



Barratt David Wilson Homes (Mercia)

Land off Hither Green Lane, Redditch

Rebuttal Proof of Evidence – App 1 (Highways & Transport)

January 2025



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1. Introduction

1.1 Declaration

1.1.1 My submission of this Rebuttal Proof of Evidence (RPoE) to this Inquiry is on behalf of Barratt David Wilson Homes (Mercia) ('the Appellant') and I present evidence on transportation matters.

1.1.2 The evidence that I have prepared has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my own true and professional opinions. My credentials are set out in my main Proof of Evidence (PoE) (**Section 1.1**) and remain current.

1.1.3 I have prepared this RPoE to assist the Inspector in dealing with issues raised by the primary evidence of Mr Alan Bailes on behalf of the North Redditch Community Alliance (NoRCA).

1.2 Summary of issues

1.2.1 I have reviewed the evidence submitted and the principal highways and transportation points can be split into two key headings:

- Site accessibility and modal choice; and,
- Assessment of development traffic impact at the A441 / Dagnell End Road signalised junction.

2. Previous NoRCA Submissions

2.1 Preamble

2.1.1 The Appellant is aware of comments raised by NoRCA with respect to highways and transport matters during 2022, 2023 and early 2024 as part of the determination process of the application. This has included the preparation of several technical responses that were submitted to Redditch Borough Council (RBC) in their role as Local Planning Authority (LPA) and Worcestershire County Council (WCC) in their role as Local Highways Authority (LHA). The timing of the NoRCA work preceded the planning committee and would therefore have been taken into account by the planning and highway authorities when they concluded no objection to the application.

2.2 Overview

2.2.1 The following information and plans were submitted as part of representations made on behalf of NoRCA in relation to transport and highways:

- 9th February 2022 - *21_01830_FUL-ALAN_BAILES_OBJ-1005420* submitted by Mr Bailes on behalf of NoRCA. Main objections arose around the impact on the Dagnell End Road / A441 junction and the perceived lack of accessibility by sustainable modes.
- 28th September 2022 - *221011_325756-TN002-LinSig Review Rev C* (CD I12) submitted by mode in response to WCC's comments regarding the LinSig model used to assess the impact of the junction at the Dagnell End Road / A441 junction.
- 12th December 2022 - *221212_325756_TN003* (CD I13) submitted by mode outlining the rationale for the collection of updated traffic survey data, and the revised capacity analysis of the Dagnell End Road / A441 junction.
- 21st April 2023 - *230421_325756_TAA 001* (CD B35) submitted by mode providing further details on the updated traffic survey and revised capacity analysis of the Dagnell End Road / A441 junction and details of proposed measures to promote sustainable accessibility at the site. The TAA also discussed additional matters relating to the site access and internal layout.

- 28th June 2023 - *21_01830_FUL-ALAN_BAILES_ADDITIONAL_OBJECTION-1066021* submitted by Mr Bailes on behalf of NoRCA. Main objections were again raised around the revised background traffic data used to assess the Dagnell End Road / A441 junction and the perceived lack of accessibility by sustainable modes.
- 9th January 2024 - Proposed Infrastructure Improvements
 - *Drawing J32-5756-PS-012 Rev A* (CD I8) – Dagnell End Road Footway;
 - *Drawing J32-5756-PS-013 Rev A* (CD I9) – River Arrow Foot / Cyclepath; and,
 - *Drawing J32-5756-PS-014 Rev A* (CD I10) - A441 Birmingham Road Foot / Cycleway.

2.2.2 Whilst the concerns and points raised by the resident's groups were acknowledged and considered fully, no further responses were submitted by the applicant at this point prior to the planning committee, primarily as we did not agree with their technical position and neither did the LHA as they maintained their position of no objection; furthermore, there were not any new issues raised.

2.3 Determination

2.3.1 The planning committee minutes of 20th March 2024 (CD C4) confirm this stance in greater detail.

- A Committee Member queried the accuracy of traffic flows obtained in November 2022 for the purpose of the assessment of the A441 / Dagnell End Road signalised junction.
- WCC's Highways Officer addressed this concern by advising that:
 - Appropriate modelling had been undertaken on a number of highways junctions which could be impacted, including the Hither Green Lane / Dagnell End Road junction;
 - It was concluded that although there would be an impact, it could not be described as severe. It was added that the development did not contradict any policies and WCC's opinion was that the impact could not be determined as severe enough to warrant an objection to the application, subject to conditions and contributions/improvements to infrastructure identified in the report; and,
 - It was added that the LHA had seen the research commissioned by residents, including its differing conclusions on peak hour vehicle movements, however that the traffic survey data used by the Appellant had been validated against several months' worth of data from the LHA's own permanent traffic counter, which is positioned on the A441 to the north of the Dagnell End Road junction.

