



Romsley Parish Council
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30th November 2018

To: *Bromsgrove Planning Department*
Cc: *Ruth Bamford – Bromsgrove Planning*
Cc: *G N Denaro – Leader of Bromsgrove Council*
Cc: *Karen May – County Councillor, Clent Hills Division*
Cc: *Margaret Sherry – District Councillor, Belbroughton and Romsley Ward*
Cc: *Chris Allen-Jones – District Councillor, Belbroughton and Romsley Ward*

Planning application 18/00282/FUL (Amended) – Seven dwellings, Yew Tree Farm, Romsley

Introduction:

1. This is the **Romsley Parish Council** response to the **amended** planning application **18/00282/FUL** which proposes the building of seven dwellings on land associated with Yew Tree Farm beside St Kenelms Road, Romsley. Its contents replaces any previously submitted correspondence on this matter.
2. Romsley Parish Council **objects** to the development in its current form because of community concerns over serious traffic safety issues at the development location and the long-term impact this will have on the commercial sustainability of the Co-op community store and post office.
3. The Parish Council has grave concerns over the robustness of the road safety assessments that Worcestershire CC Highways dept has claimed to have undertaken on this development. We believe the assessments lacked sufficient depth and failed to identify the frequency or severity of safety issues that are present at the development location.
4. In response, the Parish Council has submitted a Freedom of Information (FOI) request to obtain the detail of these assessments and has also commissioned an independent Road Safety Review of the location through a leading firm of road engineers.
5. In addition, The Parish Council working with the local community monitored the location over a 12-day period in early November 2018. During this period, we captured more than **80** safety incidents which equate to more than **2000** safety incidents annually. We have prepared a short video montage that contains a sample of this evidence which can be viewed at this link.

<https://youtu.be/CuRctbQ8nmU>

6. We believe this video clearly demonstrates the high number of severe problems that exist at the development location and that will be made significantly worse by the development in its current form.
7. After viewing this video evidence, we would ask the members of the planning committee to consider whether they believe that the road safety assessment and the subsequent recommendation, submitted by Worcestershire CC Highways Dept. is sufficiently robust and fit for purpose to authorise this development. Or, whether the decision should be deferred pending the results of a comprehensive road safety review, traffic statement and the additional supporting documentation.

Background:

8. Romsley Parish Council fully recognises the obligations it carries as a branch of Local Government to support the ambitious house building targets set by central Government. We will work constructively with all partners to deliver appropriate and sustainable housing developments that meet the needs of the community of Romsley. As such the Parish Council is not opposed to using this location for appropriate housing if a sustainable and long-term solution to the safety and traffic problems can be found.
9. The development will be positioned on St Kenelm's road opposite the Co-op shop and community Post Office at a location where the road geometry and layout are highly problematic. The road can be very busy and carries a mixed load of private cars, buses, towed caravans and commercial vehicles accessing local farms. The road is relatively narrow with one lane being continuously taken up with marked parking bays supported by an existing Traffic Regulation Order. This effectively reduces the carriageway to a single lane for 40 plus metres directly outside the development. The road also has a significant sweeping bend which, in combination with parked cars, hampers vehicle visibility. Cars frequently commit to the single lane from both directions meet each other and have nowhere to go unless they mount and drive along the pavement in front of the development site. Conflicts between vehicles and pedestrians, cycles and other vehicles are frequent.
10. Everyone in our community knows that this is a dangerous and congested section of road. In our recent resident's survey, the problems at this location were identified as one of the most critical transport related concerns facing our community. As a result, the Parish Council has been lobbying Worcestershire CC Highways Dept. for several years, to make improvements. However, this has been resisted because of affordability and feasibility.
11. To date, this development has sparked massive interest amongst residents, with dozens of public comments being submitted, the vast majority of which identify concerns over the traffic safety and congestion issues at the development location. Following the release of the 4th iteration of the proposals in October 2018, there is now significant hostility amongst all residents who feel let down by Worcestershire CC Highways Dept. who have failed to undertake a proper assessment of the road safety issues that affect the location.
12. On Monday 26th November more than 75 residents met to express frustration about how this development can go ahead without addressing the obvious safety and congestion problems. There was also real anger that it will be their friends, family and the wider community who will ultimately have to pay the long-term cost of this development through increased risk of injury, greater congestion and reduced accessibility to the community shops and post office.
13. Romsley Parish Council is saddened that we now have to object to these proposals, which is a change to our position of July 2018. However, we have little choice given the amendments that were submitted in October 2018 which are a step backwards on road safety and sustainability compared to plans submitted by the developer in July 2018.
14. The plans of July 2018 proposed 700mm of road widening and the construction of a 1 metre partial layby outside the Co-op shop and Post Office as part of the development under a developer contribution and section 278 agreement. Initially Worcestershire CC Highways Dept. appeared supportive of these proposals. However, these proposals were withdrawn for reasons that have not been adequately explained to the Parish Council.
15. Whilst we acknowledge that the new proposals do contain a Unilateral Undertaking of £35,000 the plans do not contain any specific details or timescales as to how this will be used resolve the cumulative traffic safety issues in a sustainable way or whether this is of sufficient value to resolve the safety problems. These concerns are explored further in a later part of this document.

