



The Bromsgrove Society

Founded 1980

Reg Charity No. 510542

Re: Planning Applications registered with Bromsgrove District Council 16/0335 and 21/00096/OUT and Planning Appeals

APP/P1805/W/20/3265948 Land at Perryfields Road, Bromsgrove Worcestershire

And Planning Applications registered with Bromsgrove District Council

20/00300/FUL and 21/00162/FUL and Planning Appeals

APP/P1805/W/21/3268752 Alterations to the junction of Fox Lane and Rock Hill to form a roundabout junction. Demolition of the existing building (The former public house 'The Greyhound Inn')

Date: 11th March 2021

The Bromsgrove Society has considered the applications and appeals listed above, makes the comments below, and concludes that the applications and appeals should be **REFUSED on grounds of HIGHWAYS and HERITAGE.**

Comments on Highways

Perryfields Spine Road

The Society notes the proposal that Perryfields Road will be severed and replaced with a new spine road linking Kidderminster Road and Stourbridge Road and that this road will be designed to deter through traffic from travelling through the proposed Perryfields site.

The Society also notes that Paragraph 8.124 of the District Plan states *"in order to reduce congestion and improve air quality in the Town Centre, wherever possible, through traffic will be routed via alternative less congested routes"*.

Furthermore, Paragraph 8.162 of the District Plan states *"road congestion is an increasing problem for the Town Centre, particularly during peak hours and when traffic attempting to avoid motorway congestion diverts to the local road network"*.

Clearly the proposal to deter the through routing of traffic across the Perryfields site will have an impact on the road network external to the Perryfields site over and above that arising from the traffic generated by the development itself. The Transport Assessment fails to inform the local community of the additional impact arising from the proposal to deter through traffic from crossing the Perryfields site. However, local knowledge indicates that the additional impact will be greatest in the Sidemoor Area, All Saints Road & Victoria Road and in the Town Centre.

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

Furthermore, regarding the routing of through traffic between Kidderminster Road and Stourbridge Road, The Society welcomes that;

1. The Local Transport Plan identifies that a longer term transport strategy is currently being developed for the Bromsgrove District and that the case for a potential Western Bypass for Bromsgrove is one of the options that will be comprehensively assessed.

2. The outcomes of the strategic transport assessment that has been commissioned by the County and District Councils will feed into future versions of the Local Transport Plan and the Bromsgrove District Plan.

The Western Distributor Road feasibility study undertaken by the County Council in 2015 identified two route options linking Kidderminster Road and Stourbridge Road both of which cross the proposed Perryfields development site. These route options would no longer be viable if the Perryfields application with the submitted illustrative master plan was to be granted consent. However, it appears to The Society that this matter could be addressed if the Applicant came forward with an acceptable proposal for a spine road designed to have the characteristics and functionality of a distributor road.

Assessing the Impact of Development at Perryfields

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

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

Rat running

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

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

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

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

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

Impact of Development on Journey Times

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

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

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

Impact of Development at Individual Junctions

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

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

Bromsgrove Town Centre and the National Planning Policy Framework

As acknowledged in paragraph 8.162 of the District Plan, the Town Centre currently experiences congestion and delays. It appears to The Society that this arises from conflict between local traffic, vehicles routing east – west on the A448 which links the principal towns of North Worcestershire and vehicles routing north – south on the B4091.

The Society agree with the comments made in the Worcestershire County Council consultation response on highways matters dated 4th November 2020 that *“road congestion is an increasing problem for Bromsgrove Town Centre, particularly during peak hours”*.

However, The Society, for the reasons given below, does not agree with the County Council’s conclusion that *“the highway enhancements proposed by the Applicant manage the residual traffic impacts as far as is reasonably practical with due consideration to the built environment of a historic Market Town in accordance with NPPF”*.

There is no such *“manage the residual traffic impacts as far as is reasonably practical”* test within the National Planning Policy Framework (NPPF).

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

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

Taking each of the A448 Town Centre junctions in turn.

Impact of Development at the Parkside Junction

With regards to The A448 Market Street / B4091 Stourbridge Road / Birmingham Road / A448 The Strand (Parkside) Junction, The Society notes that;

1. The applicant demonstrates in their transport assessment that the junction will operate over capacity in 2030 without development at the proposed Perryfields site.
2. The applicant proposes a mitigation scheme that bans right turns from A448 Market Street into A448 The Strand and bans left turns from Birmingham Road into The Strand. The applicant claims that this scheme will deter drivers from approaching the junction from the east and the west and encourage drivers to travel on the underutilised A38 and B4184.
3. The Society notes that the applicant's mitigation proposals are not part of the Local Transport Plan, the applicant fails to present any evidence that the A38 and New Road are underutilised and banning traffic movements into The Strand from Market Street and Birmingham Road will not deter drivers approaching the junction from the east from using the junction.
4. The applicant demonstrates in their transport assessment that with the implementation of their mitigation proposals the performance of the junction will deteriorate further in Scenario 4 with the addition of Perryfields development vehicle trips.
5. The applicant fails to provide within the Transport Assessment a table showing the performance of the junction for the required Scenario 7.