2.3.2 As detailed within the planning committee minutes, members accepted that without objections from the relevant consultee, highways should not form part of any refusal. In this regard, it is noted that whilst the application was refused at the conclusion of the planning committee, no highways reason was cited in the Reasons for Refusal. The council has now signed a Statement of Common Ground describing how planning permission should be granted.

3. Sustainable Access

3.1 Preamble

3.1.1 As part of this rebuttal, I have reviewed NorCA's Statement on Highways and Transport Aspects (January 2025); which is included as Appendix A of their PoE. Specifically, this Chapter of the rebuttal considers NoRCA's comments regarding the potential for access to and from the site via sustainable modes.

3.2 Overview

3.2.1 Mr Bailes (on behalf of NoRCA) raises concerns that the site is not situated in a location which will ensure that residents and visitors are provided with genuine modal choice.

3.2.2 In this regard it is noted that within his PoE, Mr Bailes overlooks the vast majority of the sustainable transport interventions that the Appellant is promoting that will provide genuine modal choice for all site users. For clarity, these interventions are broadly summarised below, with the following sections providing my rebuttal to the various comments raised in Mr Bailes' PoE.

- Planning Conditions
 - Off-site Infrastructure Improvements – Footway along Dagnell End Road;
 - Off-site Infrastructure Improvements – Widen existing footpath along River Arrow to 3m shared foot / cycle path;
 - Off-site Infrastructure Improvements – Widen existing footpath along A441 (south of River Arrow to Abbey Stadium) to 3m shared foot / cycleway;
 - Residential Travel Plan – commitment to monitor and promote the use of sustainable travel to and from the site;
 - Cycle parking in accordance with WCC's adopted highway design guide;
 - EV charging facility for each dwelling.
- Planning Obligations
 - Diversion of 62 / 63 service into the site, terminating at Redditch Town Centre (£439,576.80);
 - Bus service infrastructure – 2 flag pole bus stops internal to the site (£10,000);

- School transport contribution (£644,261.94); and,
- Community transport contribution (£22,037.00).

3.2.3 The various mitigation measures have been consulted on at length with WCC who have responded to the application positively; accordingly, I consider that access to the site by sustainable means can be adequately accommodated.

3.3 NMU Access

3.3.1 Within Appendix A of the PoE, Mr Bailes (on behalf of NoRCA) states the following with respect to pedestrian accessibility to and from the site:

“The level of pedestrian provision to access the proposed residential development is very limited and even with the proposed pedestrian improvements along Dagnell End Road (which will not be lit and adjacent to a high-speed road) are lacking the necessary appeal to encourage potential residents to walk and help the site to become sustainable vision in transport terms.”

3.3.2 Mr Bailes (on behalf of NoRCA) also goes on to state the following with respect to the existing footpath along the River Arrow, which provides access to the southwest, towards the A441:

“The route is a pedestrian footpath which is around 2m wide and not suitable as a cycle/pedestrian facility, where the width should be 3m wide and consequently not safe for cyclists to use. It follows, therefore, that there are no appropriate cycle routes in the vicinity of the proposed residential development to encourage cycling by using the existing facilities and is unlikely to contribute to the site becoming sustainable in transport terms.”

3.3.3 In this regard I note that in addition to the proposed infrastructure improvements to Dagnell End Road (CD I8), the proposals include for additional off-site highway works to provide enhanced connections for pedestrians and cyclists towards local amenities and public transport (CD I8, I9 and I10), which Mr Bailes has not considered during the preparation of his PoE.

3.3.4 These additional works are detailed in my main PoE (**Section 3.2**), and include the widening of the existing lit footpath along the River Arrow to provide a 3m wide foot / cyclepath to the A441. The proposed improvements also include the widening of the existing footpath along the A441 south of the River Arrow, to provide a shared 3m wide foot / cyclepath to the Abbey Stadium, where additional footpaths and an advisory cycle route can be accessed. In WCC's latest response; of no objection to the application (CD I11), they note that:

“These enhancements provide a direct route from the development towards the town centre for pedestrians and cyclists.”

3.3.5 I therefore contest Mr Bailes' comments around the sustainable accessibility of the site, and note that the Appellant has committed to provide several interventions, which have been discussed and agreed through detailed consultation with the LHA; who are responsible for the operation and management of the local highway network and have noted the following (CD I11):

“it is considered that the proposed development would deliver sustainable development in accordance with the requirements of Local Plan Policies 19, 20 and 22 and the NPPF.”

3.3.6 In this regard attention is brought to the NPPF (CD F1) which states the following:

“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”

3.3.7 This proposed infrastructure will ensure that the development is sustainable, and will provide future residents with direct and continuous links to existing amenities, existing footways, existing cycle routes and further public transport stops within Redditch, whilst also providing added benefits for existing residents of Hither Green Lane by providing a more accessible and attractive route to these amenities and facilities.

