



Romsley Parish Council
167 Bromsgrove Road
Worcestershire, B62 0JU

romsleyparish@btinternet.com

20th June 2019

To: Bromsgrove Planning Department
Cc: Ruth Bamford – Bromsgrove Planning
Cc: John Hobbs – Worcestershire CC Highways Dept
Cc: Karen May – Leader of Bromsgrove Council; District Councillor Belbroughton and Romsley Ward; County Councillor, Clent Hills Division
Cc: Margaret Sherry – District Councillor, Belbroughton and Romsley Ward

Planning application 19/00305/FUL – Eight dwellings, Yew Tree Farm, Romsley

1. This is the **Romsley Parish Council** response to the **amended** planning application **19/00305/FUL** which proposes the building of eight dwellings on land associated with Yew Tree Farm beside St Kenelms Road, Romsley. This response contains 5 pages of written evidence as well as 20 pages of photographs, all of which we request to be submitted in full to the Bromsgrove Planning Committee as evidence.
2. 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. As such, the Parish Council is not opposed to building houses at this location as long as they are safe, sustainable, meet the needs of our community and adhere to the principles set out in the National Planning Policy Framework.
3. Whilst we recognise this new application makes changes to the highway arrangements contained within the original application 18/00282/FUL. Romsley Parish Council still has no choice but to **object** to this application because the serious pedestrian and highway safety issues that resulted in the original application being rejected by the Bromsgrove planning committee have still not been resolved adequately. These matters are explored in more detail in paragraphs 6 through 20 of this document.
4. In addition, we continue to hold deep reservations over the impact of this development on the future commercial sustainability of our vital community shop and post office. If, as expected, the development further increases the volume of pedestrian / vehicle conflicts, the Highway Authority may be compelled in the near future to remove the existing parking bays in front of the Co-op community store and install double yellow lines across the area. This would have a devastating impact on the commercial viability of the shops as well as creating massive inconvenience for our wider community, with a particularly adverse effect on those residents who live close by and must park on the road as they do not have driveways.
5. Finally, we believe that the developments proposed mix of houses still fails to provide any of the affordable housing that our communities young people desperately need.
6. In specific regard to the highway and pedestrian safety issues; The new residents who move into the development will be exposed to a severe hazard from vehicles driving along the footway when they leave their homes by foot to access village services.
7. The problem of vehicles mounting and driving along the footway at this location occurs multiple times every day because of the localised congestion present on this road. Annexe 2 of this document contains dozens of images demonstrating the severity and frequency of these conflicts between the pedestrian footway and vehicles.

8. The planning application contains no recognition or effective mitigation of this pedestrian hazard despite it making changes to the footway in the form of widening, strengthening and drop kerbs.
9. In fact, as proposed, the development will increase the frequency and severity of the conflicts between pedestrians and vehicles at the location. This is because the development includes the installation of new access roadways that will facilitate and encourage vehicles to mount and drive along the pedestrian footway.
10. In addition, the required footway design will reduce the kerb height at several places to comply with the pedestrian accessibility requirements listed in the Worcestershire CC Highways Dept Streetscape design guide. This will, in turn, further encourage drivers to mount and then drive along the footway at much higher speeds as the significant jolts associated with mounting the footway kerb will be removed.
11. It must also be noted that the proposed verge included in the resubmitted plans **does not** sit between the footway and the highway; instead, it sits on the development side of the footway. This is a serious oversight as it will offer no form of demarcation or protection to pedestrians from vehicles that mount and drive along the footway. Similarly, the absence of any type of bollard to prevent footway mounting and driving is of critical concern.
12. It is the professional opinion of the author* that **no** robust assessment of the consequences or cause of the pedestrian / vehicle conflicts has been undertaken by the developer as part of the planning application. Instead, the highway assessments undertaken have been focussed on the small number of additional vehicle journeys generated by the eight new houses or the speeds associated with vehicles travelling along the road. This is a significant mistake that fails to accurately represent or assess the true nature of the highway hazards present at the location or the negative impact the development will have on reduced pedestrian safety. (** The author is a Technical Director for Highway Asset Management with a leading civil engineering consultancy and has over 16 years' experience in this profession which includes extensive work supporting Highway Development Control Officers.*)
13. This failure to undertake a full and appropriate assessment of all highway hazards, which fully includes the risk to pedestrians and then mitigate them appropriately, appears to breach the guidelines and stipulations contained within the National Planning Policy Framework. In **section 9 - Promoting Sustainable Transport, paragraph 110A** states "**development should; give priority to pedestrian and cycle movements, both within the scheme and within neighbouring areas**" and perhaps even more importantly in **paragraph 110C** "**create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles....**"
14. Throughout the planning application process for both the previous application 18/00282/FUL as well as this resubmitted application, the Parish Council has repeatedly emphasised the importance of addressing the pedestrian safety issues present at the location to both the Developer and to Worcestershire CC Highways Dept.
15. Large volumes of demonstrative evidence in the form of photographs and video that shows vehicles driving along the footway at the location were provided to the Worcestershire CC Highways Dept, much of which can be viewed in annexe 2 of this document.
16. Despite this volume of demonstrative evidence and the legal obligations they carry towards the safety of all road users including pedestrians, it is highly concerning that Worcestershire CC Highways Dept in their response to this application make no meaningful reference to pedestrian safety. This omission brings serious doubts over the depth and quality of their assessment of this planning application and the understanding of the impact the development will have on highway and pedestrian safety going forward.

17. It should also be noted that in relation to the first planning application, 18/00282/FUL, the Parish Council submitted a Freedom of Information (FOI) request to Worcestershire CC Highway Dept in December 2018 to obtain the specific detail and depth of the assessments that had been undertaken by Worcestershire CC Highways Dept (annexe 3). The FOI response showed that the statement made to Bromsgrove Planning Committee in December 2018, which indicated that a full and robust assessment had taken place was a gross-mistruth. **No** industry recognised safety assessment had been completed, and no representative of the highway department had actually visited the site for any safety assessment purposes.
18. As stated, the Parish Council has captured and made available large volume of demonstrative video evidence that clearly shows the levels of pedestrian and highway safety hazards that are present at the location. During a 14-day period in early November 2018, more than **80** examples of hazardous traffic safety incidents were captured, which equates to more than **2000** safety incidents occurring at the location annually. A short video montage showing these hazards and their broader context was prepared and made available to all parties during the submission of the previous application. This evidence can be viewed at <https://youtu.be/CuRctbQ8nmU>
19. To demonstrate that the evidence was not unusual or isolated, a second 14-day period of monitoring was undertaken during April and May 2019. This next exercise was explicitly focussed on capturing incidents of vehicles driving on the pedestrian footway in front of the development location. **25** such example incidents were captured, equating more than **650** incidents of this type occurring annually.
20. Both batches of evidence have been declared as formal records by the Parish Council and would, therefore, be available for use in any future investigation or legal proceedings. Annexe 2 of this document contains time-stamped images drawn from these captured safety incidents which we formally submit as evidence to the planning committee for their full consideration.

Richard Arrowsmith,

Romsley Parish Council Chairperson
June 2019

Annexe 1 – Background information regarding location and traffic safety issues present at the location

For background information, the development will be positioned on St Kenelm's Road opposite the busy Co-op community shop and Post Office at a location where the road geometry and layout are highly problematic.

- The road can be sporadically hectic and carries a mixed load of private cars, buses, towed caravans and commercial vehicles accessing local farms and businesses. It is the gateway to our community and sits at the centre of our Parish.
- The road is relatively narrow and is effectively a single lane for the 40 plus metres directly outside the development as one lane contains marked parking bays that are in continuous use.
- The parking bays are supported by an existing Traffic Regulation Order (TRO) that was paid for under a section 106 contribution when the shop was developed circa 2011. The TRO with associated road markings were authorised and implemented by Worcestershire CC Highway Dept.
- St Kenelm's Road also has a significant sweeping bend which, in combination with the parked cars, hampers vehicle visibility. Cars frequently commit to the available single lane from both directions; they meet each other and have nowhere to go unless they mount and drive along the pedestrian footway in front of the proposed development site. These conflicts between vehicles and pedestrians, cycles and other vehicles are frequent and occur multiple times every day, particularly during peak periods.
- There is a clear causal link between the pedestrian safety issues and the traffic congestion problems occurring at this location. As such, any solution to the pedestrian hazard must treat the cause of the problem and not just the symptom. The most sustainable solution is for the development to improve the road layout and traffic flow through a combination of road widening on the development side and the creation of a layby outside the Co-op. These changes should be reinforced with verges and bollards, positioned between the footway and road, to improve the demarcation of the vehicle and pedestrian spaces.
- The traffic safety and congestion issues at the location are a significant issue in the community, impacting upon all resident's access to critical commercial services, such as the Post Office and having a detrimental impact on the quality of life of many residents who live close by. Several homes in the vicinity do not have driveways and have experienced damage to their vehicles; many others experience being blocked-in multiple times every day. The section of footway in front of the development is widely used by people walking to the local pub and shops. It is also one of the busiest dropping off points for the school bus that is utilised by all the Parish's children.
- Everyone in our community agrees 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 within our community.



Annexe 2 – Visual examples of the Highway Safety Hazards present at the location mounting and driving along the pedestrian footway at the location of the proposed development.

The following images are examples of the visual evidence was captured by the Parish Council and members of the community during two separate monitoring periods.

The **Batch 1** one photographs were captured between 4th November 2018 to 18th November 2018 with a break in the monitoring of 6 days between 11th and 16th due to the unavailability of a resident to look at the videos.

The **Batch 2** photographs were captured between 16th April 2019 and 3rd May 2019.

All the images have been taken from the same camera which is looking in a westerly direction and is located by the blue circle on the aerial image below. The proposed development runs the full length of the footway on the right-hand side of the images. The drop kerbs to permit driveways will also run along the full length of this footway.



Other than for the redaction of people's faces, vehicle registrations or distinctive vehicle markings to Comply with GDPR requirements, the images that have not been changed or augmented in any way.

The presented examples focus on vehicles driving on the pedestrian footway, with a number capturing direct conflicts between vehicles and pedestrians, including two incidents where the vehicles come into contact with a pedestrian and a cyclist. In total, 36 examples are provided.