On this basis it appears to The Society that the impact of development at Perryfields will have a severe impact on ease of movement, congestion and highway safety at the Parkside junction and this provides sufficient reason to refuse the planning application.

The Society understands that the County Council is developing an alternative improvement scheme for the Parkside junction and that funding has been secured for the scheme. However, no such scheme has been submitted for consideration and consequently Decision Makers have no evidence before them to demonstrate that the County Council scheme will mitigate the impact of development at the Parkside junction. Consequently, it appears to The Society that it has not been demonstrated that the impact of development at the Parkside junction will not be severe.

Impact of Development at the BirdBox Junction

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

The County Council have requested a Section 106 contribution towards an unspecified junction improvement scheme at the BirdBox with the cost of the scheme being identical to the traffic signalisation scheme shown in the Infrastructure Delivery Plan (IDP).

The Society are very concerned that the County Council have not required the applicant to demonstrate that the signalisation scheme in the IDP, or any other scheme for that matter, will mitigate the impact of development.

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

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

Impact of Development at the Waitrose Junction

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

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

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

Turning now to the impact of development at junctions away from the Town Centre.

Impact of Development at the Rock Hill / Fox Lane Junction

The Society are concerned by the totality of the departures from standard required to deliver the proposed junction improvement scheme in this constrained location which has challenging gradients and the overall safety of the junction.

Furthermore, The Society are very concerned that there is no all arm junction assessment provided for Scenario 7 in the main text of the transport assessment as this is the evidence required for determining that the impact of development at the Perryfields site can be cost effectively mitigate. Consequently, The Society is prevented by the omission of this information from making meaningful representations through the planning application consultation process on the impact of development at the Rock Hill / Fox Lane junction.

It appears to The Society that the loss of parking spaces in the Rock Hill layby is likely to have an impact on passing trade at the Rock Hill convenience store with the consequence that this valued local amenity may be lost.

Also the absence of a parking space at the front of the store capable of accommodating deliveries currently made using lorries of 18 tonne gross vehicle weight is likely to have an adverse impact on road safety as delivery drivers will be forced to park elsewhere on the highway in close proximity to the shop.

Impact of Development at the Catshill War Memorial Junction

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

Conclusions on Highways

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

Consequently, The Bromsgrove Society considers that Planning Applications 16/0335 and 21/00096/OUT and Planning Appeal APP/P1805/W/20/3265948 regarding land at Perryfields for

- up to 1,300 dwellings;
- up to 200 unit extra care facility;
- up to 5HA employment;
- mixed use local centre with retail and community facilities;
- First School;
- open space, recreational areas and sports pitches; associated services and infrastructure (including sustainable drainage, acoustic barrier);

with matters of appearance, landscaping, layout and scale (including internal roads) being indicative and reserved for future consideration, except for details of the means of access to the site from both Kidderminster Road and Stourbridge Road, with associated highway works (including altered junctions at Perryfields Road / Kidderminster Road and Perryfields Road / Stourbridge Road). **SHOULD BE REFUSED**

and Planning Applications 20/00300/FUL and 21/00162/FUL and Planning Appeal APP/P1805/W/21/3268752 for

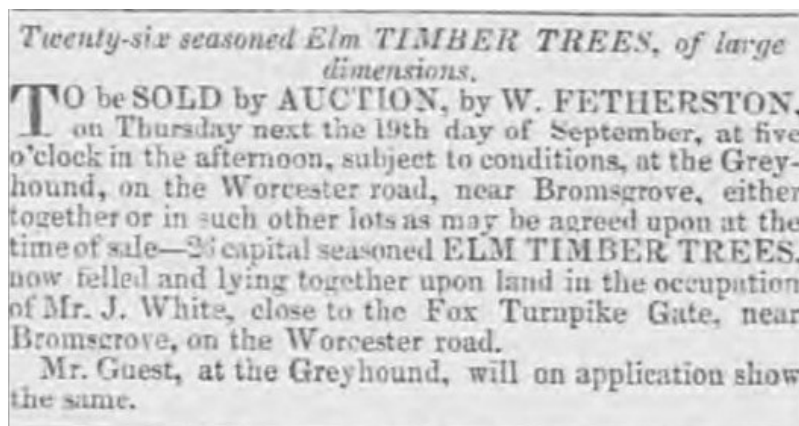
- Alterations to the junction of Fox Lane and Rock Hill to form a roundabout junction;
- Demolition of the existing building (The former public house 'The Greyhound Inn'), 30 Rock Hill Bromsgrove, Worcestershire, B61 7LR.