3.4 Access to Amenities and Services

3.4.1 Mr Bailes on behalf of NoRCA raises further concerns over the journey distances between the site and local amenities and services, and that these have allegedly been underestimated within the TA (CD A21) submitted as part of the application. Mr Bailes' PoE also makes references to guidance from Manual for Streets (MfS) (CD I16); that "walkable neighbourhoods" should have a range of facilities within 800m, and therefore alleges that:

"the only amenity within an acceptable walking distance is the limited Marks and Spencer food outlet at Bordesley garage. All the other amenities are at or beyond the maximum walking distances, where the potential to walk to these destinations diminishes."

3.4.2 The location of the site and the distances to local amenities and services have been discussed through the course of the determination period with WCC, who have noted that (CD I11) the site does benefit from some local amenities being located within a recommended walking distance. In order to enhance accessibility to amenities and services further, the Appellant has committed to a number of interventions to travel by sustainable modes (as outlined above and in **Section 3** of my main PoE).

3.4.3 I have considered the comments made by Mr Bailes and would suggest that consideration should also be made of the Chartered Institution of Highways and Transportation's (CIHT's) Planning for Walking (2015) (CD I14), which states that "*For journeys that are 1 to 2 miles long, 26 per cent are made on foot (NTS 2012)*". I have also reviewed the latest National Travel Survey (2023) (CD I15) statistics, which indicate that in 2023 approximately 36% of trips between 1 and 2 miles in length are made on foot.

3.4.4 In this regard, whilst it is acknowledged that exact distances to amenities will ultimately vary from plot to plot within the confines of the site, I would strongly contest Mr Bailes’s above suggestion that site users are unlikely to walk to local amenities and services. This is reinforced by guidance set out within MfS (CD I16) and the National Model Design Guide (CD F3), which state that whilst “walkable neighbourhoods” should have a range of facilities within 800m, this is not regarded as the upper limit for walking journeys and MfS notes that walking offers the greatest potential to replace short car trips, particularly those under 2km. As demonstrated in the TA (CD A21) there are a range of amenities within 2km of the site, even accounting for a measurement taken from the centre of the site.

3.4.5 I would also add that within NoRCA’s PoE, Mr Bailes overlooks the role of cycling in accessing local amenities and services, and the potential opportunities facilitated by the introduction of the interventions which the Appellant has committed to deliver as part of the proposed development.

3.4.6 The Department for Transport’s Local Transport Note (LTN 1/20) Cycle Infrastructure Design (CD I17) outlines that cycling is considered to be a highly sustainable mode of travel and generally journeys up to 8km are considered an achievable distance for most people. LTN 1/20 also states that:

“two out of every three personal trips are less than five miles in length – which is an achievable distance to cycle for most people”.

3.4.7 This is of particular relevance given the interventions outlined above, which provide a suitable connection between the site and Abbey Stadium, whereby onward access is provided to the established network of cycle routes in Redditch.

3.4.8 Overall the transportation analysis presented by the Appellant has demonstrated that the development will provide suitable active travel interventions (with the addition of the public transport contributions discussed below) to facilitate access to and from the site via sustainable modes.

3.4.9 This position is fully supported by the LHA who were satisfied with the transportation analysis which has been carried out relation to sustainable accessibility, and agreed that suitable interventions could be provided. The LHA subsequently made a recommendation to approve the application with no objection, subject to several planning conditions and contributions.

3.5 Public Transport

3.5.1 Mr Bailes (on behalf of NoRCA) provides the following comments with respect to the accessibility of the site by public transport:

“In respect of Public Transport, the TA is incorrect and misleading on the assumptions that the site is accessible by bus. The TA asserts that nearest bus stops in the vicinity of the site are located immediately adjacent to the site on Hither Green Lane at The Abbey Hotel and Dagnell End Road (c.300 metres to the west of Hither Green Lane / Dagnell End Road junction). It also states in section 3.8.2 that bus services are limited, with one service a day serving the bus stops, the S83 and S55 services. Both services are school buses and are not available for public use. As a result, there are no public bus services adjacent to the proposed residential site.

The TA also mentions that further bus services are accessible on the A441 (Birmingham Road) 500 metres distant from the site, which can be accessed by the pedestrian link between the A441 and Hither Green Lane. The bus route serving these stops is extremely limited and offers only five services a day on weekdays to Bromsgrove. Furthermore, the distance of 500 metres mentioned in the TA is incorrect and the distance to the middle of the proposed development site (true reflection) is over 700 metres.”

3.5.2 Mr Bailes (on behalf of NoRCA) also goes on to state the following:

“it is clear that there are no viable bus services within a recommended walking distance to encourage residents to catch a bus instead of using their car. ”

3.5.3 As detailed within the TA Addendum Report (CD B35) submitted April 2023, the application has committed to a contribution towards the provision of a diverted bus service into the site. WCC provide the following comments on this matter in their latest response of no objection to consultation on the application (CD I11):

“To meet with NPPF and Local Plan policy requirements, a new bus service is proposed. It has been agreed that the Diamond 62 Service will be routed into the site, as the 63 Service.”

