

To: Paul Lester

Planning Application Reference: 21/01830/FUL

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 | B98 9AZ

Comment Date: 28th June 2023

1. Introduction

On the 2nd May 2023 Redditch Borough Council issued a reconsultation notice for the above planning application. The reason for the reconsultation exercise is that amendments to the original development proposals have been received from the applicant. An Amended Information Cover Letter dated 25th April 2023 has been submitted, together with a series of additional reports and plans.

Having undertaken a full and robust assessment of the additional information submitted by the applicant, and in particular the Design and Access Statement Design (ME-24-40E) and the Transport Assessment Addendum (TAA) dated April 2023, I have still concluded that the proposals are contrary to both national planning policy and the Borough of Redditch Local Plan. As a result, **my formal objection to this planning application remains entirely valid.**

Set out below is the evidence and reasoning why the supporting evidence is not robust and paints a misleading picture of the effects of the proposed residential development. Accordingly, the planning application is still contrary to both national and local policies.

2. Design and Access Statement (ME-24-40E)

During the initial consultation period it was pointed out that the information provided within the original Design and Access Statement (ME-24-40C), which attempted to indicate that proposed residential development site is in a sustainable location, was wrong. Despite pointing out many mistakes the latest Design and Access Statement (ME-24-40E), submitted in April 2023, has not rectified the errors.

The latest Design and Access Statement (DAS) states that:

“by virtue of its position the site has excellent access to the various bus stops along the B4101 and A441. These have direct links to Birmingham so the development site is perfectly positioned to promote public transport use. The immediate area is served by a good range of bus services to various destinations, including:

- 143, Bromsgrove;
- X3, Kidderminster;
- 350, Worcester;
- 26, Stratford-upon-avon; and
- 146/150, Birmingham.”

Not one of these quoted bus numbers runs to/from Redditch Town Centre – as was confirmed by the applicant’s own Transportation Assessment (TA). The 146 to Birmingham was axed about two years ago and the 150 terminates in Kings Heath not 'Birmingham' (and via the Alexandra Hospital

and the A435 not the A441). It appears that the error is derived from using a map of bus routes that is years out of date.

The only buses that stop on the A441 opposite the Abbey stadium and further along into Bordesley Village are the 182 and 183 but with only two services a day for each stop and, to quote Redditch Planning Department's comment, '*not at a time suitable for typical 9-5 employment commuting*'.

It is clear that the DAS is still incorrect and totally misleading as to the current situation, as noted in the applicant's own TA. It thus completely fails to provide a cogent argument in favour of the sustainability of the site and its ability to seek to reduce the need to travel and secure modal shift towards sustainable modes of travel.

3. Traffic Impact

The original Transport Assessment, dated October 2021, exposed that the A441/Dagnell End Road traffic signal junction in 2030, with the development traffic included, reduced the capacity of the junction by some 5%. The results from the junction modelling (for the sensitivity test where the pedestrian crossing facility is called every signal cycle) are set out in the original TA (October 2021) at Table 6.6, where the results have been extracted and set out in the **Table 3.1** below.

Table 3.1 A441/Dagnell End Road junction modelling results for the Design Year 2030

Arm	AM Peak Hour			PM Peak Hour		
	Degree of Saturation	Mean Max Queue (PCU) ¹	Ave delay/PCU (secs)	Degree of Saturation	Mean Max Queue (pcu)	Ave delay/PCU (secs)
2030 Base Assessment						
A441 (N)	106.6%	82	157	98%	50	65
Dagnell End Road	100.8%	13	105	111.7%	55	281
A441 (S)	99.8%	51	61	111.1%	127	232
Practical Reserve Capacity	-18.4%			-24.1%		
2030 Base + Development Traffic Assessment (ped crossing called every cycle)						
A441 (N)	112.3%	113	244	106.5%	89	168
Dagnell End Road	105.2%	22	150	114.2%	66	315
A441 (S)	103.4%	73	106	116.2%	159	308
Practical Reserve Capacity	-24.7%			-29.1%		

The increase in the reduced practical reserve capacity (PRC) due to the proposed residential development is substantial and consequently would lead to significant additional queues and delays to those already experienced at this busy junction, thus having a "severe" impact on the junction and contrary to the National Planning Policy Framework (NPPF).

The junction modelling in the October 2021 TA was based upon traffic flows obtained from the Transport Assessment associated with the Brockhill East site (PJA TA 'Land at Brockhill East' Phase 3 June 2019) and approved by Worcestershire County Council.

¹ PCU – is a passenger car unit (pcu) where one car is considered as a single pcu and a HGV/bus is 3 pcu's.