SHOULD BE REFUSED

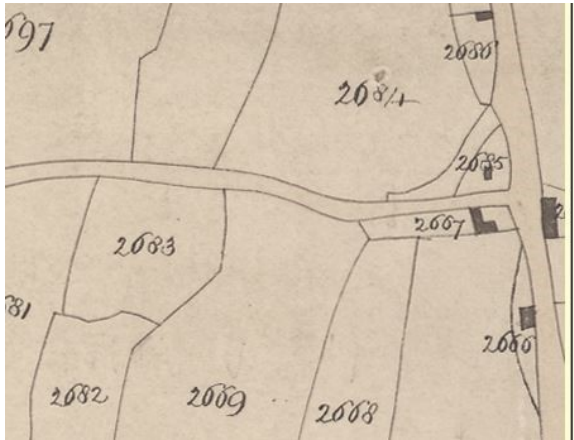
Comments on Heritage

Historical Aspect of the Greyhound Inn site

The Society notes the comprehensive summary of the development and usage of the building provided by Bromsgrove District Council's Conservation Officer Mary Worsfold in her consultation response to application 16/1132/FUL and 20/00300/FUL.



The Society believes the building to date from the century before the known documented evidence. Aris's Birmingham Gazette confirms that it was known as The Greyhound by 16th September 1839.



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

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

Local Heritage Asset

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

"In terms of the Local Heritage List the building would clearly be a candidate and would satisfy the selection Criteria as follows;

Criteria 1 - Age, Authenticity and Rarity

Dates from at least the early part of the 19th century, and the original form of the building, and its subsequent development is clearly discernible. It is an example of a vernacular dwelling which has evolved through the 19th century into a public house.

Criteria 3 - Historic Interest

As asset which dates from a time when Rock Hill was not an extension of Bromsgrove, but a sparsely populated area of wayside development. Mention has been made that it was a quarrymen's pub, and there was extensive quarrying in the area, so if that was the case it is the only link to the industrial past of the area.

Criteria 4 - Townscape/ villagescape / landscape interest

A landmark building which due to its age and raised position, on the corner of Rock Hill and Fox Lane, makes a positive contribution to the surrounding area. It is a notable feature in the historical development of the area. It dates back to a time when this area was separate to Bromsgrove."

The Society supports the Conservation Officer's assessment of the merits of adding The Greyhound Inn to the Council's Local Heritage List.

The Society is aware that the Council does not yet have a list of Local Heritage Assets owing to staff and resource limitations. Therefore, the Greyhound Inn does not yet feature as the list does not exist, and not that other assets have made the list but the Greyhound Inn awaits listing.

The Society also notes that the minutes of the Planning Committee of 6th November 2017 record for **refused application** 2017/00950/FUL (The Greyhound Inn be demolished);

"Whilst the building was not currently listed as a local heritage asset, Members considered that there was the potential for the building to become [a local heritage asset] and be of benefit to the people of Bromsgrove."

The Society is hopeful that the Heritage Asset List can be created before it is too late for important heritage assets in the area.

With regards to planning application 20/00300/FUL the Council's Conservation Officer concluded;

"The loss of this heritage asset is not supported, and it would [be] preferable to see the current scheme amended to retain this building..."

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

If the appeal were to be approved;

1. It is the expectation of The Society that full historical and environmental investigation and recording of The Greyhound Inn site be conditioned; and;
2. The Society consider a condition that the building stone used in the Greyhound Inn and surrounding retaining walls be recovered for reuse in retaining walls or other landscaping features at the Greyhound Inn and / or Whitford Road sites would be appropriate.

Bromsgrove Sandstone

During 2018 the clearance of vegetation adjacent to the car park in Fox Lane revealed that the highway here cuts through Bromsgrove Sandstone. Regrettably the landowner has allowed the vegetation to become overgrown again and the sandstone exposure is now largely obscured. Through the work spanning eight decades of the 20th Century of Professor L J Wills of the University of Birmingham the Rock Hill Area has played an important role in geological research with a number of fossils named after the Town. The Society notes with concern that the concept drawing for the proposed roundabout at the Rock Hill / Fox Lane junction appears to require the removal of part of the existing sandstone exposure but the Herefordshire and Worcestershire Earth Heritage Trust have not been consulted specifically on this matter.

Conclusions on Heritage

Based on the points raised regarding the historical significance of the Greyhound Inn and its associated local sandstone the Bromsgrove Society considers that Planning Applications 20/00300/FUL and 21/00162/FUL and the Planning Appeal APP/P1805/W/21/3268752 Alterations to the junction of Fox Lane and Rock Hill to form a roundabout junction. Demolition of the existing building (The former public house 'The Greyhound Inn')

SHOULD BE REFUSED

and that the Planning Applications 16/0335 and 21/00096/OUT and the Planning Appeal APP/P1805/W/20/3265948 Land at Perryfields Road, Bromsgrove, Worcestershire

SHOULD BE REFUSED

The Bromsgrove Society

Pride : Preservation : Progress

President: Mrs Isobel Jarrett - Chairman: Miss Pat Tansell - Vice Chairman: Miss Jo Slade

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