3.5.4 The potential opportunities for access to and from the site by public transport has been overlooked in Mr Bailes' PoE. The proposed improvements will also benefit residents of Hither Green Lane and Dagnell End Road, by providing a frequency bus service within an accessible distance of existing dwellings, thereby improving opportunities for travel by sustainable modes in the vicinity of the proposed development site. This matter is discussed by WCC on Page 47 of the planning committee report (CD C1), where the following is stated:

“The bus will not only benefit new site residents but provide a wider opportunity for mode shift in surrounding residential sites. Access to Redditch Railway Station will now also be possible through the provision of this bus.

3.6 Travel Plan

3.6.1 Further to the above, and as detailed within my main PoE (**Section 3.3**), a RTP has been submitted as part of the planning application (CD A20), which outlines a commitment from the Appellant to promote and monitor the use of sustainable travel at the site. This has been agreed by WCC with a condition to secure its implementation also agreed.

3.6.2 As outlined in Page 49 of the planning committee report (CD C1):

“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. A planning condition is included with this response to ensure appropriate commitment and measures are implemented. “

3.7 Summary

3.7.1 I have reviewed the comments provided in Mr Bailes' PoE, and note that these fail to take account of the vast majority of the sustainable transport interventions that the Appellant is promoting to provide genuine modal choice for all site users, and existing local residents.

3.7.2 As demonstrated within this RPoE, my main PoE, and the documents submitted through the course of the determination of the planning application, the site is situated in a location that can be made sustainable, and there are multiple interventions that the Appellant is promoting that will improve access between the site and Redditch for pedestrians, cyclists and public transport users. Furthermore the proposals allow for the accommodation of each user group within the site layout and through the provision of adequate parking for cycles and electric vehicles for each dwelling.

- 3.7.3 The various mitigation measures have been consulted on at length with WCC who have responded to the application positively; accordingly, I consider that access to the site by sustainable means can be adequately secured.
- 3.7.4 This position is also fully supported by the LHA who were satisfied with the transportation analysis carried out in relation to sustainable accessibility and agreed that interventions could be provided to provide suitable opportunities for sustainable access to and from the site. The LHA subsequently made a recommendation to approve the application with no objection, subject to several planning conditions and contributions.
- 3.7.5 To conclude this point, I would like to draw to the attention of the Inspector the following comments made by WCC on Page 49 of the planning committee report (CD C1):

“A package of offsite work and financial contributions as described by the WCC Highways are proposed via legal agreements to ensure any impacts on the network are mitigated.”

“It is noted that objectors are concerned with a range of highway issues; however, based upon the response from WCC Highways, there are no justifiable grounds on which an objection could be maintained on highway grounds.

Therefore, it is considered that the proposed development would deliver sustainable development in accordance with the requirements of Local Plan Policies 19, 20 and 22 and the NPPF. “

4. Dagnell End Road / A441 Signalised Junction

4.1 Preamble

4.1.1 As part of this rebuttal, I have reviewed NorCA's Statement on Highways and Transport Aspects (January 2025); which is included as Appendix A of their PoE. Specifically, this Chapter of the rebuttal considers NoRCA's comments regarding the baseline traffic data used to inform the detailed capacity assessment of the Birmingham Road/Dagnell End Road signalised junction.

4.2 2018 Traffic Data – Brockhill East

4.2.1 Within Appendix A of the PoE, Mr Bailes (on behalf of NoRCA) makes reference to results set out within the initial TA (CD A21) submitted as part of the first suite of documents to validate the planning application; which was prepared in October 2021.

4.2.2 As set out in my main PoE (**Section 4.3**), during the period in which the TA was being prepared the UK was still in a transitional period with respect to daily travel patterns on account of the COVID-19 pandemic. Many LHAs were therefore contesting the validity of any traffic survey data collected during this time. In the absence of being able to conduct up to date representative traffic surveys, traffic flows were obtained from the TA for the adjacent Brockhill East development (CD 15).

4.2.3 Through the course of the determination period, several additional documents were prepared by the Appellant in response to comments raised by WCC in relation to the development proposals. A summary of the comments raised by WCC and the additional transport documents prepared by the Appellant is set out in my main PoE (**Section 2.2**).

4.2.4 In this regard, attention should be brought to TN003 (CD 113) prepared in December 2022, which noted that (at the time of preparing the TN), the survey data was 4 years old, and therefore may not provide an accurate indication of the current traffic profile at the junction. Previous DfT 'Guidance on Transport Assessments' (2007), Paragraph 4.18 stipulated that assessments should "include recent counts (normally surveyed within the last three years) for peak periods turning movements at critical junctions".

4.2.5 Guidance on Transport Assessments was withdrawn in 2014, with alternative guidance in terms of highway assessments now provided by Planning Practice Guidance; specifically, 'Travel Plans, Transport Assessments and Statements in Decision Taking'. The updated documentation does not stipulate a specific timescale for which survey data can be considered representative, however the 3-year timescale outlined within the previous DfT guidance is still considered pertinent in this regard.

