

Emma Worley
Wychavon District Council
Civic Centre
Queen Elizabeth Drive
Persore
Worcestershire
WR10 1PT

County Hall
Spetchley Road
Worcester
WR5 2NP

Date: 07/03/2022
Your ref: W/22/00201/OUT
Ask for: Howard Davies

Dear Emma,

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

PROPOSAL: Outline planning application for the erection of up to 102 dwellings, new vehicular and pedestrian access, and associated works. All matters reserved except for access.

LOCATION: Land At (Os 8894 6544), Kidderminster Road, Hampton Lovett

APPLICANT: Beechcroft Land Ltd & Henry Bouskell

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

The justification for this decision is as follows.

The Highway Authority is in receipt of a Transport Assessment and accompanying Travel Plan which have been prepared by the applicant's consultant BWB Transport & Infrastructure Planning. The Applicant seeks Outline planning permission for the erection of 102 residential dwellings with all matters reserved, except for access. The application site is located to the north of Droitwich Spa, immediately to the south of the village of Hampton Lovett.

Illustrative masterplan (drawing reference K729-30E) shows a proposed residential development of 102 dwellings, providing a range of homes of 1-5 bedrooms in detached, semi-detached and terraced configurations to meet the demands of the local housing market. The mix indicated on the submitted masterplan is illustrative only, with the exact mix to be determined at the Reserved Matters stage. Affordable housing will

be provided according to the requirements of SWDP 15 and in a mix to suit local housing need.

A significant proportion of the site is envisaged to be given over to green space, much of which will be public open space for the amenity of residents and the wider community, as well as improving biodiversity and the quality of the natural environment.

Planning Context

Outline planning application (17/01631/OUT) was submitted in August 2017 for the development of up to 144 new residential dwellings on the same site. That application was supported by Transport Assessment (TA) (Ref: HAM-BWB-GEN-XX-RP-TR-0001) which assessed the impact of up to 200 dwellings. The application was refused by the Local Planning Authority in June 2018. There were various grounds for refusal, though none related directly to highway or transport matters. The decision was appealed by the applicant and the Planning Inspector dismissed the appeal on 28 January 2020.

The current application proposes is seeking approval for development of up to 102 residential dwellings. The submitted TA examines current transport conditions in the vicinity of the site and the potential impacts of up to 110 residential dwellings.

Access Proposals

A single point of vehicular access is proposed at a new priority T-junction off the A442 Kidderminster Road, 60m to the south of Doverdale Lane. This is the same as proposed in the 2018 application.

In accordance with the Worcestershire Streetscape Design Guide (SDG) the access has been designed as an 'informal street' comprising a 5.5m wide access road and 2.0m wide footways on both sides of the carriageway. The footways will connect to the existing footway on the eastern side of Kidderminster Road. Junction radii of 10m will be provided at the site access to facilitate access for larger vehicles.

Kidderminster Road will be widened to provide a ghost island right turn lane at the access. The access design is shown in TA Appendix 2, drawing reference HAM-BWB-GEN-XX-DR-TR-101 S2 P6.

While there is no objection to the principle of such an access arrangement, the Applicant must demonstrate that it does indeed comply fully with the WCC (SDG) and DfT Manual for Streets (MfS) standards. Therefore, the Highway Authority would request that the Applicant provide clarification of:

- Dimensions of the visibility splays proposed. This should include survey data to show that they are based on recorded 85th percentile speeds of traffic on

A442 Kidderminster Road in accordance with the guidance set out in Manual for Streets 2 (MfS2).

- The junction radii should be confirmed. There appears to be contradiction within the TA and drawing GEN-XX-DR-TR-101 S2 P6 with both 8m and 10m radii mentions.
- The Applicant should provide an independent GG 119 Road Safety Audit (RSA) Stages 1 and 2 for the proposed vehicular access from Kidderminster Road.
- The Applicant should include a pedestrian crossing facility over Kidderminster Road, to allow users to access the bus stop on the opposite side of the carriageway. Further consideration could also be made to include a pedestrian refuge if the carriageway width allows.