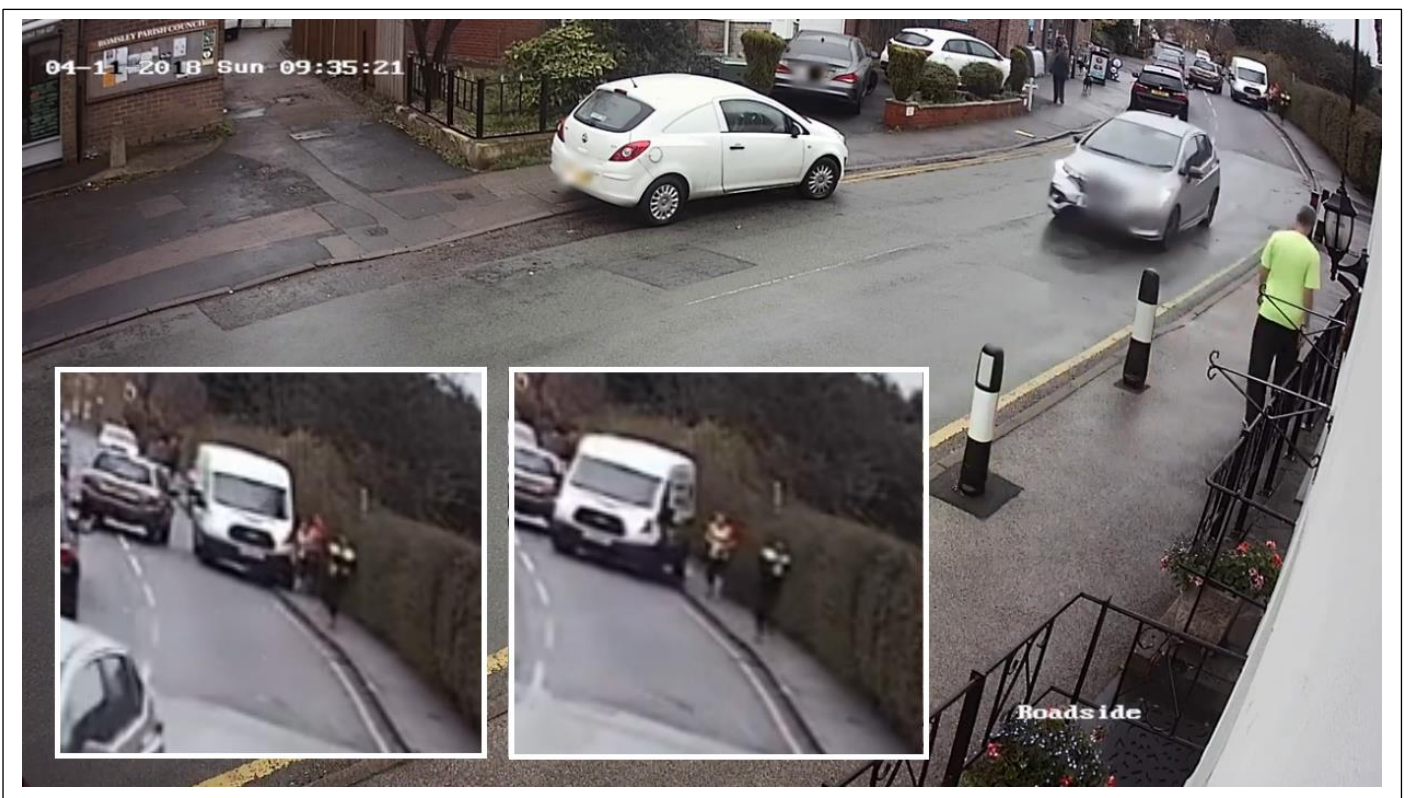
However, during these monitoring periods, many other examples of congestion and safety-related issues were captured.

The video of these can be seen at <https://youtu.be/CuRctbQ8nmU>, which provides a much greater contextual understanding of the problems.

Batch 1 Friday 2nd November 2018 – Parish bus has to drive along the full length of the pedestrian footway to avoid congestion.



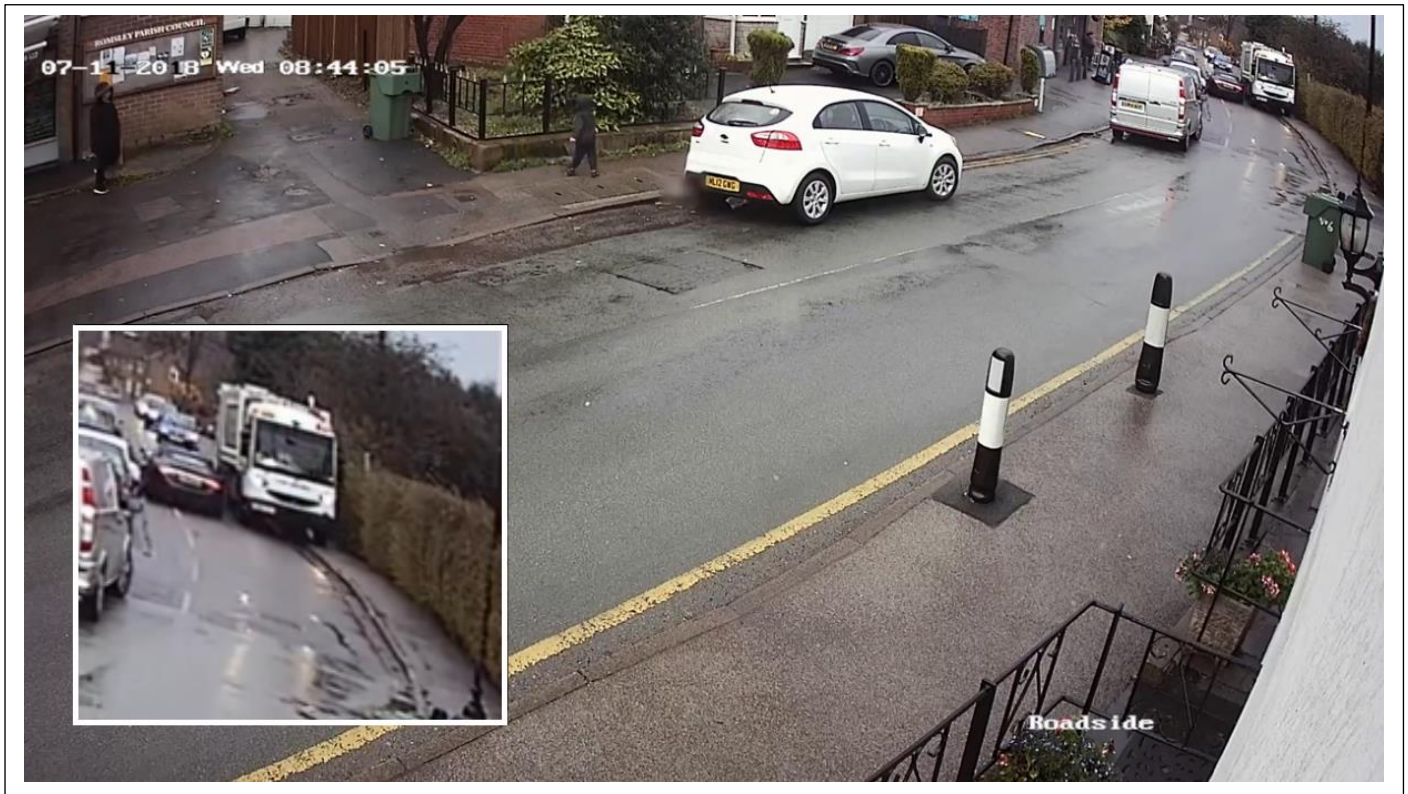
Batch 1 Sunday 4th November 2018 – light goods vehicle driving along the footway collides with a number of pedestrians who were using the footway for running. The driver claimed not to have seen them because he was concentrating on oncoming traffic.