4.3 2022 Traffic Survey Data

4.3.1 Given the age of the survey data obtained from the Brockhill East application (4 years at the time TN 003 was prepared), updated traffic surveys have been obtained along the local highway network in the vicinity of the junction.

4.3.2 Turning counts surveys were undertaken at the Dagnell End Road / Birmingham Road junction on Tuesday 15th November 2022, covering the periods from 07:00 – 10:00 and 16:00 – 19:00. In addition to this two Automated Traffic Counts (ATCs) were undertaken on Dagnell End Road and the Birmingham Road link south of the junction for a 7 day, between 15th November and 22nd November 2022. A full detailed consideration of this data is set out in my main PoE (**Section 5.3**).

4.3.3 The traffic survey was obtained via an independent third-party survey company, who specialise in the collection of traffic survey data, and was undertaken during a period of free-flowing traffic, with no roadworks at the junction.

4.3.4 It is noted in this regard, that within Appendix A of the PoE, Mr Bailes (on behalf of NoRCA) makes no reference to TN003 (CD I13) submitted as part of the application, which is focused entirely on the detailed capacity analysis of the Dagnell End Road / A441 and the rationale for the collection of updated traffic survey data.

4.3.5 Within Appendix A of the PoE, Mr Bailes (on behalf of NoRCA) has raised the following comments around the presence of roadworks on the A441, Birmingham Road, and the potential impact upon traffic surveys obtained in November 2022.

“The applicant only refers to the effects of COVID-19 pandemic – what is more important is both the applicant and WCC have failed to recognise that the A441 Birmingham Road between Cobbs Barn Farm roundabout and the Sainsbury’s Roundabout had major

roadworks along its length for 7 months which only finished at the beginning of November 2022. After the completion of the roadworks there were water leaks and snagging problems throughout November 2022, all requiring traffic signals in operation along the A441.”

4.3.6 As outlined above, and detailed within my main PoE (**Section 5.3**), the traffic survey data was undertaken during a period of free-flowing traffic, with no roadworks at the junction.

4.3.7 Furthermore, the resultant traffic survey data for both the AM and PM peak periods has been provided to WCC Highways, who have validated the surveys using their own data collected from their own permanent traffic data, and confirmed that background traffic data on the local highway network has indeed, reduced, when compared to the surveys undertaken as part of the previous application at Brockhill East Phase 3.

4.3.8 WCC have therefore confirmed that the background survey data is valid for use as part of the junction capacity assessment. As part of WCC Highways formal response in June 2023 (CD 17, Page 4) the following comments were provided in relation to the traffic data.

“Compared to the background traffic flows surveyed and used in the LinSig model for the Brockhill Phase 3, traffic flows have since slightly reduced post-covid and this has been confirmed by the Highway Authority’s own permanent traffic counter, which is positioned on the A441 to the north of the Dagnell End Road junction (the northern arm of the junction). Several months’ worth of data was obtained to verify this.”

4.3.9 A detailed overview of the junction capacity assessment for the Dagnell End Road / A441 signalised junction is discussed in TN 003 (CD I13, Pages 14 - 16), and outlined in my main PoE (**Table 5.1**),

4.3.10 The results of the junction capacity assessment demonstrate that the proposed development will have a minor impact on the operation of the Dagnell End Road / Birmingham Road junction, and that no further mitigation is therefore deemed necessary. This matter has been discussed and agreed with WCC Highways, with the following statement provided in their revised officers response in June 2023 (CD 17, Page 8):

“The Highway Authority concludes that there would not be a severe impact and therefore there are no justifiable grounds on which an objection could be maintained”.

4.4 2024 Traffic Survey Data

4.4.1 Notwithstanding the position of WCC in their consideration of the planning application, I note the concerns raised by Mr Bailes on behalf of NoRCA in relation to the baseline traffic data used to inform the detailed capacity assessment of the Birmingham Road/Dagnell End Road signalised junction; both in the Planning Committee Briefing Note and subsequently within Appendix A of NoRCA’s PoE.

4.4.2 Within the Planning Committee Briefing Note, Mr Bailes states the following:

“in order to validate the view that the roadworks suppressed traffic flows at the A441/Dagnell End Road junction a traffic count at the junction was undertaken on the 12th March 2024 for the morning peak hour 0800-0900. The results of the traffic count are given at Annex 1. “

4.4.3 It is noted that these surveys focus solely on the AM peak, without any rationale given as to why the PM peak flows have been omitted, or why indeed these were not considered.

4.4.4 Furthermore, as noted in Section 3.2 of this RPoE, the traffic survey data obtained in November 2022 (which forms the basis of assessment work submitted as part of the application) has been obtained by an independent third party data collection company who are impartial and have no vested interest in the outcome of the assessment work. In this regard, no details have provided as to by whom the March 2024 data has been collected by, and in particular whether it has been undertaken by a suitably qualified independent expert, so that this data can be considered impartial.