Vehicle Tracking

The proposed site access has been tested using several different types of vehicles. Following review, the Highway Authority are concerned that a 10.6m refuse vehicle making the left turn out of the development will into the inbound ghost island right turn lane. Not only so, but it is further assumed that vehicles waiting to turn right into the site will position themselves to the extreme left-hand side of the right turn lane rather than centrally in that lane. This driver behaviour should neither be assumed or expected and would not be acceptable mitigation.

Given the classification of Kidderminster Road and its associated vehicle flows and speeds, it is the opinion of the Highway Authority that additional widening within the site access should be investigated, to allowing vehicles to pass each other without encroaching into opposing lanes creating risks to other road users.

In addition to the above, the Highway Authority also requests that additional swept path assessments are undertaken using the standard Phoenix 2 Duo Recycler (11.2m) template. This will ensure that the largest refuse vehicle used in the area can safely navigate both to and within the site and not just at the site access.

Visibility Splays

The Applicant has highlighted with the TA (p17) that the *“required visibility splay at the proposed site access junction has been determined by a speed survey which yielded 85th percentile vehicle speeds on Kidderminster Road 50 mph northbound and 51 mph southbound”*.

In accordance with Table 7/1 of Design Manual for Roads and Bridges a 160m visibility splay from a setback distance of 2.4 metres must be unobstructed and accord with the recorded prevailing road speeds. The details show on drawing GEN-XX-DR-TR-101 S2 P6 show this. However, Highway Authority wishes to see the speed survey data to

confirm that the 85th percentile speeds and visibility splay dimensions have been calculated in full accord with the relevant standards.

Layout

It is unclear whether the internal road layout shown on illustrative masterplan (K729-30E) has been designed to that of the standards as set out in the WCC (SDG).

While we acknowledge that these have been provided as an indicative layout, with its main focus being that of junction and external highway access arrangements, without geometric information it is not possible to accurately comment on the proposed layout. Therefore, the Highway Authority will expect the applicant to note the following information which should be provided in support of a future Reserved Matters application.

- Clarification of design speed for the access road and all internal roads.
- Full details of all internal road dimensions which should be clearly shown on drawings and comply with the SDG.
- All turning heads must comply with the SDG.
- Crossing facilities, with tactile paving, should be provided to ensure a safe route for pedestrians within the site. Special consideration should be made to the inclusion of dropped kerbs with tactile paving on the desire line in the bell mouth of the proposed junction with Kidderminster Road for pedestrian connectivity.
- Swept path analysis for vehicles should be provided within the site, including all turning head areas. As a minimum, a Phoenix 2 Duo Recycler (11.2m) template should be used for all tracking. This will ensure that refuse vehicles can safely navigate throughout the site.
- It is unclear whether cyclists have been considered within the layout. Further information is requested to ensure cycle movements have been considered and appropriate infrastructure is to be provided.
- A refuse and recycling collection management plan should be provided, complying with maximum walking distances for refuse collection operatives.
- Forward visibility splays and junction visibility of 25m should be confirmed throughout the internal road network and shown on plans.
- Pedestrian footpaths should be provided on both sides of the estate of the road.

- Electric vehicle charging facilities must be provided in accordance with the Streetscape Design Guide. In addition, car parking bay dimensions must also be illustrated in order to confirm they are acceptable;
- The Applicant must confirm the number and location of car and cycle parking spaces that will be located within the development site. Residential garages are excluded from any parking calculations.
- Street lighting details should be provided, conforming with the WCC Street Light Design Guide.
- A 3.0m wide surfaced path from the proposed development should be provided to connect with Bridleway 537 (B) (The Forest).
- Fencing should be provided to prevent pedestrian ingress into the proposed attenuation pond.