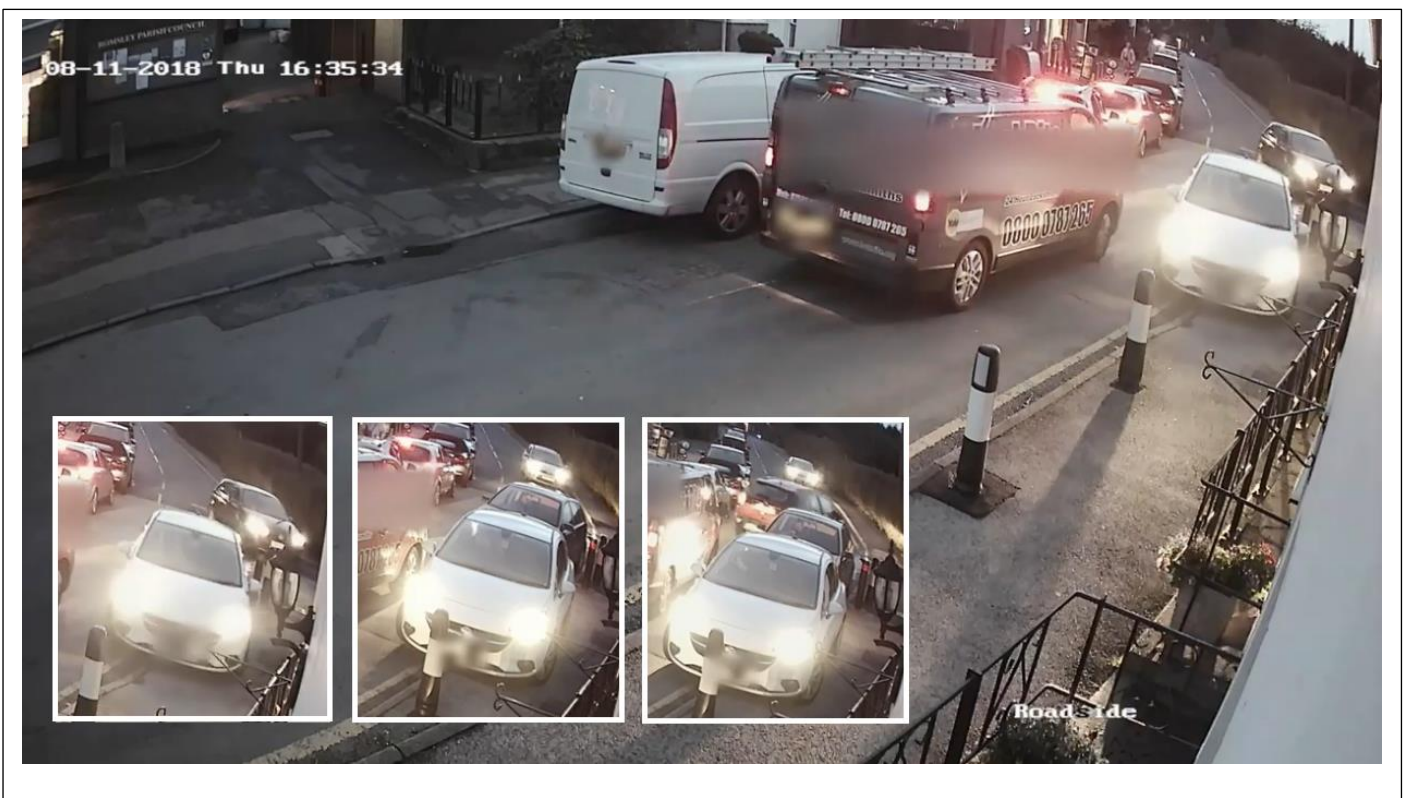
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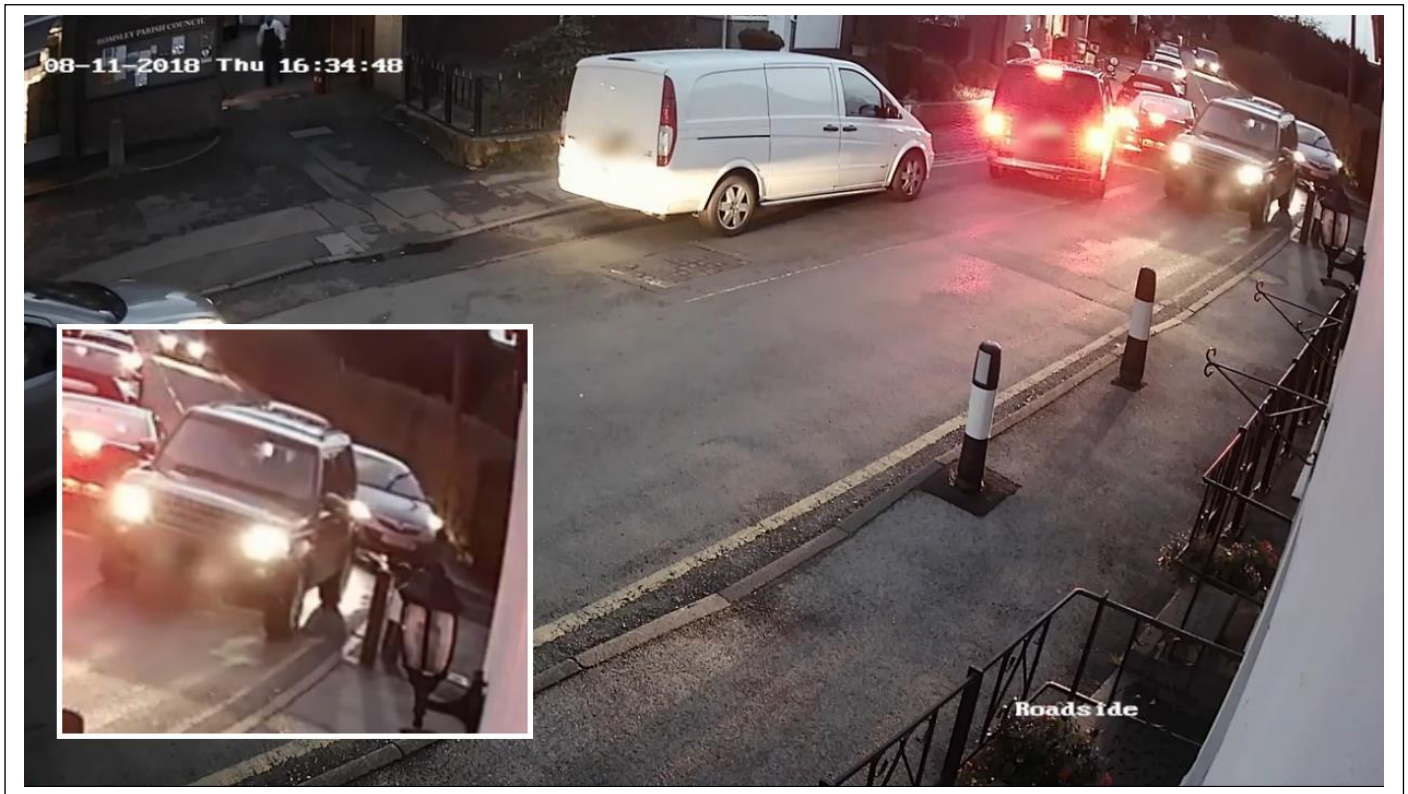
Batch 1 Wednesday 7th November 2018 – Refuse collection vehicle drives along footway to avoid blocking road whilst collecting bins.



Batch 1 Thursday 8th November 2018 – Multiple vehicles pull and drive along footway to avoid congestion.



Batch 1 Thursday 8th November 2018 – Multiple vehicles pull and drive along footway to avoid congestion.



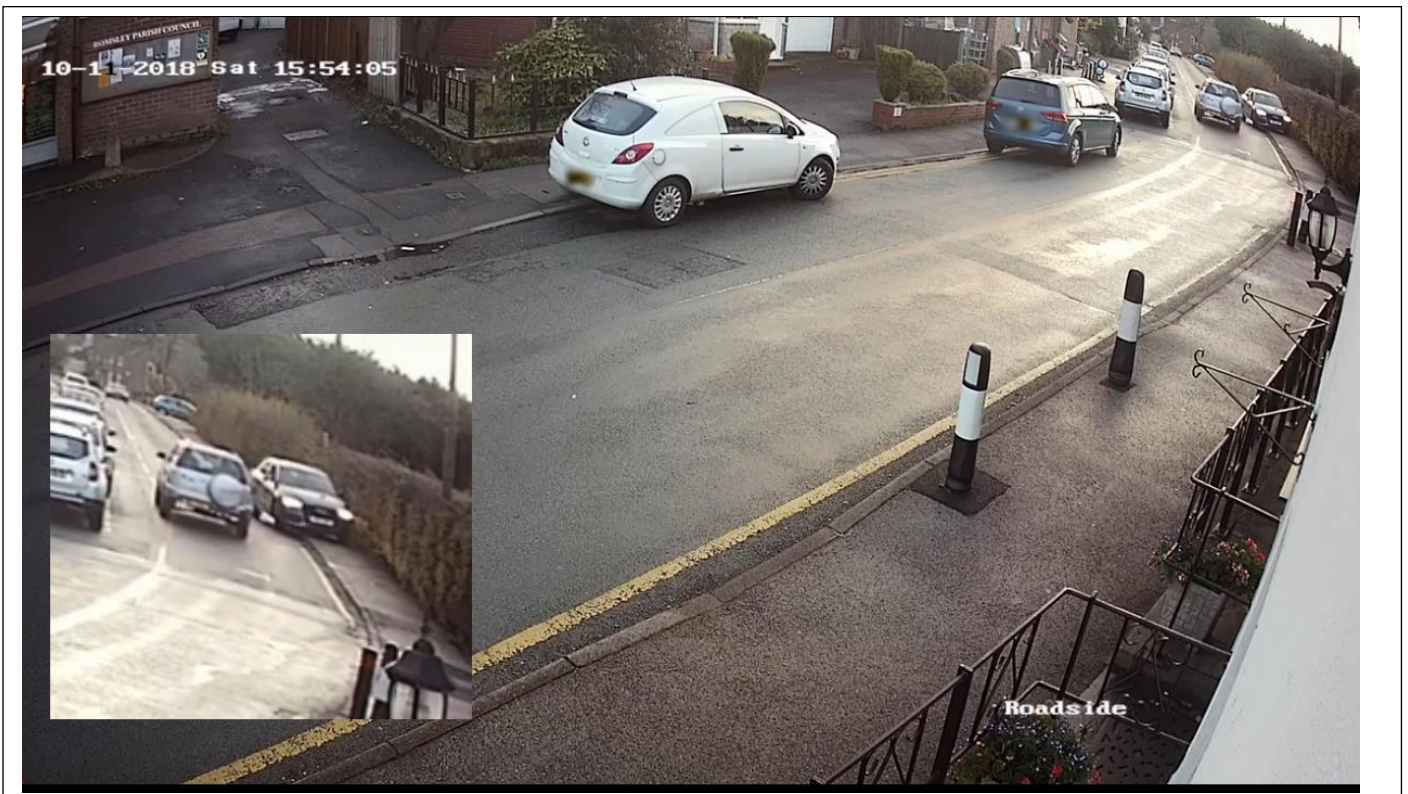
Batch 1 Friday 9th November 2018 – Multiple cars and a Light Goods Vehicle (LGV) mount the kerb and drive along footway to avoid congestion.



