

Bentley Pauncefoot Parish Council

Supplementary Comments on Hybrid Planning Application 16/0263

1. Introduction

1.1 Bentley Pauncefoot Parish Council's original response to the Hybrid Planning Application 16/0263 was made in anticipation of the imminent publication of further statements regarding Cross Boundary Development. However, the time implications of the Inspector's statement that he is now writing his report on the Bromsgrove District Plan with likely Main Modifications have prompted the Parish Council to present these additional comments. Nevertheless we reserve the right to present further comments once the Inspector has reported.

1.2 Despite the knowledge that the principle of development on the Green Belt site at Foxlydiate is under examination by a Planning Inspector and with the opposition to any such large scale urban extension clearly evident in numerous well researched submissions and backed by both local MPs, the application has been pushed forward by Heyford Developments Ltd and UK Land Developments Ltd. We therefore comment on their plans as follows:-

2. Outline Planning Permission

2.1 Bentley Pauncefoot Parish Council, on behalf of the residents of this parish, has consistently objected to the principle of the allocation of the Foxlydiate site for the construction of an estate comprising 2800 dwellings, a local centre, health facilities, a first school and the associated infrastructure. Its location within the Green Belt, its scale and cumulative effect are such that we do not consider it to represent a logical and sustainable option for the extension of the Redditch built up area. Our reasons for reaching this conclusion are well documented in the detailed submissions regarding the Housing Growth Development Study and the Bromsgrove District Plan made to Bromsgrove District Council and the Planning Inspector since 2013. The presentation of what could be considered premature planning documents relating to the site's development and suggested associated mitigation measures does not alter our perception that it would be inappropriate

to permit such development in the Green Belt. It follows therefore that we oppose the granting of outline planning permission for this site.

3. Detailed Access Application

3.1 The following comments in relation to the detailed Access application are made in the knowledge that the Inspector's report will be a crucial determinant of the principle of development at Foxlydiate and would be used to help inform the Secretary of State should the application be called in. In circumstances where the development proposals of the Local Planning Authority and developers are not accepted our comments will be superfluous but, should permission be granted, local knowledge should help "flesh out" the necessary mitigation measures.

3.2 We note that the outline application reserves all matters with the exception of vehicular points of access and principal routes within the site. The applicant chooses not to comment, at this stage, on proposed layout, scale, landscaping and appearance of the proposed development. Our observations may include some reference to these issues however, but only in the context of Access.

3.3 Despite the copious technical information and modelling regarding access to and from the site, it would seem, once more, that the picture presented is incomplete. The Highway Authority's Planning Response of January 2016 was followed by its formal recommendation on 20th April 2016 that planning permission should not be granted until further assessments of the impact of the development on the Strategic Road Network had been made. The fact that the appended technical note describes "inadequate trip rate calculation", "discrepancies", "significant simplifications" and "results skewed to a lower than realistic level" points, at best, to a rush to move ahead with the application.

3.4 We note also that maps presented in the Transport Assessment (Volume IV, Section 4, figs 4, 5 and 6) emphasize the flow of traffic eastwards and are based on the 2011 census figures regarding journeys to work from Webheath. It would seem at least likely however that some of the new residents at Foxlydiate would choose to work elsewhere than in Redditch. This point is borne out by comments in the Housing Growth Development Study (page 220, para 8.17) which envisages a greater volume of trips from this site to the Birmingham conurbation. The newly upgraded Bromsgrove station may also be a potential draw westwards. Although the Highway Authority does not, at present, regard trips westwards via the

Strategic Road Network i.e. via the A448 and A38 to M5 junction 5 as problematic, we consider that that the developer's transport proposals have not adequately addressed the significant effect that the likely increased volume of westward bound traffic would have on the narrow country lanes and minor roads surrounding the site.

3.5 Whilst the foregoing two paragraphs could be regarded as comment on the principle of site development which the application for outline planning seeks to establish, they are also relevant to the detailed Access application. It is possible, for example, to identify particular points within and adjacent to the proposed development which will be problematic and which we suggest should be given detailed consideration now. It is not sufficient that the Transport Assessment (Volume 4, Appendix 4A, Conclusions) should state that "additional highway trips will be generated that will impact on the surrounding network" and then go on to say that Worcestershire County Council will review them. One would expect good planning to seek to avoid or mitigate adverse effects.

3.6 We suggest, for example, that it is unclear how that part of the narrow, winding Cur Lane, outside the proposed site but adjacent to it, and accessed from it, will be safeguarded from the increased rat-running to and from the west which is a probability should the site be developed and which therefore should be a concern of both Council and developers. We have similar concerns about Gipsy Lane and Copyholt Lane, both accessed from Cur Lane. We do not see how the proposed revision to the route of Cur Lane immediately adjacent to Webheath will deter those intent on avoiding congestion by circumventing primary routes. Is it anticipated that access to certain types of vehicles will be restricted or that narrow village gateways will be constructed or is the nature of the lane itself seen as a deterrent?

3.7 The Cur Lane/Church Road/Great Hockings Lane/Foxlydiate Lane roundabout marks one of the major access points to the site. It leads to a short primary distributor road which is planned as a wide tree lined boulevard to access the whole development, swinging out to the north east and then to the north west, towards the only other major access point, the Birchfield road junction with the A448. However, although this is stated in the Transport Assessment Volume 1, (Main Text 4.5.1.) and the proposed route shown on the Access and Movement

Parameter Plan, (appendix 2A, Vol 11), the Land Use Masterplan Proposal, Option 10 seems to indicate that the nature of the road changes as it passes through the local centre. This prompts questions about its use as primary distributor and also about the apparent inbuilt flexibility of the route planning. Nevertheless, given the width of the proposed boulevard and its rise to both access points, we are of the opinion that, to mitigate visual intrusion and light pollution, forest trees should be planted as soon as possible in the road building programme and that low impact street lighting should be installed.