The latest assertions from the applicant through the TAA has now attempted at section 3, to rerun the junction modelling using a different set of traffic survey data. The modelling of the A441/Dagnell End Road junction has now been based on traffic surveys undertaken on Tuesday 15th November 2022. Within the TAA at section 2.3.2 it states:

“The updated traffic surveys provide a more accurate indication of current travel plans and take account of sustained changes in the type and scale of travel patterns which have occurred in the UK since the onset of the COVID-19 pandemic.”

And goes on to state at 2.3.5 that:

“WCC have consented to the use of the updated survey data for the purpose of the updated LinSig junction,”

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. As part of the major roadworks Severn Trent Water, who were laying a new major water main, implemented Matrix signs at both the Cobbs Barn Farm and Sainsbury’s roundabouts stating that *“due to major roadworks on the A441 Birmingham Road drivers are asked to seek alternative routes”*. It was noticeable by residents that throughout the 7 months of continual major roadworks traffic queues and delays the traffic flows were significantly reduced.

In order to evidence this irregularity, an assessment of the TA traffic flows, and TAA traffic flows used in the relevant traffic signal analysis are set out in the **Tables 3.2 to 3.4** below.

Table 3.2 A441/Dagnell End Road Junction Comparison of Base Traffic Counts

Total Inflow to the traffic Signal Junction (vehs)		
Year	AM Peak Hour	PM Peak Hour
2018/19 (Original TA) ²	2,426	2,512
2022 (TAA) ³	1,671	1,741
Difference	-755 (-31%)	-771 (-30%)
Total reduction of 30% traffic entering the junction with the November 2022 Traffic Surveys which followed the major 7 months roadworks programme.		

It is clearly evident from **Table 3.2** that the total traffic through the A441/Dagnell End Road junction **in November 2022 is reduced by 30%** when compared to the pre pandemic and roadwork traffic flows. It is obvious therefore that with such a massive reduction in traffic flows there can be no way that levels can be seen to have reverted back to what can be considered normal. Therefore, contrary to section 2.3.2 of the TAA, the November 2022 traffic surveys do not provide a more accurate indication of current travel plans and take account of sustained changes. (my emphasis)

² Source: PJA – Technical Note – A441/Dagnell End Road Junction Modelling – July 2019: Appendix – Traffic Flow Diagram.

³ Source: Email from Planning Officer dated 12/6/23.

In examining the base traffic levels and patterns further a detailed review of the specific turning counts and movements for each approach arm at the junction has been undertaken, whereby **Table 3.3** sets out the outcome of the review.

Table 3.3 Turning Count Comparison of Base Counts

ARM	Turning Flow (vehs)								
		To Birmingham				To Redditch			
		AM Peak		PM Peak		AM Peak		PM Peak	
Dagnell End Road		2018/19	2022	2018/19	2022	2018/19	2022	2018/19	2022
		183	113	356	155	183	155	216	158
B'ham Rd (N)		To Beoley				To Redditch			
		192	138	123	103	868	604	723	550
B'ham Rd (S)		To Beoley				To Redditch			
		201	125	148	127	799	533	946	648

Source: as footnote

The comparison of travel patterns, via turning movements, at the A441/Dagnell End Road reveals that there are significant reductions in traffic volumes on all arms of the junction in 2022 compared to earlier traffic counts before the major roadworks. The reduction in traffic flow at the junction as shown as a percentage is given at **Table 3.4**.

Table 3.4 Turning Count Comparison shown as a percentage.

ARM	% Difference in Traffic Flows				
		To Birmingham		To Redditch	
		AM Peak	PM Peak	AM Peak	PM Peak
Dagnell End Road		-28%	-56%	-14%	-26%
	B'ham Rd (N)	To Beoley		To Redditch	
		-28%	-16%	-30%	-24%
B'ham Rd (S)	To Beoley		To Redditch		
		-38%	-14%	-33%	-32%

Note – figures in orange relate to over 30% difference.

Table 3.4 shows that individual turning flows are between 14% and 56% less in 2022 than in 2018/9. The largest reduction is on the movement from Dagnell End Road to the Birmingham, which is not surprising given the fact that during the road works traffic could not get onto the Birmingham Road due to traffic queuing back from the roadworks traffic lights and blocking the junction.

It is obvious that traffic had not returned to anything near normal by the time the traffic surveys were undertaken on 15th November 2022. It is also notable that the heavy traffic flows on the Birmingham Road are significantly reduced by 24% to 33% clearly indicating that traffic had heeded the traffic matrix signs and avoided the area. It is also important to note the sporadic reappearance of roadworks traffic lights during November 2022 did not reassure drivers that the operation of Birmingham Road was back to normal.