4.4.5 For completeness, following the planning committee, I obtained a further traffic turning count on Thursday 25th April 2024 covering both the AM and PM peak periods. The traffic data has been collected by an independent third party data collection company and is included in Appendix C of my main PoE. This has formed the basis of a sensitivity modelling scenario, which is detailed in my main PoE (**Table 5.2**), and summarised in Section 3.5 of this RPoE, for ease of reference.

4.4.6 Notwithstanding the above, I also note that in Appendix A of the PoE, Mr Bailes on behalf of NoRCA states the following:

To further validate the erroneous nature of the November 2022 traffic flows and the incorrect use of the data in assessing the impact of the proposed development on the A441/Dagnell End Road junction, a series of independent traffic counts have been undertaken at the junction. Morning (AM) peak hours turning traffic counts were undertaken at the A441/Dagnell End Road junction on Tuesday 12th March 2024 and Thursday 21st November 2024. In addition, observations were made of the traffic queues at the junction. The surveys were undertaken by residents under my supervision, where I am bounded by the “TPS Code of Conduct - dated June 2022”.

4.4.7 As per my comments noted above in relation to the March 2024 data presented by Mr Bailes on behalf of NoRCA, no rationale has been given as to why the PM peak flows have not been considered, or why the full raw count data has not been provided for consideration. Furthermore, it is noted that this was collected by residents (potentially members of NoRCA), and not by an independent third-party.

4.5 Modelling Parameters

Growth Factors

4.5.1 As detailed within my main PoE (**Section 4.3**), Background traffic growth has been calculated using TEMPro for a 2030 future year, consistent with the end of the current Redditch Local Plan period.

4.5.2 Committed development trips associated with Webheath and Foxlydiate were obtained from the Brockhill East Phase 3 modelling work and included within the 2030 future year assessments. In the TA for the approved Brockhill East Phase 3, in order to avoid ‘double counting’ of traffic, alternative assumptions were applied to the growth factors to deduct the committed development trips.

4.5.3 As part of the growth factors applied within the modelling work for the proposed development at Hither Green Lane, no alternative assumptions have been applied to the TEMPro growth factors used which is considered to be 'overly robust', given that there is likely to be an element of double counting of committed development trips. This approach was discussed and agreed with WCC.

Stage Sequences

4.5.4 As set out in technical notes 'Dagnell End Road – Junction Design Note' (CD I3, Pages 5-6) and 'Dagnell End Road – Junction Design Modelling Update' (CD I2, Page 6) submitted as part of the Brockhill East application, peak hour pedestrian crossing demand at the new signalised crossing was forecast to be low, and it was anticipated that the crossing would therefore be called infrequently.

4.5.5 In light of the above, the modelling submitted as part of the approved application for Brockhill East included 3 stage sequences. This approach has also been undertaken as part of the modelling for the proposed development. These are as follows:

- Staging Sequence 1 – Pedestrian Crossing Not Called;
- Staging Sequence 2 – Pedestrian Crossing Not Called, No Filter Arrow; and,
- Staging Sequence 3 – Pedestrian Crossing Called Every Cycle (Sensitivity Test).

4.5.6 Pedestrian demand at the junction is relatively low and therefore as specified in the PJA Junction Design Modelling Update TN (CD I2, Page 6) submitted as part of the approved Brockhill East Phase 3 application, it is highly unlikely the crossing will be called every cycle. The results presented for stage sequences 1 and 2 are considered to be the most representative of the typical day-to-day operations of the junction.

4.5.7 This matter was detailed within the TAs (CD A21 and CD B1) and the subsequent TNs (CD I12 and CD I13) and discussed and agreed with WCC both as part of the current application and for the purpose of the approved application for Brockhill East Phase 3. The A441 / Dagnell End Road junction was therefore modelled with consideration of each of the 3 Stage Sequences in mode's TA, to replicate the modelling scenarios used for the purpose of the Brockhill East Phase 3 application.

4.5.8 In spite of this, I note that in both documents prepared by Mr Bailes; the Planning Committee Briefing Note and Appendix A of the PoE, focus is placed solely on Stage Sequence 3 (Pedestrian Crossing Called Every Cycle (Sensitivity Test)). No consideration is given by Mr Bailes to the results of either Stage Sequence 1 or Stage Sequence 2; both of which are considered to be most representative of the typical day-to-day operation of the junction.

Sensitivity Modelling

4.5.9 Notwithstanding the above, In order to address the comments raised by NoRCA at the planning committee, I have used the results of the traffic turning count on Thursday 25th April 2024 to present further scenarios of the capacity assessment completed at the Dagnell End Road / Birmingham Road junction; replicating the analysis already submitted for every parameter with the exception of the baseline count data.