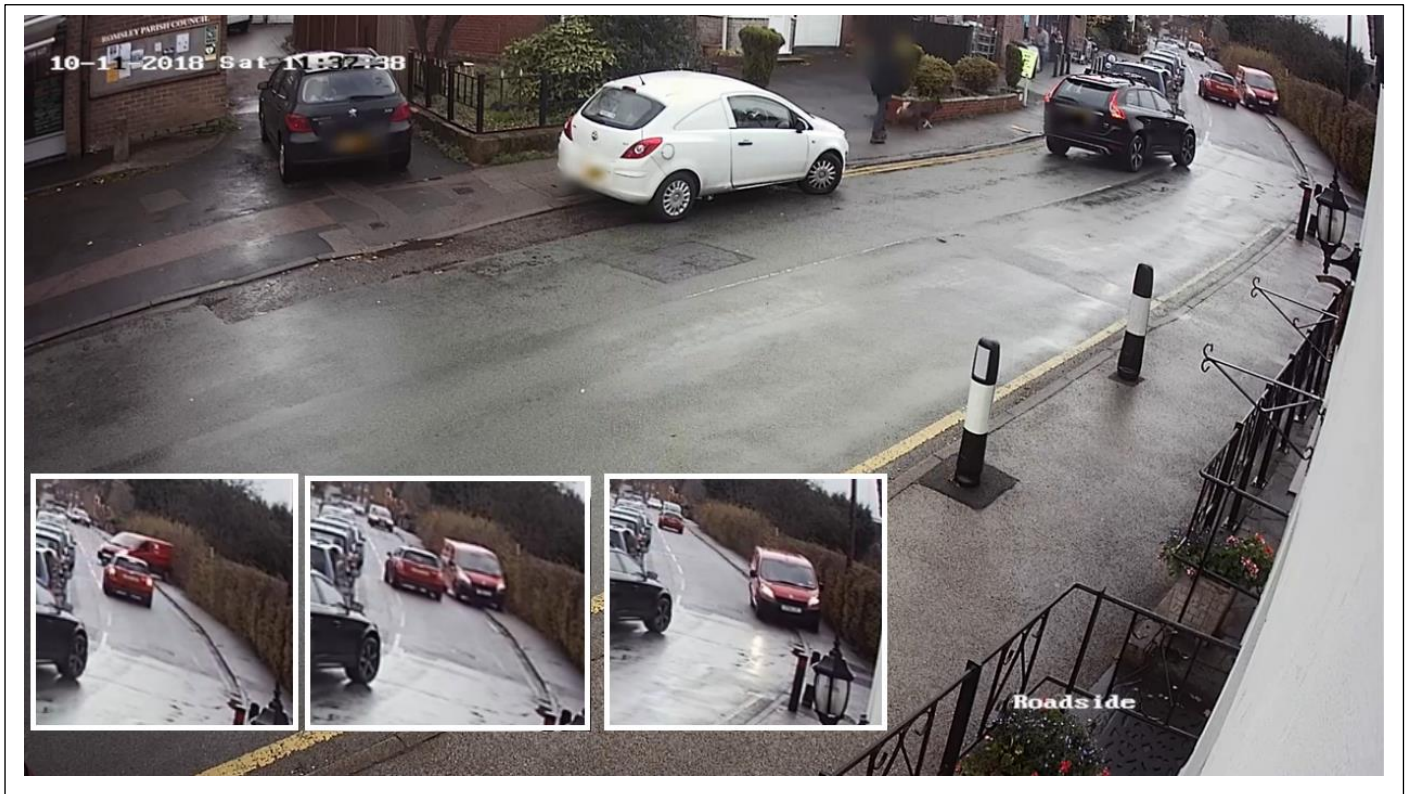
Batch 1 Friday 9th November 2018 – Multiple cars and a Light Goods Vehicle (LGV) mount the kerb and drive along the footway. There is also a conflict between bus and pedestrian crossing the road.



Batch 1 Saturday 10th November 2018 – Vehicles drive along footway at speed.



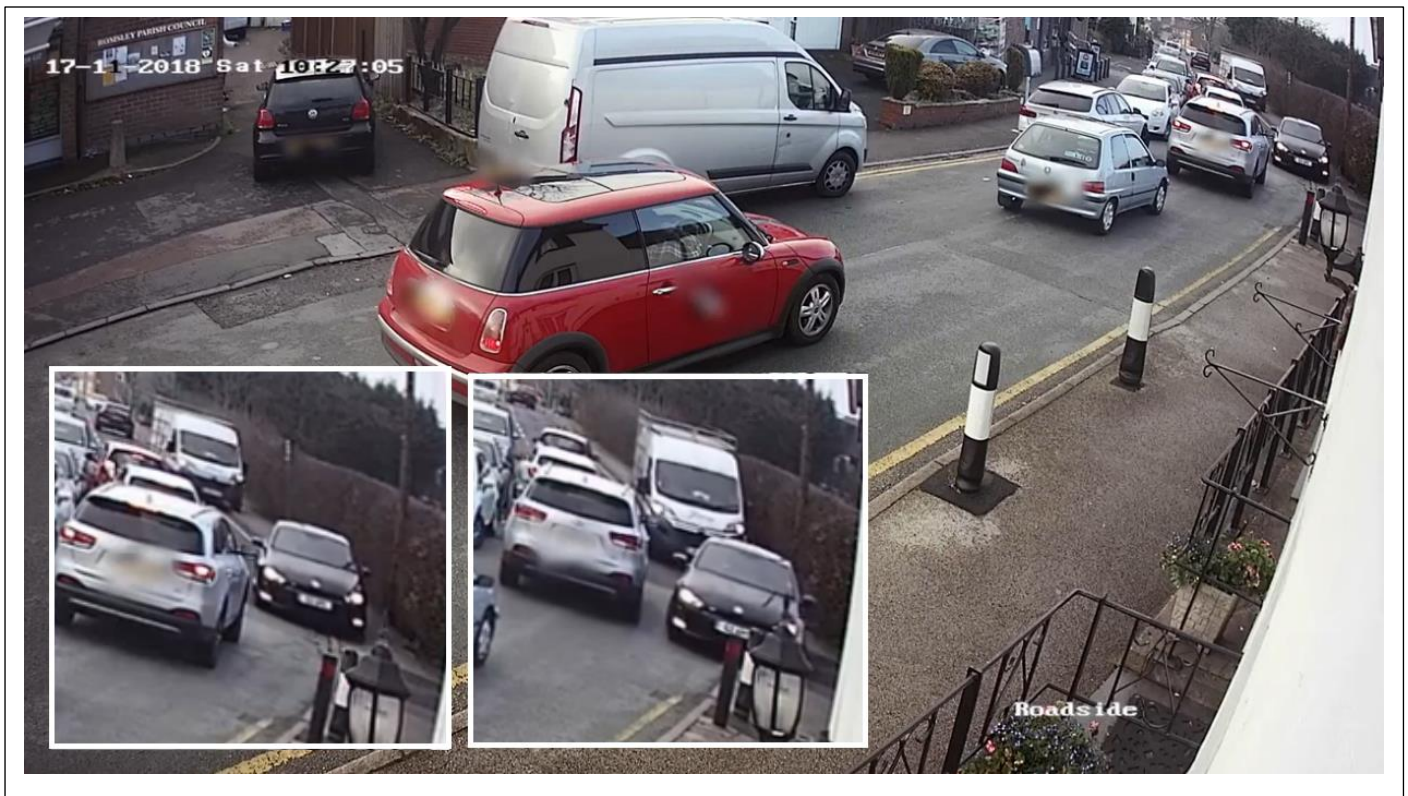
Batch 1 Saturday 10th November 2018 – Delivery vehicle attempts to turn around by mounting the footway and then drives along it.



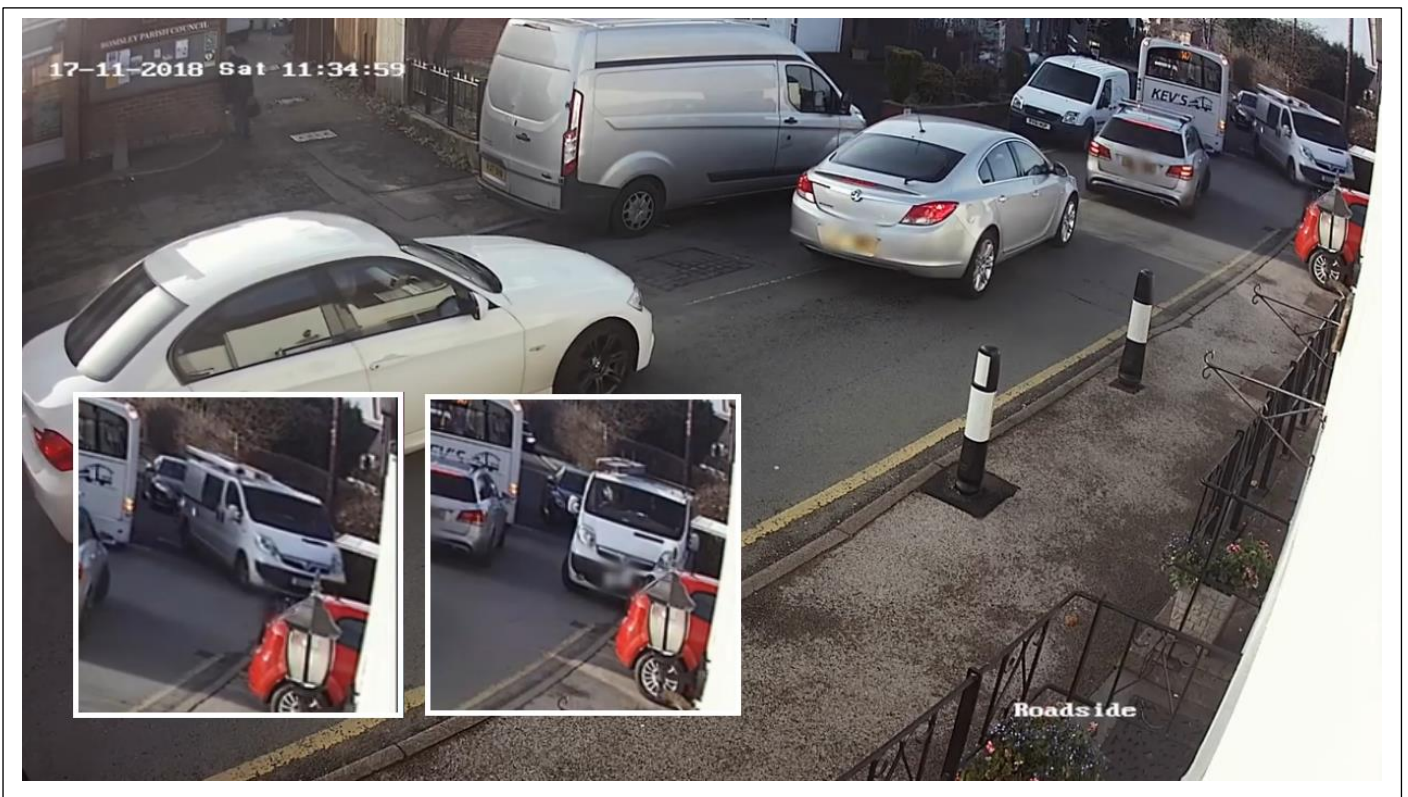
Batch 1 Saturday 10th November 2018 – Vehicles drive along footway to pass another vehicle.