It is incredulous that the highway authority did not seek to check the duration, length and type of roadworks in the area, together with its impact on traffic, before consenting to updated traffic surveys. It appears highly likely that neither the applicant nor the Development Control Section of

WCC were aware of the impact the major roadworks was having on travel patterns along the A441 Birmingham Road as demonstrated above.

Taking the November 2022 traffic flows as the updated background traffic data and to inform the revised junction modelling as set out in in the TAA at section 2.3.6 to 2.3 7 and then to state:

“The capacity assessment outlined within this TN demonstrates that junction will operate within acceptable capacity parameters following the introduction of the development proposals, and no further mitigation is therefore deemed necessary.”

is entirely wrong. It is equally incorrect for the local highway authority to:

“indicate that they are accepting of the development traffic impact at the junction and accordingly no mitigation, nor monies, towards mitigation have been requested to address capacity concerns.”

To base these statements upon unreliable and erroneous traffic data (as clearly demonstrated above) is totally wrong and completely misleading. It would result in severe consequences to the residents who live in the area.

The November 2022 traffic flow data should be inadmissible in any assessment of the impact of traffic from the proposed residential development on the surrounding highway network. The comments made in my 9th February 2022 submission still remain valid and justifiable. The cumulative impacts on the road network resulting from the Hither Green Lane proposed development can only be seen as severe. As a result, the proposed residential development is contrary to the National Planning Policy Framework paragraph 111 and the Borough of Redditch Local Plan Policy 20.

4. Bus

In what appears to be a desperate attempt to try and make the proposed residential development site sustainable, the TAA has tried to devise a set of proposals aimed at promoting opportunities for sustainable travel to and from the site by way of bus service. The TAA at section 3.2.2 states:

“It was therefore determined that a bus service would need to be diverted into the site, in order to provide an effective hourly service within an acceptable distance for prospective residents and visitors at the site. The service will provide connections between the site and Redditch Town Centre, as well as to several major employment hubs in the vicinity of the town centre.”

And goes on to state:

“The diversion of the bus service is to be delivered by WCC and the local operator (Diamond Bus), with an appropriate contribution to be provided by the developer, which will be secured by S106.”

Whilst it sounds like the site will be well served by bus in the future, it is in reality a limited service. In mode shift terms, an hourly service and only serving the town centre and so called unnamed “major employment hubs in the vicinity of the town centre” is extremely vague and is not considered adequate to persuade commuters, shoppers or leisure travellers transferring from private car to the bus.

There is no correspondence with the local operator, Diamond Bus, confirming that they will operate a bus service so it can only be viewed as aspirational. Furthermore, there are no indications how much the bus service will cost, how much the applicant will need to provide to the S106 and how

long the subsidy will last. Given that this is a “full” application there is no certainty over the fact that the diverted bus service can be delivered and for how long.

In order to be successful, it is essential that the transport bus subsidies are sustainable and robust, this has not been demonstrated here.

Current experience appears to indicate that constant level of demand from circa 220 dwellings will be limited and would appear to cast doubt on the S106 funding being a success. In some reports there appears to be little correlation between the size of the site and the likelihood of Section 106 funding being a success. However, sites which no longer have S106 funded have seen the service provision reduced or not reinstated due to lack of patronage and appear to have been over-provided for in the first place.

The question the decision maker must ask is - what exactly is the bus service that may be delivered by the S106 bus service contribution, over what time period, and given the scale of the development, what guarantees are there that the service will be successful?

Whilst the TAA states that the site will be accessible by bus, the proposed bus service operation is not considered sufficient to guarantee an adequate shift from the private car to the bus to ensure that the site is sustainable in transport terms. In addition, the above points to the basic fact that the decision maker is not provided with the key evidence on bus service provision required to judge if the proposed development can be adequately serviced by bus service over the longer term.

5. Conclusions and Summary

Having undertaken a through and robust assessment of the Transport and Highway information contained in the Transport Assessment Addendum, dated April 2023, in support of the planning application, the information submitted in the TAA has clearly been shown to be totally misleading and therefore should be withdrawn. It is still my firm conclusion that the proposed residential development is contrary to both National Planning Policy Framework and the Borough of Redditch Local Plan policies. For this reason, the planning application should be refused.

As further information becomes available, I reserve the right to submit further information in support of my objection as both an individual and as Ward Councillor for Alvechurch South (which includes for parts of the A441/ Dagnell End Road traffic lights)

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and Ward Councillor for Alvechurch South.