Highway Safety

The Highway Authority request that the most recent five-year Personal Injury Collision (PIC) data is obtained from WCC, for the entirety of the study area. It should be noted that WCC do not consider crash-map (www.crash-map.co.uk) to be a suitable data source for accident data.

Trip Generation

The Trip Rate Information Computer System (TRICS) database (V7.6.1) has been used to generate vehicle trip rates for the Land Use Category 03 Residential, A – Houses Privately Owned for an AM peak (08:00 – 09:00) and PM peak (17:00-19:00). WCC is content with the site selection and consider it appropriate and comparable for the scale and location of the proposed development.

Table 5.1 of the Applicants TA shows the trip rate used where Table 5.3 presents the forecast multi modal trip generation associated for a development of 110 residential units. This is robust as the application is for a maximum of 102 dwellings. These have been replicated below within Table 1.1 for reference.

Table 1.1 Forecast Trip Generation (110 Residential Units)

Mode	Weekday AM Peak (08:00-09:00)		Weekday PM Peak (17:00-18:00)	
	Arrive	Depart	Arrive	Depart
Vehicles (car/van)	23	48	47	24
Pedestrians	1	3	3	2
Public Transport	1	2	2	1
Bicycles	0	1	1	0
Others	0	1	1	0
Total	25	55	54	27

Table 1.1 predicts that the development will generate a total of 71 (two-way) vehicular trips in the AM peak and 70 (two-way) in the PM peak. These increases are not considered to be significant relative to tests of paragraph 111 of the National Planning Policy Framework (NPPF). Consequently, the Highway Authority accepts the results presented and no further trip generation assessment is required.

Trip Distribution

The methodology/information used to determine proposed vehicle trip distribution across the local highway network is noted. The Applicant identifies that Ordnance National Survey (ONS) 2011 Census data for the Middle layer Super Output Areas (MSOA) of Wychavon 001 was used to calculate vehicle distribution. The Highway Authority is satisfied with this approach and therefore no further information or clarification is required.

Traffic Modelling

The Highway Authority has reviewed the capacity assessments of the following junctions:

- A442 Kidderminster Road/Site Access
- A442 Kidderminster Road/Pointon Way Roundabout
- A442 Kidderminster Road/A38 Roundabout

These were assessed using the industry standard software, Junctions 9.0 to predict the operational impact of a development of 200 dwellings.

There are no concerns of potential queuing arising from a development of that size, either at Pointon Roundabout or the site access. However, Kidderminster Road North and A38 East are forecast to operate nominally over capacity during the PM peak in both with and without the proposed development. These increases are very modest and within the daily fluctuations of background traffic and, given these were from a potential development of 200 dwellings, it is to be expected that a development of 110 dwellings would have a lesser negligible effect at these locations.

The Highway Authority agrees that any increase is unlikely to have a significant effect on the operation of the junction and hence no further assessment is required.

Drainage Strategy

The Local Authority requests that the applicant provide a Drainage Strategy report. This is due so that the planning authority can investigate if the applicant is providing the most appropriate drainage solutions for this type of development.

Unless the highway drainage infrastructure, proposed for the new highways within the development is connected directly to a STW asset, such as a sewer or an existing

highway drainage system the road will not meet the criteria for adoption as a highway maintainable at public expense.

Where new highway drainage connects into an existing highway drainage system, an assessment of that system will be required, in terms of capacity and condition. Where necessary, the developer will be expected to address issues arising lack of capacity and any defects at their own expense.

Public Rights of Way

The Highway Authority notes that the applicant has taken the bridleway and wider rights of way network into consideration when preparing the residential masterplan. The Highway Authority is content with the information provided and no further material is required.

Bus Provision & Infrastructure

As referenced within the TA *“the Site is situated within reasonable walking distance of existing bus stops which provide frequent connections to Droitwich and beyond. There are several local amenities and facilities within walking distance of the Site meaning that future residents have a real choice of how they travel”*.