3.8 Having said this however, we expect the technical details of lighting, landscaping, cut and fill works, associated earthworks, drainage and utilities, crossings and surface water attenuation and drainage measures to be comprehensively addressed by specialists in their fields. Our comments in this report can only draw attention to our particular concerns.

3.9 A concern with visual intrusion is again a feature of our response to the development of the road network planned for the north wing. We accept that the Masterplan Option 10 only shows the approximate location of routes, buildings and open spaces but suggest that, whatever the final routes chosen, they will impact strongly on the exposed south west facing slopes. These are, at present, productive arable farmland which may need contour grading to accommodate the roads and which have very little natural vegetation or hedges in place to help screen the development from the wider countryside in its early years. The mitigation programme for the development of the main estate feeder route needs to be very carefully prepared with monitoring and maintenance plans incorporated.

3.10 There are plans to site the taller residential buildings alongside the A448 (cf. Webheath Landscape and Visual Assessment, part 2, p.84, 9.2.18) with potential increase in population density and vehicle numbers. Thus it is likely that roads in this area may be subject to increased pressure both from moving and static vehicles with additional consequent impact on junctions in rush hour. We must presume that the safety implications of this have been/will be addressed by the planners/developers.

3.11 We are particularly puzzled by the location of the proposed minor access point from Pumphouse Lane. Masterplan Option 10 indicates that the proposed

access diverts westwards from this Lane, utilising the route of a public footpath. It is anticipated that this will serve a small number of properties but could potentially be an alternative route for Buses and emergency vehicles (Transport Assessment Volume 1 Main Text 4.4.26). The Masterplan, however, seems to show that the description “access to a small number of properties” could embrace all development in the south wing. We accept that some form of barrier or road blocks could separate the “small number” from the rest but query therefore why it is envisaged as a bus or emergency route. The detailed map of the Pumphouse Lane Access indicates proposed localised widening at one point but gives no indication that the rest of this lane is unsuitable for increased vehicular movement, certainly not for buses. Its narrowness, bends, slopes and ford do not appear to have been taken into account, perhaps because they fall outside the development area.

3.12 A further ambiguity is noted in relation to a potential vehicular access to the new housing development planned within Redditch’s boundaries at Webheath, also from Pumphouse Lane and from a point virtually opposite to the proposed south wing site access. We suggest that there is a lack of transparency in the plans relating to road access from both sites to Pumphouse Lane and that adequate detailed planning has not been undertaken to consider the cumulative effect of their general use which would have a significant impact on traffic flow, safety and the environment both in Pumphouse Lane and in Webheath.

3.13 The only in-site road to connect the south and north wings of the Foxlydiat development will do so, it appears, via a bridge. We are of the opinion that this could easily be out of scale with the hillside and old lane cutting which it crosses, thus dominating the area. Mitigation of its impact as regards noise and appearance will be more difficult than if it was ground based.

3.14 The minor access in Foxlydiat Lane leads to what could be termed a clearly defined enclave at the junction of the two wings of development, linking it more firmly to the Webheath area than to the rest of the development from which it is separated by extensive green space and the primary distributor road. The land slopes downwards away from Webheath thus increasing the likely visibility of the development from afar and emphasizing the need, once more, for careful attention to mitigation measures. The linkage between Foxlydiat Lane and the

primary distributor to the large A448 junction could be expected to stimulate increased traffic in what is intended to be a quiet area with no rat running. Traffic calming measures and junction control would seem to be indicated.

3.15 The use of the large Birchfield Road junction with the A448 as access to the site is understandable. When the dual carriageway A448 was constructed it was designed and built to allow no other junctions between Foxlydiate and the Slideslow island at Bromsgrove since urban development was not envisaged in the predominantly rural area which it traversed. Partly as a consequence of this, the four points of access proposed which link the site to Redditch and the SRN are more concentrated than might otherwise have been expected and we would therefore expect the impact on roads within Webheath itself to be particularly pronounced.

3.16 Finally, we would add that, should development proceed at this site, we would expect very careful attention to be given to the siting of the service and parking areas and the access routes for heavy lorries. It will also be necessary to limit their movements to those routes able to accommodate them.

4. Conclusion

We have objected to the granting of Outline Planning Permission for this development and the foregoing comments indicate our reasons for objecting to the detailed Access application submitted alongside it.

In summary, we are of the opinion that the detailed application does not fully address the problems which we have identified. Whilst the link between the roundabout at Cur lane and the A448 at Birchfield Road may seem a straightforward undertaking it is not yet clear how the link is expected to function. The minor access point via Pumphouse Lane prompts doubts about its purpose and viability. Flaws in the work relating to access to the Strategic Road Network need additional consideration, as per the Highways Authority, and additionally we feel that Worcestershire County Council and the developers have not presented enough evidence to show that they have adequately considered the implications of access to and from the development for the whole road network surrounding the site. It is for these reasons that we object to the detailed Access application made by the developers.

Bentley Paucefoot Parish Council

3rd May 2016