4.5.10 As detailed within my main PoE (**Section 5.5**), this analysis is considered to be worse than the reasonable worst-case scenario as there is further risk of double counting of traffic as there will have been occupations at committed development sites between 2018 and 2024 and I have not adjusted the committed development assumptions to account for this. Nor have I adjusted the planning data assumptions in the TEMPRO data forecasts when accounting for background traffic growth.

4.5.11 Furthermore the committed developments, and proposed development, will be required to encourage modal shift through the provision of sustainable transport infrastructure and travel planning techniques. There has been no account of the positive influence that this could have on trip forecasts in any of the modelling completed adding another layer of robustness to the analysis completed.

4.5.12 The results of this analysis are summarised in my main PoE (**Table 5.2**) assuming a horizon year (2030) base inclusive of all committed developments and a horizon year base plus development proposals for each variant of traffic signal staging sequence previously presented as part of the planning application.

4.5.13 As detailed within my main PoE (**Section 5.5**), the results of the sensitivity modelling demonstrate that the impact of the proposed development is not of a magnitude which can be considered to be severe across any of the modelled scenarios; and accordingly and in line with paragraph 116 of the NPPF (CD F1) the severe benchmark is not breached in any reasonable scenario considered.

4.6 Queue Commentary

4.6.1 I note that Mr Bailes describes in his PoE how queues are regularly observed stretching back more than 500m on the A441 from the A441/Dagnell End Road junction. Assuming a PCU length of 6m, this equates to queues of 83+ PCU. Mr Bailes provides further commentary that the queue on the A441 south arm of the junction has in fact been observed at 700m length (116 PCU).

4.6.2 I now turn to the queue lengths reported in each with development scenario tested as presented in the TA (CD A21) and in my main PoE (**Section 5**) for both the A441 North and South arms of the junction assuming the committed mitigation proposals have been delivered. The results of this analysis are summarised in **Tables 4.1** and **4.2**.

Table 4.1 Summary of Queues (A441 North Arm)

Scenario	AM Peak (PCU)	PM Peak PCU)
2030 Base + Com + Dev (SS1) – 2018 Base Data	42	42
2030 Base + Com + Dev (SS2) - 2018 Base Data	73	42
2030 Base + Com + Dev (SS3) - 2018 Base Data	82	89
2030 Base + Com + Dev (SS1) – 2024 Base Data	24	51
2030 Base + Com + Dev (SS2) - 2024 Base Data	24	51
2030 Base + Com + Dev (SS3) - 2024 Base Data	53	92

Table 4.2 Summary of Queues (A441 South Arm)

Scenario	AM Peak (PCU)	PM Peak (PCU)
2030 Base + Com + Dev (SS1) – 2018 Base Data	72	159
2030 Base + Com + Dev (SS2) - 2018 Base Data	81	159
2030 Base + Com + Dev (SS3) - 2018 Base Data	73	159
2030 Base + Com + Dev (SS1) – 2024 Base Data	22	38
2030 Base + Com + Dev (SS2) - 2024 Base Data	22	38
2030 Base + Com + Dev (SS3) - 2024 Base Data	25	40

- 4.6.3 The junction, with mitigation installed, has been demonstrated in multiple scenarios to operate with comparative or lower queues on the A441 approaches than the junction has been regularly observed to experience by Mr Bailes. The horizon situation is therefore arguably an improvement to the situation currently on street.
- 4.6.4 The exception to this is the A441 South arm in the PM peak hour when the various traffic modelling scenarios are considered relative to 2018 baseline traffic survey data.
- 4.6.5 In acknowledgement of the age of the source data (2018) I have presented revised traffic survey data (2022 and 2024) covering the AM and PM peak hours. Mr Bailes has not presented any revised traffic survey data covering the PM peak hour and accordingly I rely upon my April 2024 traffic survey data as the most complete up to date source of data for the affected junction location. When considered in relation to the 2024 traffic survey data the resultant modelled queues on the A441 south arm of the junction are approximately half the length of those reported as observed under current conditions (i.e. better than the extant situation).
- 4.6.6 Whilst I acknowledge that the junction is not forecast to operate within capacity in the horizon year it is not the place of the planning system to ensure the convenience of the motorist as demonstrated in the case of Land North of Holt Road, Wrexham (PINS Reference: APP/H6955/A/19/3238470) where the following was stated:
- “It is not the function of the planning system to ensure that the convenience of the private car user is safeguarded from congestion, especially existing congestion.”*
- 4.6.7 I have already provided my views as to the severity of impact arising from the development proposals when considered against the metric of driver delay in my PoE; however, when also considering queues on the A441 as observed regularly by Mr Bailes, the evidence overwhelmingly points towards an, at worst comparable, and typically improved situation in the with-development scenario modelling presented. This is despite the development scenario tested including the cumulative of baseline traffic, background growth, various committed developments and the proposed development traffic.
- 4.6.8 This conclusion is contingent upon the proposed mitigation scheme at the A441/Dagnell End Road junction being delivered and a draft planning condition was requested by the highway authority to limit occupations until the works have been delivered.