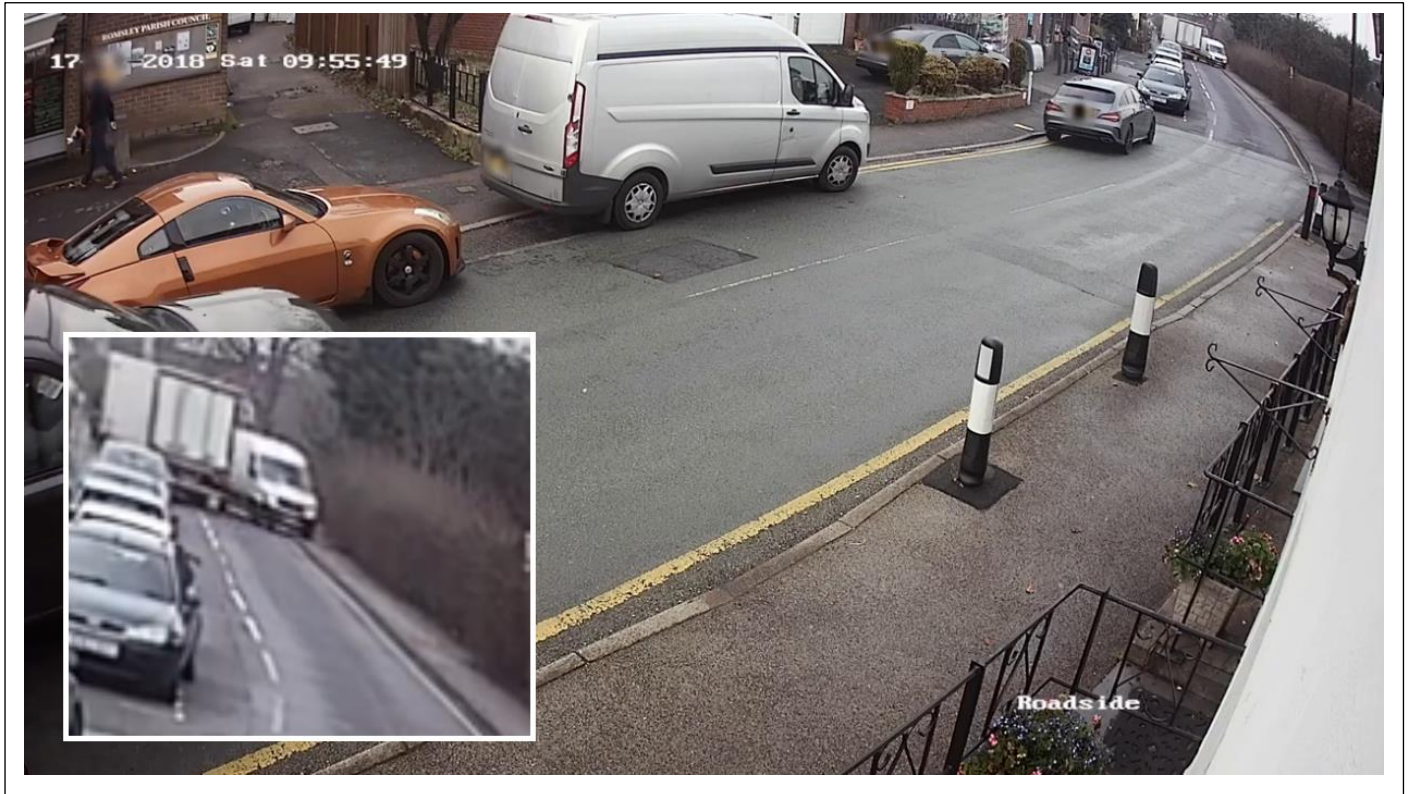
Batch 1 Saturday 17th November 2018 – Multiple vehicles drive along footway to avoid congestion.



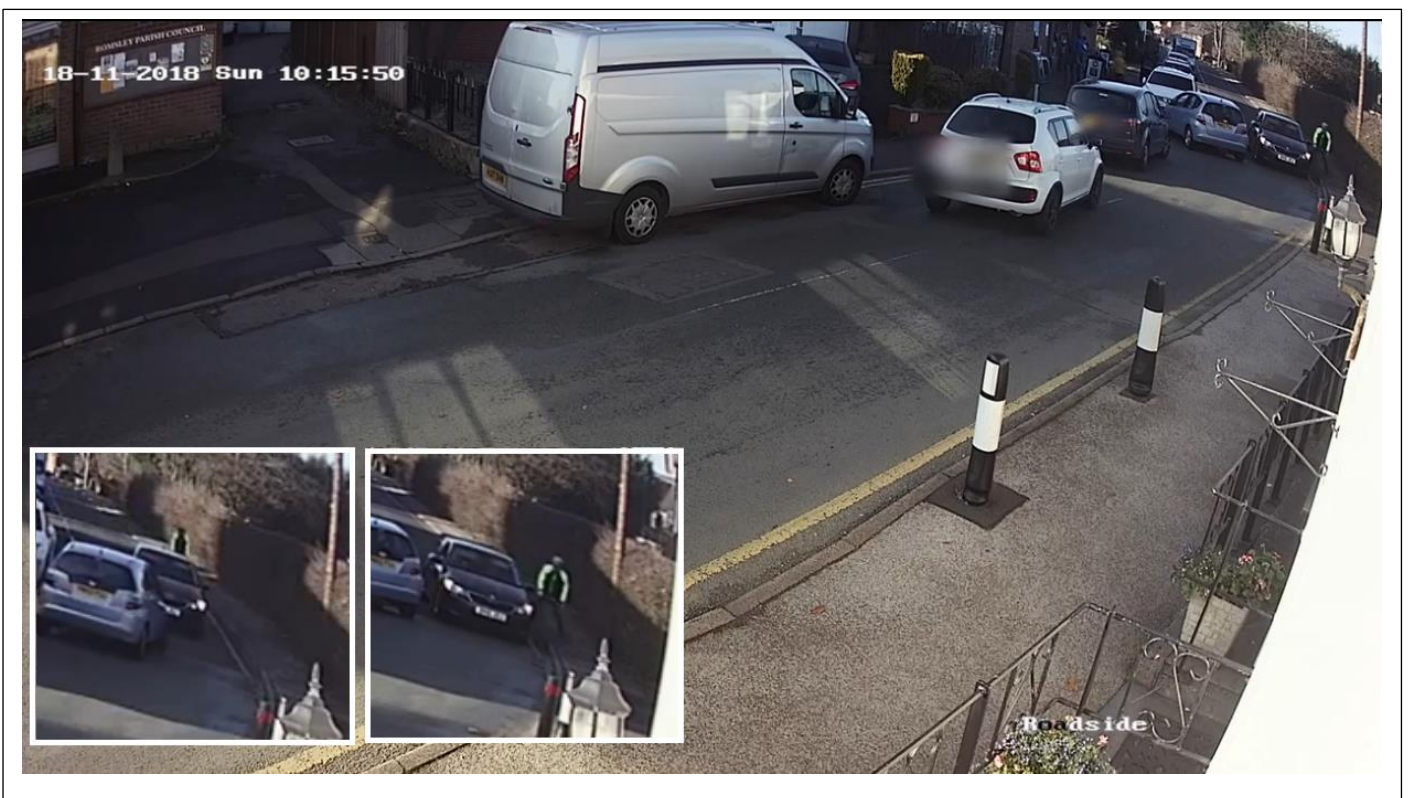
Batch 1 Saturday 17th November 2018 – Multiple vehicles drive along footway to avoid congestion.



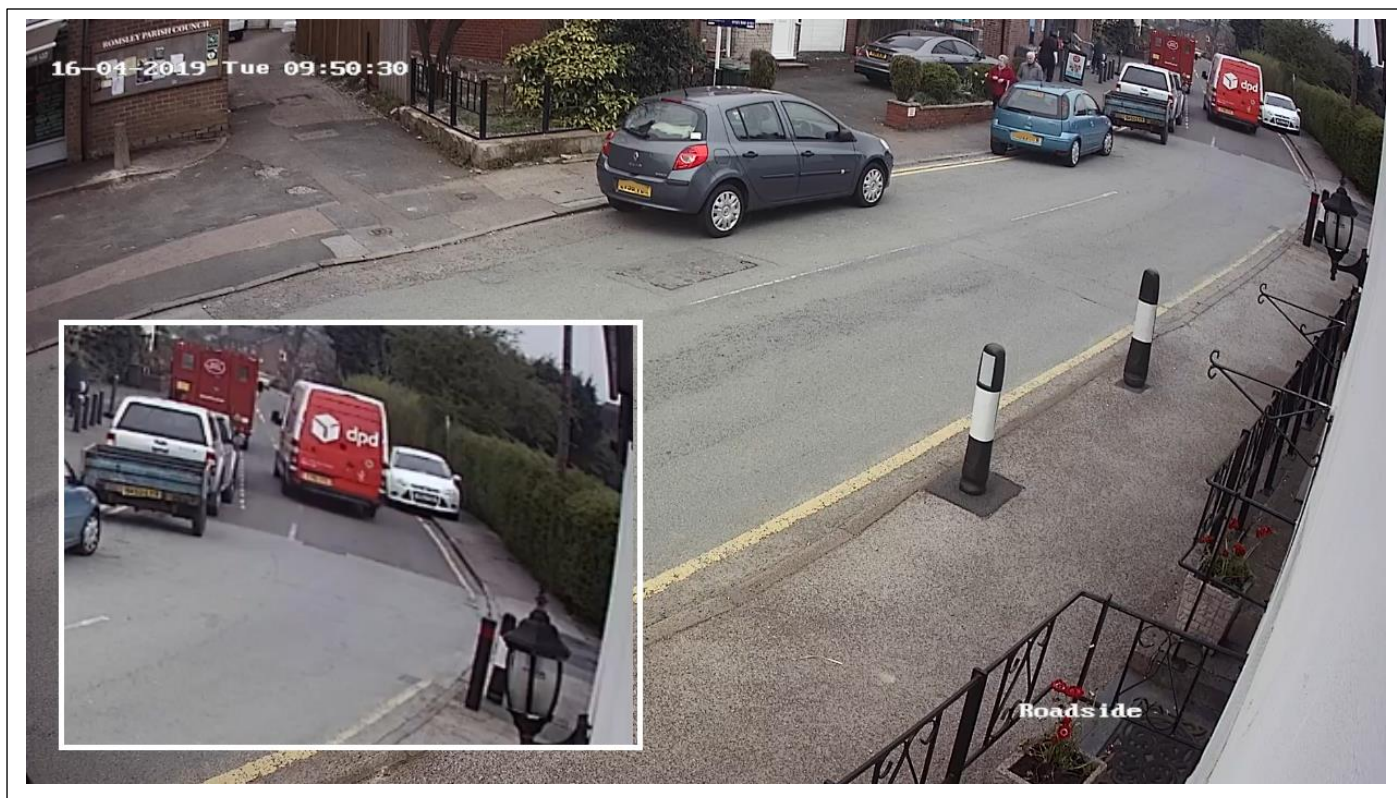
Batch 1 Saturday 17th November 2018 – Two delivery vehicles nearly collide, and one has to mount the footway to avoid the other.