The main bus service in the area is Service 20 which operates, two morning peak services and two evening peak services as a circular extension to the core route that forms a loop around the adjacent Industrial Estate. This returns to Droitwich passing the site, railway station and retail outlets.

The Applicant should be aware that there is insufficient running time in the existing schedule to extend more trips to the location and amending the contract would result in additional cost and / or loss of service elsewhere. Additionally, Service 20 serves (Kidderminster –Chaddersley Corbett – Droitwich) and runs in both directions on Mondays, Wednesdays, Fridays, and Saturdays, providing 3 trips in each direction per day. This service is subsidised and at risk due to high operating cost combined with low patronage.

Service 20 is provided under contract LWY023 receiving a subsidy of £149,600 in 2016/17. Service 133 is provided under Contract LWY024 and received a subsidy of £98,000 in 2016-17. There is no scope within the Public Transport budgets to increase subsidies to augment either service. From further investigation, the most ideal solution for this location would be to increase the number of trips serving the site. This could possibly be achieved by extending Service 20 to provide an hourly service. However, this will require a review of all Droitwich Services to re-work the bus schedules and a retendering exercise. In order to provide the additional trips without loss of service elsewhere this would require the Highway Authority to contract an additional bus.

It has therefore been estimated that, based upon 8 additional trips per day, Monday to Saturday, providing this additional service would cost £120,000 per annum less

farebox revenue. Based on a breakeven period of 6 years, a contribution of £360,000 would be required to provide this service.

The Council also has specific duties under the Transport Act 1985 to take account of the transport needs of elderly and disabled residents. It is foreseeable that the majority of residents within these categories will form the demographic of the proposed development, therefore this matter has increased importance. If residents are unable to access the bus stops safely, then in affect they will be denied access to public transport.

There is a case for Community Transport to provide services for Disabled and Elderly residents who are unable to access bus services in order to discharge the Council's obligations under the 1985 Transport Act and 2010 Equalities Act.

The Highway Authority analyses this using historic trip need, DfT mileage rates and census data based on five years calculated cost. The service provides access to vital services, particularly acute health where it is no longer policy to offer appointments at the nearest facility to the resident's home address. On this basis the contribution requested is £4,536.

All local schools servicing this development are within the statutory walking distance so no contribution will be requested for school transport.

The Highway Authority's main concerns involve the lack of facilities for pedestrians to cross Kidderminster Road to access these bus stops. Currently, there are a pair of bus stops that serve the adjacent Caravan Park (circa 200 metres from the proposed development). The outbound bus stop consists of just a pole and flag with hardstanding, is only used by Bus Service 133, and is deemed unsuitable due to the absence of a safe pedestrian crossing point along a fast stretch of road. The inbound stop does however provide a shelter and is located on a pedestrian footpath that extends past the frontage of the proposed development.

The applicant is required to comply with accessibility best practice as WCC now advertise the accessibility of all bus stops on their routes. Hence, the Highway Authority would like some form of Accessible Audit to be undertaken, equivalent to the TfL programme PERS (Pedestrian Environment Review System). The purpose of this should be to identify if all surrounding bus stops are indeed accessible and provided facilities such as dropped kerbs and visual tactile paving.

Therefore, further information is requested in order to ascertain the suitability of the existing route from the proposed development, and to assess whether any mitigation and/or additional facilities should be considered to ensure safe access for pedestrians.

Pedestrian & Cycle Infrastructure

Located on the western side of Kidderminster Road there is currently a cycle route (National Cycle Route 45) as well as the above-mentioned Bus Service 133 (Stop ID: wocgtagm) is located.

As mentioned previously WCC would like to see the Applicant provide a pedestrian and cycling crossing facility over Kidderminster Road, thus delivering connective infrastructure, as per Cycle Infrastructure Design Guidance (LTN1/20) from the proposed development to that of the existing area.