Robustness of road safety assessments;

16. It is the professional opinion of the author*, the Parish Council and the wider community that given the complexity and severity of traffic issues at this location a comprehensive Road Safety Review must be completed and supported with a Traffic Statement for the location and an appropriate safety audit of the development. This is vital to ensure that the traffic safety issues are properly understood, and the **residual cumulative impact** on the highway is resolved in an effective, and sustainable way.
17. To date there has been an unwillingness by Worcestershire CC Highways Dept. to be fully transparent about the type, depth and timing of the assessments they have completed.
18. The Parish Council has submitted a Freedom of Information request (FOI) to clarify these matters.
19. The Parish Council have requested Worcestershire CC Highways Dept to undertake more detailed assessments on several occasions. However, they have been unwilling to do this stating the development is below the size thresholds identified in their Policy.
20. This is incorrect, as their own Policy, **The Streetscape Design Guide**. (Section 2.4 page 11 to 13) states “**thresholds are not absolute**”, and it is “**important to combine the appropriate quantitative and qualitative thresholds in deciding the level of assessment**”.
21. The document then goes on to identify these qualitative thresholds, two of which are clearly relevant to this application as demonstrated by our own video evidence. “**Any development that is likely to increase accidents or conflicts among motorised users and non-motorised users, particularly vulnerable road users such as children, disabled and elderly people**” or “**Any development proposed in a location where the local transport infrastructure is inadequate. – for example, sub-standard roads, poor pedestrian / cyclist facilities and inadequate public transport provisions.**”

* The author is a Technical Director for Highway Asset Management with a leading Civil Engineering Consultancy and has over 15 years' experience in this profession.

The Unilateral Undertaking;

22. The Parish Council acknowledges that within the latest proposals a Unilateral Undertaking of £35,000 has been agreed between the developer and Worcestershire CC Highways Dept.
23. However, it must also be recognised that the current application contains no formal details about the type of improvements or the delivery timetable that the unilateral undertaking is meant to fund. Without this detail, it is impossible for the Community to be assured or the planning authority to determine accurately whether the development will be safe, sustainable and whether the residual cumulative impacts on the highway will be resolved.
24. The Parish Council believes it is vital for Worcestershire CC Highways Dept. to be completely transparent about the purpose and delivery timetable for the unilateral undertaking and declare this in the Public Record before the development proceeds.
25. We are particularly concerned that informal conversations we have held with senior members of Worcestershire CC Highways Dept. have indicated that the Unilateral Undertaking would be used for double yellow line road markings. This would remove all street parking near the development, including the section outside the Co-op shop and post office.

26. This would be disastrous for our community, as several homes at the location have no drives and are reliant on on-road parking. It would also seriously affect the commercial viability and sustainability of our vital Co-op community shop and post office as well as our other independent shops.
27. As a small rural village, Romsley is fortunate to retain a vibrant shopping area which provides many key commercial services to our 1,400 residents as well as supporting a community through donations with the Co-op providing over £15,000 to our community's good causes in the past year.
28. It is shocking to our residents that they would be faced with breaking the law to buy a pint of milk because there is no other public parking available in the area.
29. We must also recognise that Romsley has a large elderly community who would face a disproportionate impact, both because our bus services are so poor and also because of the severe winter weather we face due to our altitude. For these reasons they frequently need to use their cars to access the shops safely.
30. If double yellow lines are indeed an outcome of this development, this would clearly breach key elements of the **National Planning Policy Framework (July 2018)**.
31. One of the core objectives of **Sustainable Development, as identified in Section 2**, is the **social objective – “to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.”**
32. It would also clearly breach **Section 6, Building a Strong, Competitive Economy** particularly **paragraph 83 section c** which states that planning policies and decisions should enable ... **“the retention and development of accessible local services and community facilities, such as local shops etc.....”**
33. As well as **Section 8 , Promoting Health and Safe Communities, paragraphs 92a “plan positively for the provision and use of shared spaces, (such as local shops....) and other local services to enhance the sustainability of communities and residential environments.” 92c “Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day to day needs” and 92d “ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.”**

Progressing this proposal:

34. Before this development can proceed, we would ask the planning committee to defer any decision pending examination of;
- A comprehensive road safety review with an appropriately detailed traffic statement from Worcestershire CC Highways Dept.
 - The contents of the Freedom of Information Request (FOI).
 - The Parish Council commissioned Independent Road Safety Assessment.
 - Full clarity from Worcestershire CC Highways Dept. on the improvements intended under the Unilateral Undertaking with a clear timetable for any delivery.
 - A full sustainability assessment and an appropriate engineering report which demonstrates how the residual cumulative safety impacts are mitigated and the sustainability of our local shops and wider community are protected.
 - A comprehensive Level 1 & 2 safety audit of the proposed road improvements by the developer with appropriate commentary and sign off by Worcestershire CC Highways Dept.
35. Only with this information can the Bromsgrove Planning Committee be fully informed about the impact and sustainability of this development on the residents of Romsley. It will also ensure that Bromsgrove District Council mitigates any future criticism regarding traffic-related problems, injuries or fatalities occurring at this location in the future.

Richard Arrowsmith,
Romsley Parish Council Chairperson
on behalf of Romsley Parish Council