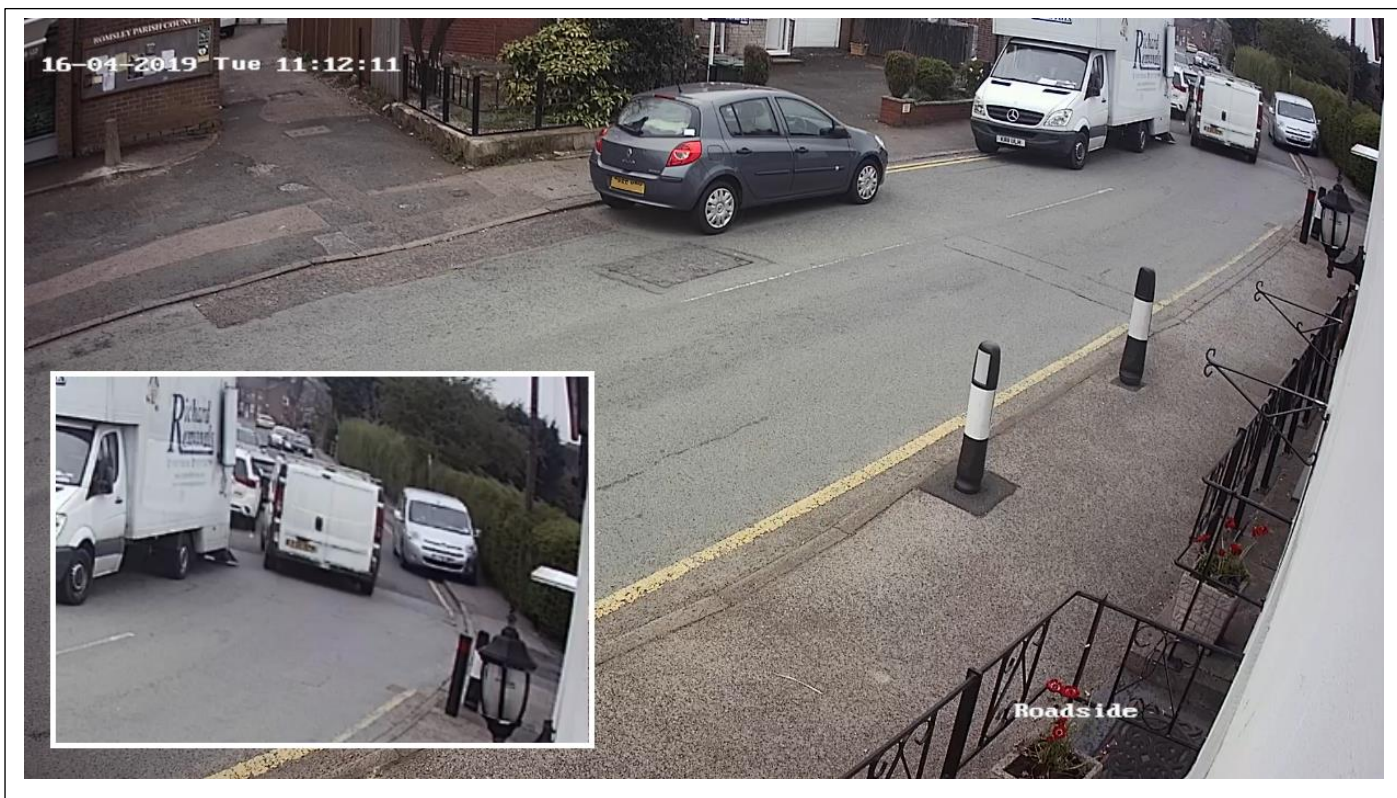
Batch 1 Sunday 19th November 2018 – A cyclist is struck by a vehicle attempting to manoeuvre onto the footway to avoid another car travelling directly towards it.



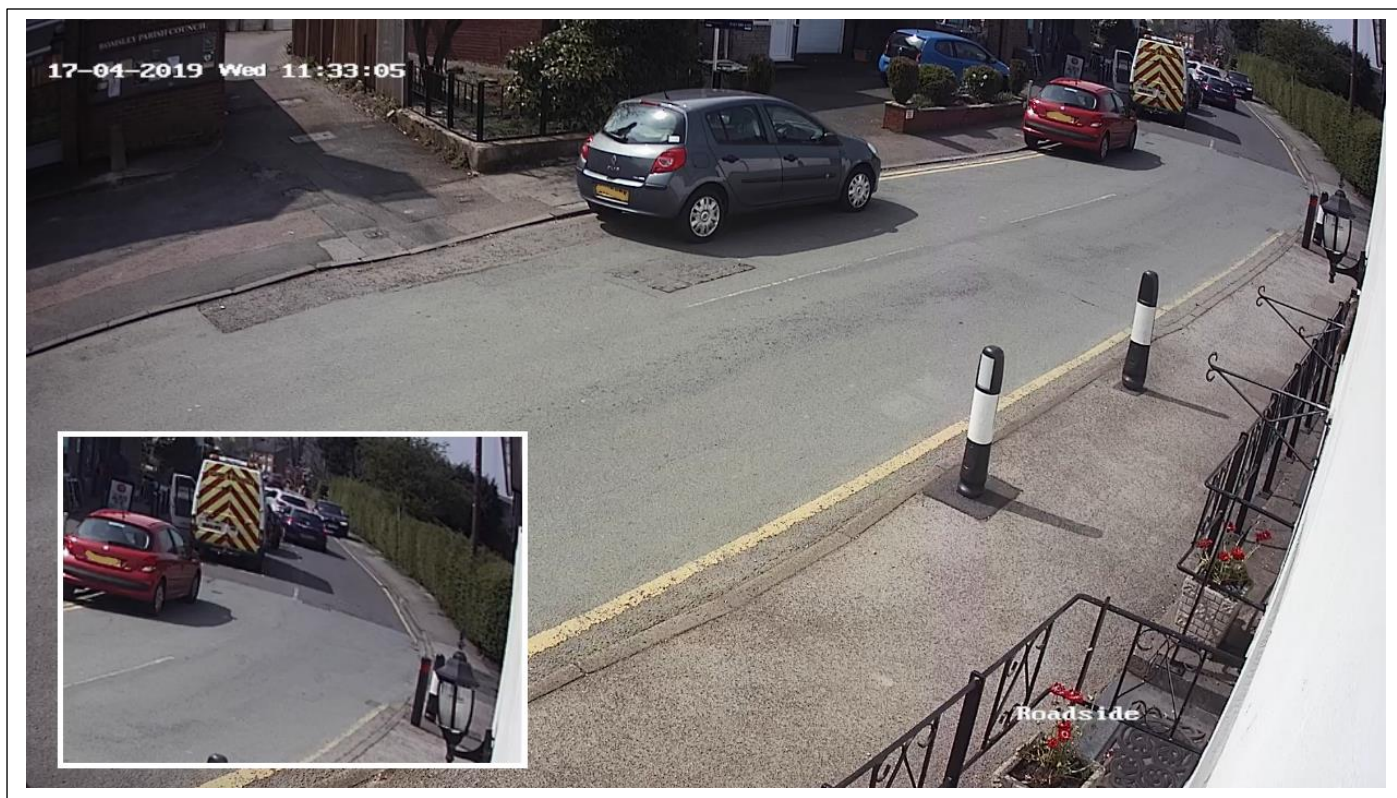
Batch 2 Tuesday 16th April 2019 – Car mounts and drives along the footway at speed.



Batch 2 Tuesday 16th April 2019 – Car mounts and drives along the footway to avoid stop[ping for a light goods vehicle.



Batch 2 Wednesday 17th April 2019 – Car mounts and drives along the footway.



