End Road, within the existing highway boundary. This will connect with the existing footway on the southern side of Dagnell End Road, providing a connection west towards the existing footway network along Birmingham Road (A441). This will be subject to confirmation of land ownership and discussions with WCC in order to agree an appropriate mechanism to tie this into the footway improvements associated with Brockhill East Phase 3'

This connection is welcomed and further details regarding its form are requested. This should be shown on a drawing and take account of the committed improvements identified for the Dagnell End Road signal junction.

Pedestrian connections to the southwest are more important for this site, with this route providing connections to bus stops, the Abbey Stadium and a route to and from the town centre. Routes across fields are unattractive and will not be used at times in the winter when its wet and dark outside. Detailed information should be presented as to how the site will provide attractive pedestrian connections to / from the town centre, along pedestrian desire lines. Details regarding the footway surface, if lit, and crossing points are requested. Further information is requested.

Public transport access

Current Service

The nearest marked bus stops to the proposed development are on the A441 north of the Dagnell End Road junction, in excess of 700 metres away from the centre of the development. Parts of the development will be more than 800 metres away. The walking route to these bus stops does not include a footpath, although it is acknowledged that a part route is being provided as part of the Brockhill Phase 3 proposals.

The stop on the A441 is serviced by Diamond bus services 182 and 183. Only two bus services for each stop in this location, all during the day and not at a time suitable for typical 9-5 employment commuting.

In addition, two school services (S55 and S83) operate in the morning and afternoon to access Bromsgrove Schools. These services are unlikely to be suitable for adults due to the destination and the numbers of children using the service and there is unlikely to be space to take additional children.

Although Hither Green Lane is on the edge of Redditch, secondary schools for the catchment area are: North Bromsgrove High School (approx. 17km), South Bromsgrove High School (approx. 13.5 km), Alvechurch Middle School (approx. 4.9km). These distances necessitate the use of a vehicle as they are not within reach, nor are accessible via a safe route for active travel. The primary school within the catchment is Beoley First School which is approximately 2.5 km from Hither Green Lane. This is a long distance for primary age school children to walk plus there are no footways (at present) along much of Dagnall End Road leading to the school.

Future Service Requirements

In order to make this development acceptable in planning terms meeting the requirements of the 1985 Transport Act, WCC's LTP4 and the NPPF para 124 (c) a new bus or enhanced service will be required.

Due to the current uncertainties around commercial bus services and the complexities of conformance with public sector procurement regulations, Worcestershire County Council policy is to request contributions towards bus services associated with major developments on the basis of a stand-alone service. The envisaged service will provide an hourly frequency service running from Redditch bus station to the development covering working hours to allow access to Redditch for working and the train station for further afield employment opportunities. Without such a service this development would not be acceptable as it would be predominantly car dependent.

School / Community Transport

The statutory duty to provide free home to school transport is detailed in guidelines issued annually by DfE as required under the Education Act 1995. Worcestershire County Council puts these guidelines into effect through its Transport and Travel Policy again revised annually. This is a statutory provision related to the duty to provide school places and is required for the development to proceed as the development will cause the County Council to incur costs as a direct result of the distance between the proposed development and one or more designated schools.

Normally children living in Worcestershire are expected to attend the appropriate designated school for the children's age and address. Where places are not available in the designated school, the children may be assigned to another school or re-designated school. It is anticipated that school to travel and or community contributions may also be required for public transport. These will be identified as the planning application progresses.

Parking

Car and cycle parking is believed to be provided in accordance to standards set out in the WCC Streetscape Design Guide. Although it is noted in Para. 4.6.2 of the TA that the *'application is being submitted in outline form with all matters reserved apart from access, therefore the final quantum of parking will be determined at the Reserved Matters stage'*. A full application has been submitted for the proposals, so any amendments to car parking provision set out in the TA need to be identified and presented now.

Travel planning

The Highway Authority has undertaken a review of the Residential Travel Plan (RTP) and identified that the scope of external site measures put forward to encourage and promote sustainable journeys include:

- To the north of the site, a pedestrian route will link the site with Dagnell End Road and connect to a new section of footway that will be provided on the southern side of Dagnell End Road, connecting to the committed Brockhill Phase 3 proposals in this location,
- To the south and west pedestrian / cycle connections will be provided with the existing footway which runs alongside the River Arrow and connects with Birmingham Road immediately north of the river over-bridge.
- A Travel Information Pack will be produced and disseminated to residents, detailing the opportunities for sustainable travel to and from the site, including

a potential range of incentives and the promotion of regional and national car share websites

- Use of public transport will be with up-to-date public transport timetables, bus maps and ticket information disseminated to the residents. The possibility of offering residents with discounted bus vouchers/passes with local operators will also be investigated.
- Personalised Travel Planning (PTP) will allow residents to contact the TPC and arrange a meeting (either face-to-face or via email/telephone) to discuss their individual circumstances with the TPC who will assist in tailoring a travel plan specific to that resident, incorporating sustainable travel modes as much as possible.

The RTP seeks to achieve a mode shift reduction in single occupancy car trips of 5% (from baseline surveys) over a period of 5 years. Based on the trip generation results presented, the success of the RTP would reduce weekday peak hour car trips by 8 vehicles in the AM and PM peaks.

Based on the level of provision set out in the RTP, the Highway Authority does not believe this mode shift would be realised. The promotion of sustainable journeys is most successful when there are plentiful non-car opportunities in which to choose from. At present, the development site offers limited sustainable options in which to promote.

The Travel Welcome Pack should also be presented to the WCC travel plan officer for review and approval.

Summary

Unlike the Brockhill Phase 3 proposals, the proposals to the west of Hither Green Lane do not form an allocated site in the Redditch Local Plan. The site is more remote in terms of access to sustainable transport provision and amenities in the town centre.

The Highway Authority has undertaken a review of the Mode TA and has identified a series of points that require further consideration / information. The operation of the Dagnell End Road signal junction in particular is a primary concern, given that nearly all proposed development trips generated by this site would travel through it.

The Highway Authority therefore submits a response of deferral until the required information has been provided and considered.

Yours Sincerely

Nigel Gorski

Development Control Engineer

On behalf of Karen Hanchett, Transport Planning and Development Management
Team Leader