4.7 Linking of Adjacent Junctions

- 4.7.1 Mr Bailes raises the implications of traffic blocking back from the A441/Dagnell End Road junction to the A441/Odell Street/Weights Lane junction.
- 4.7.2 The assessment methodology followed was agreed with the highway authority and replicates that already agreed in their determination of the Brockhill East application.
- 4.7.3 Focussing on the A441 South arm of the A441/Dagnell End Road junction a queue length of c.300m+ (or 50 PCU's+) will result in blocking of the northbound exit from the A441/Odell Street/Weights Lane junction.
- 4.7.4 **Table 4.2** summarises modelled queue lengths on the A441 South arm of the junction. Using the most recently collected April 2024 traffic survey data modelled queue lengths do not exceed 40 PCU's in any of the scenarios considered and hence do not reach back to the A441/Odell Street/Weights Lane junction.

5. Summary & Conclusion

5.1 Overview

5.1.1 I have prepared this RPoE to assist the Inspector in dealing with matters raised by Mr Bailes on behalf of NoRCA.

5.2 Summary

5.2.1 I have reviewed the evidence submitted and the principal highways and transportation points can be split into two key headings:

- Site accessibility and modal choice; and,
- Assessment of development traffic impact at the A441 / Dagnell End Road signalised junction.

Sustainable Accessibility and Modal Choice

5.2.2 I have reviewed the comments provided in Mr Bailes' PoE, and note that these fail to take account of the vast majority of the sustainable transport interventions that the Appellant is promoting to provide genuine modal choice for all site users, and existing local residents.

5.2.3 As demonstrated within this RPoE, my main PoE, and the documents submitted through the course of the determination of the planning application, the site is situated in a location that can be considered to be sustainable, and there are multiple interventions that the Appellant is promoting that will further improve access between the site and Redditch for pedestrians, cyclists and public transport users. Furthermore the proposals allow for the accommodation of each user group within the site layout and through the provision of adequate parking for cycles and electric vehicles for each dwelling.

5.2.4 The various mitigation measures have been consulted on at length with WCC who have responded to the application positively; accordingly, I consider that access to the site by sustainable means can be adequately accommodated.

Traffic Impact at Dagnell End Road / A441 Junction

- 5.2.5 As part of the transport evidence submitted during the determination of the application, the modelling of the A441 / Dagnell End Road signalised junction was subject to a series of discussions with WCC.
- 5.2.6 Following discussions with WCC, updated turning counts surveys were undertaken at the Dagnell End Road / Birmingham Road junction on Tuesday 15th November 2022, owing to the time which had elapsed since the collection of the 2018 survey data obtained from the Brockhill East application.
- 5.2.7 The traffic survey was obtained via an independent third-party survey company, who specialise in the collection of traffic survey data, and was undertaken during a period of free-flowing traffic, with no roadworks at the junction. The resultant traffic survey data for both the AM and PM peak periods has been provided to WCC Highways, who have validated the surveys using their own data collected from their own permanent traffic data.
- 5.2.8 The results of the junction capacity assessment demonstrate that the proposed development will have an impact on the operation of the Dagnell End Road / Birmingham Road junction, albeit the magnitude of this cannot be considered as severe, a position agreed with WCC Highways.
- 5.2.9 Notwithstanding the position of WCC in their consideration of the planning application, it is noted that concerns have been raised by NoRCA in relation to the baseline traffic data used to inform the detailed capacity assessment of the Birmingham Road / Dagnell End Road signalised junction.
- 5.2.10 Nonetheless, owing to the comments raised by Mr Bailes, following the planning committee I obtained a further traffic turning count on Thursday 25th April 2024 covering both the AM and PM peak periods. The traffic data has been collected by an independent third party data collection company. This has formed the basis of a sensitivity modelling scenario, which is presented within my main PoE.
- 5.2.11 The results of the sensitivity modelling demonstrate that the impact of the proposed development is not of a magnitude which can be considered to be severe across any of the modelled scenarios; and accordingly and in line with paragraph 116 of the NPPF (CD F1) the severe benchmark is not breached in any reasonable scenario considered.

5.3 Conclusion

5.3.1 In light of the information presented during the course of the applications determination, and as summarised in my main PoE and this RPoE, I would respectfully request that the appeal is allowed, as the proposals are fully in line with the guidance set out in the NPPF, namely:

- Opportunities to promote sustainable transport modes have been taken up;
- Safe and suitable access to the site can be achieved; and,
- The development will not have a severe impact on the operation or safety of the surrounding highway network.

5.3.2 This position is further supported by RBC in their role as LPA and WCC in their role as LHA, who were satisfied that the transportation impacts of the scheme have been appropriately considered and made a recommendation to approve the application with no objection subject to several planning conditions and obligations.