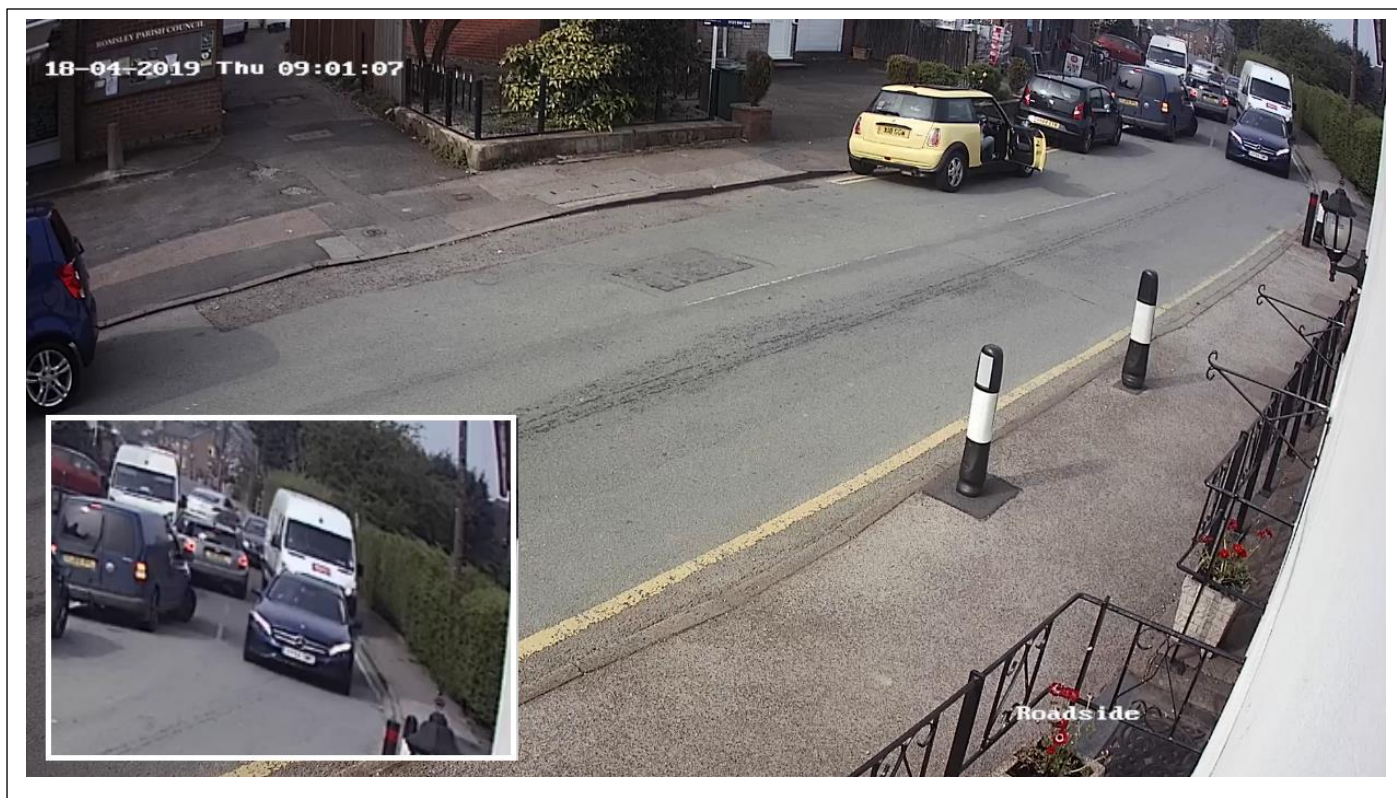
Batch 2 Wednesday 17th April 2019 – Car mounts and drives along the footway to avoid the Parish Bus.



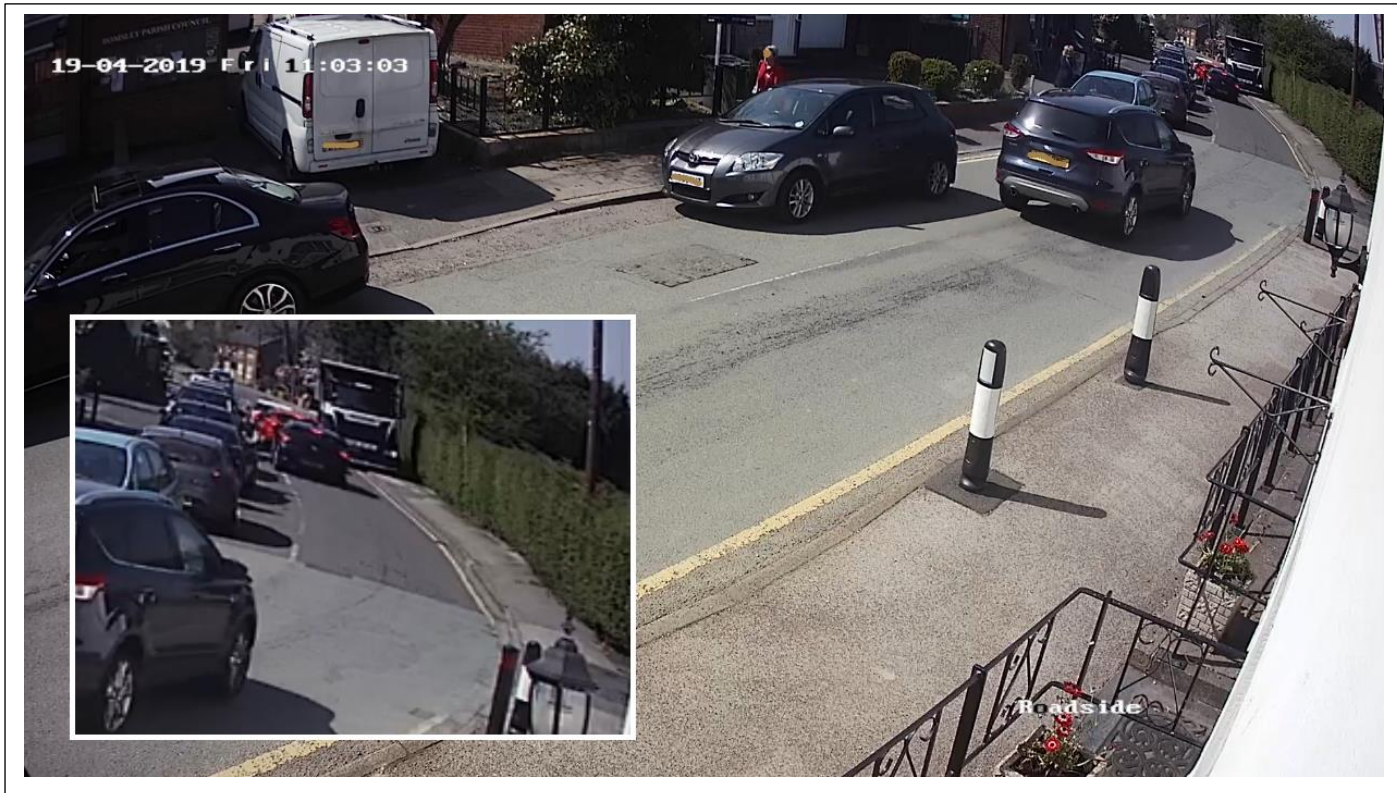
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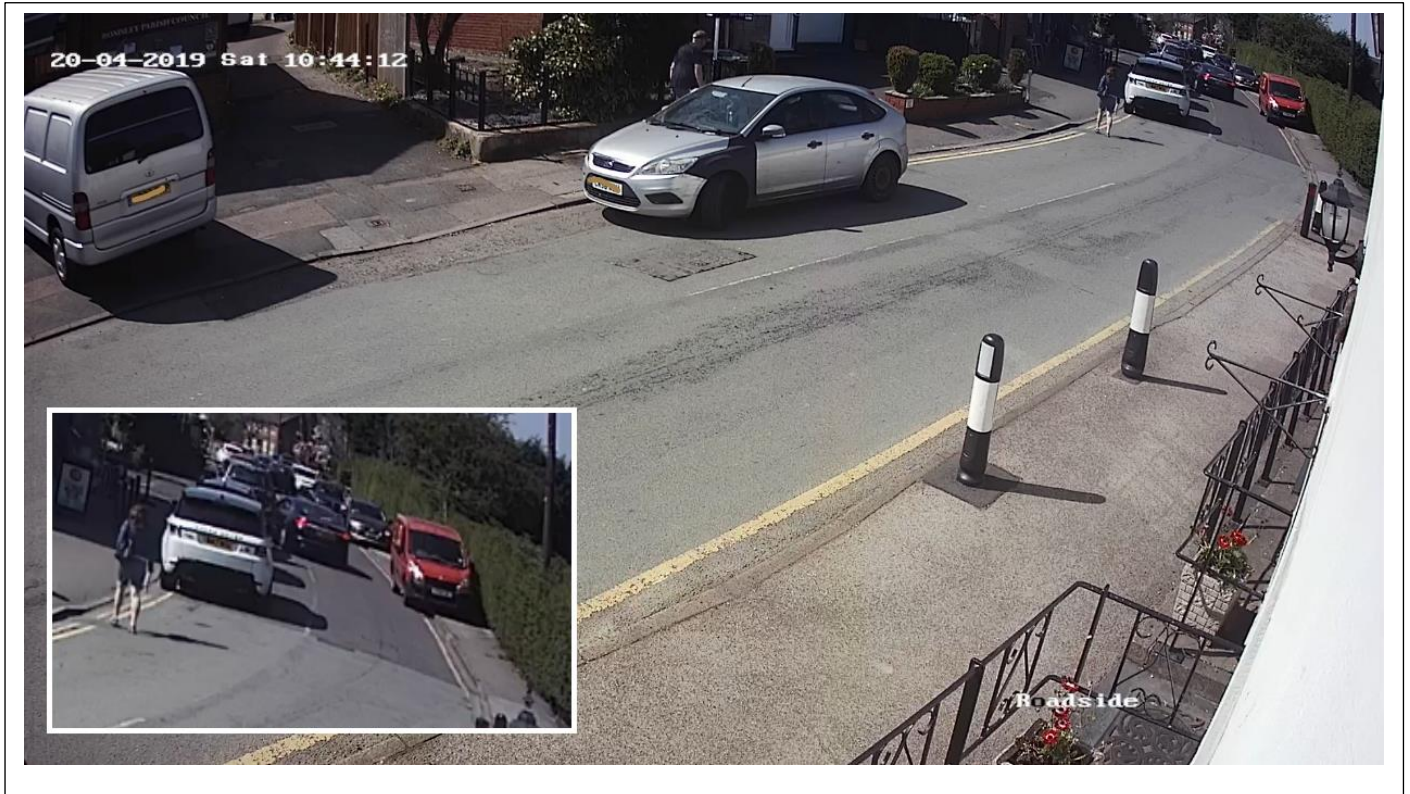
Batch 2 Thursday 18th April 2019 – Light Goods Vehicle mounts the footway to maintain progress.