The Highway Authority would also request that the Applicant provide a contribution for the provision of a new footway to Westlands First School on Farmers Way (£32,000, inflation linked) and a contribution for the provision of a signalised pedestrian crossing on Roman Way. Additionally, the Highway Authority is seeking contributions of (£380,000, inflation linked) for the provision of two pedestrian signalised crossings to improve connectivity for non-motorised users to access local services.

Lighting Infrastructure

The Highway Authority requests that the developer employ a suitably qualified lighting Engineer to carry out a lighting assessment in line with the current WCC Street Lighting Design Guide (SLDG).

This should be carried out against a dark baseline (i.e., adopted highway lighting should only be proposed if there is clear requirement to include it). Some of the aspects to consider when assessing the lighting requirements include; compliance with the DMRB (e.g., visibility), the Streetscape Design Guide (presence of shared surfaces / full height kerbs), ecological impact, crime rate, local precedence, schools / community facilities, or any other factor mentioned within the SLDG.

The assessment must not only cover the development itself but also the proposed junction with the A442, plus any other highway improvements associated with the scheme. In particular, the report should discuss compliance with the DMRB to clarify whether there are any departures which may affect road safety. As part of the overall lighting assessment, the Highway Authority will also require an Ecological Impact Assessment to be carried out by a qualified professional should there be any public or private lighting proposals.

If any public or private lighting is proposed as part of the scheme the developer must liaise with WCC's ecologist and the parish council, regarding their proposals. Any subsequent lighting design for adoption by WCC shall be in accordance with the requirements of the SLDG.

Travel Plan

The Highway Authority acknowledges the Applicants Residential Travel Plan. However, WCC has published guidance on how it expects Travel Plans to be prepared. This guidance is freely available from the County Council's Travel Plans Officer.

As part of this process, the applicant must register for Modeshift STARS (www.modeshiftstars.org) and ensure that their targets have been uploaded, so that progress on the implementation of the Travel Plan can be monitored. WCC can assist applicants with this process should they need. Modeshift STARS is a nationally accredited scheme which assists in the effective delivery of Travel Plans.

In addition to the above, the applicant should also produce a Travel Welcome Pack (TWP). The TWP must be prepared in accordance with the attached below guidelines document.

https://www.worcestershire.gov.uk/downloads/file/11365/guideline_for_travel_welcome_packs

These guidelines have been developed by WCC to assist developers in producing Welcome Packs to support small residential developments. Once this TWP document is received and the submitted methods of sustainable travel agreed with the Highway Authority, the applicant must then confirm that they will submit a copy of the TWP to each dwelling on or before first occupation.

Finally, the highway authority would also require the applicant to provide Personalised Travel Planning (PTP) as one of its key measures within the Travel Plan. As stated within Worcestershire County Council's guidance for Residential Travel Plans, "*All residential sites with more than 50 dwellings must provide a comprehensive (PTP) to residents. This is an essential mechanism to achieve modal shift for residential developments of this scale*".

This service must provide residents with plans on how they can make their regular journeys by sustainable modes i.e., walking, cycling, public transport or car share. It can be provided in response to requests but must be very well marketed to encourage residents to utilise this service. PTP should be carried out face to face unless the resident requests that it is delivered via a zoom/skype or telephone call.

This service can be provided to the applicant and further discussions are required with the Travel Plan Officer at WCC.

Construction Management Plan

The Highway Authority require the Applicant to provide the relevant details in respect of the construction stage of the proposed development. A Construction Environmental Management Plan (CEMP) setting out the proposed hours of operation, routing, access proposals and site details will form a condition as part of any successful planning consent.

Conclusion

The Highway Authority has undertaken a robust assessment of the planning application and the submitted documents made available. Currently, there are a

number of outstanding issues that have been identified in relation to the current layout, pedestrian/cycle safety as well as clarification regarding potential crossing facilities, that require further clarification from the applicant. The Highway Authority therefore submits a response of **deferral** until further information is provided.

Howard Davies

Development Control Engineer

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