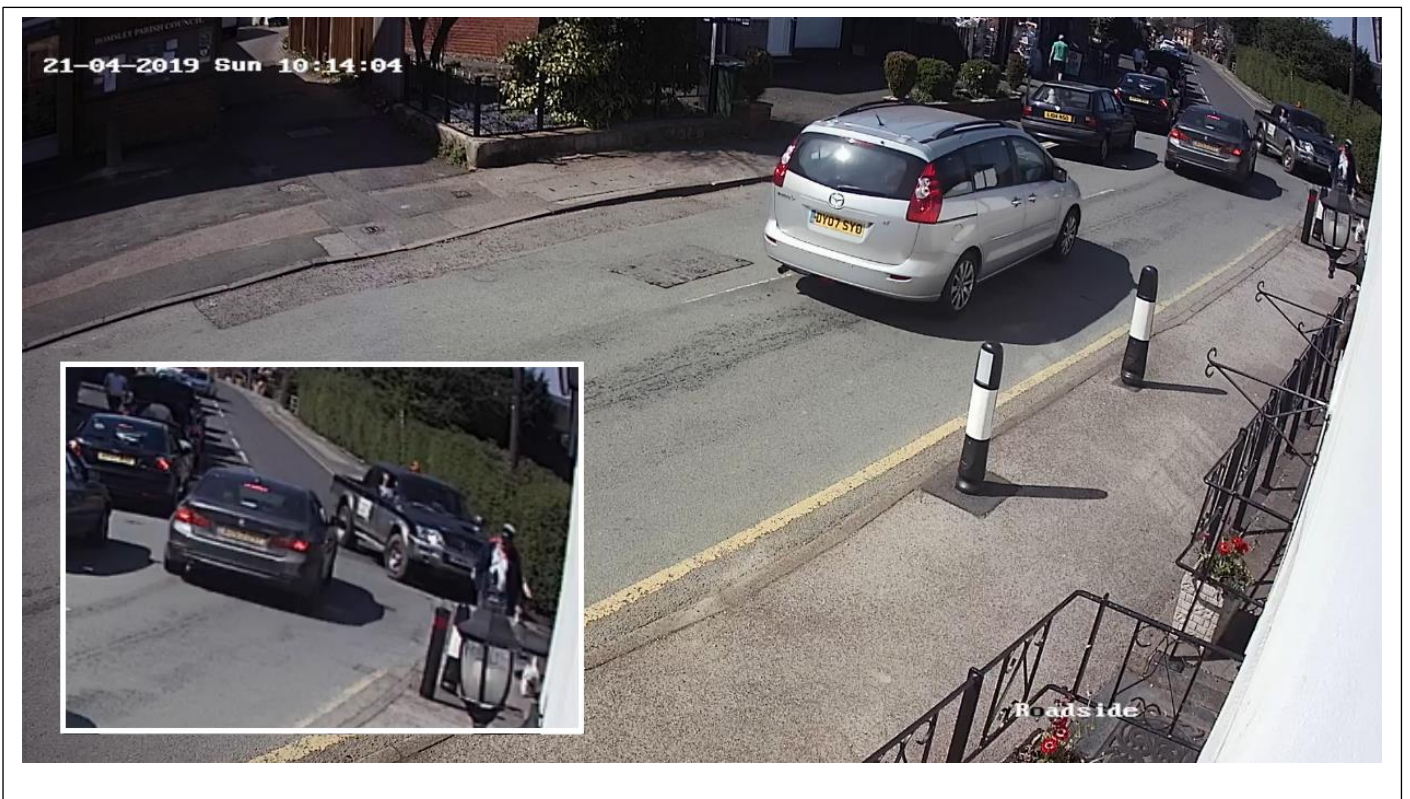
Batch 2 Friday 19th April 2019 – A Heavy Goods Vehicle (HGV) mounts and drives along the footway



Batch 2 Saturday 20th April 2019 – A Light Goods Vehicle and multiple vehicles mount and drive along the footway.



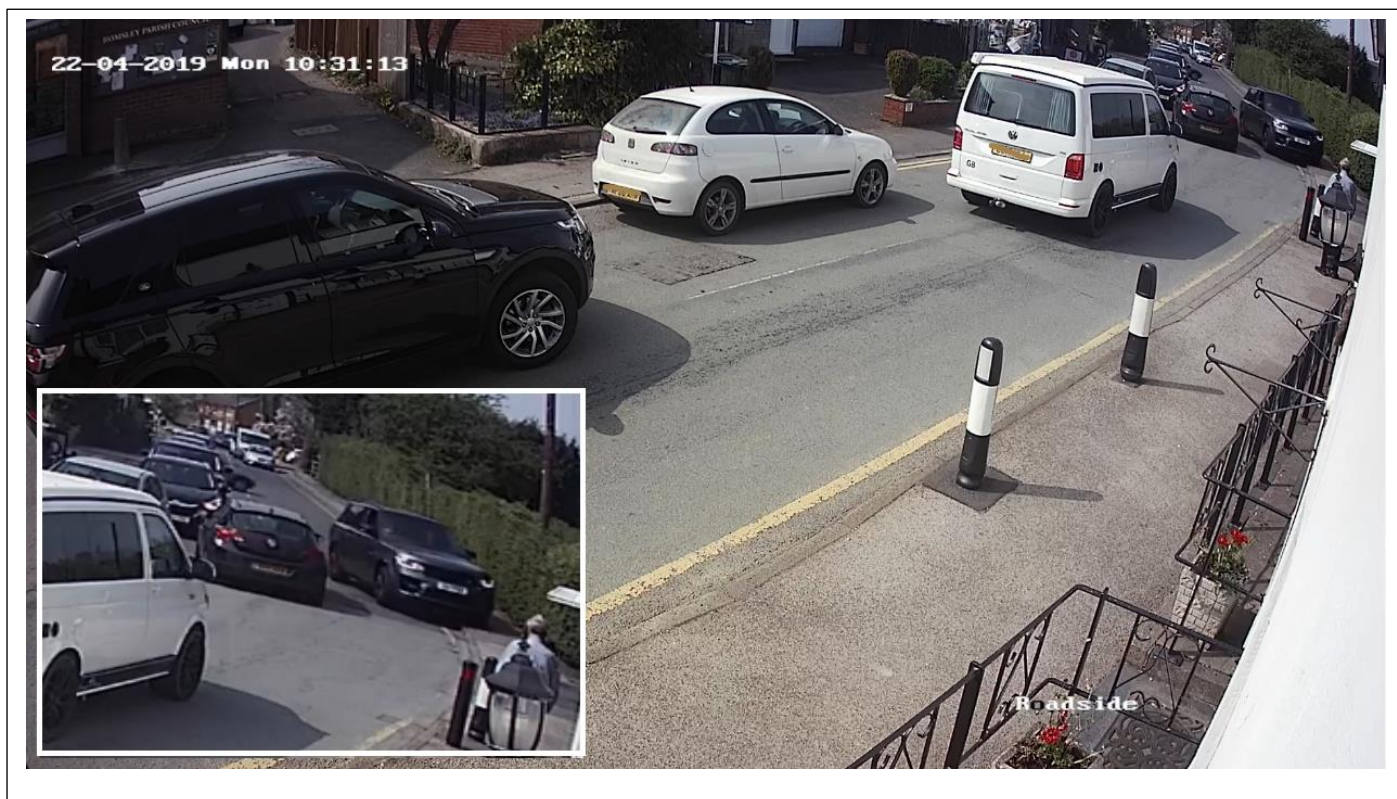
Batch 2 Sunday 21st April 2019 – A Light Goods vehicle mounts the footway to allow other vehicles to pass whilst pedestrians are in close proximity.



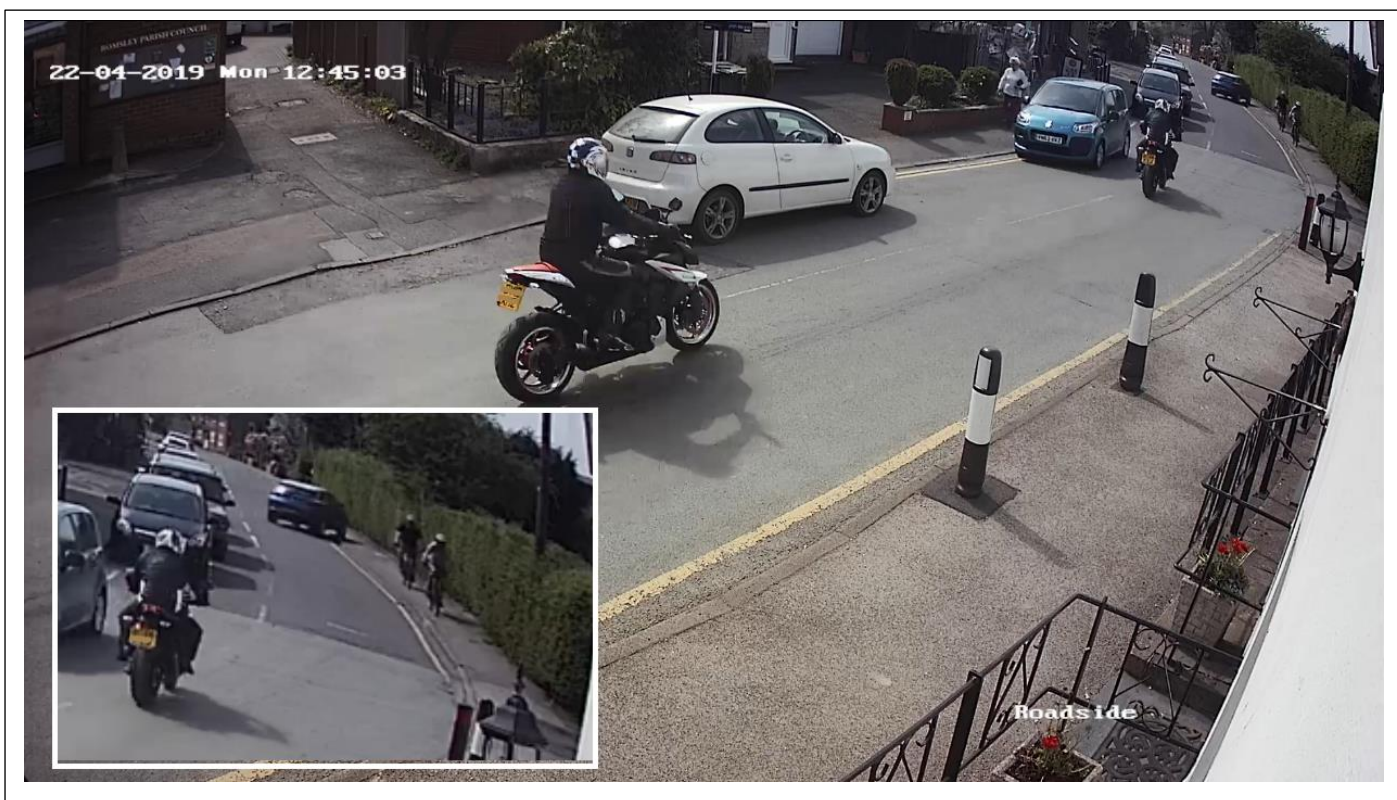
Batch 2 Monday 22nd April 2019 – A car mounts the footway to allow other vehicles to pass.

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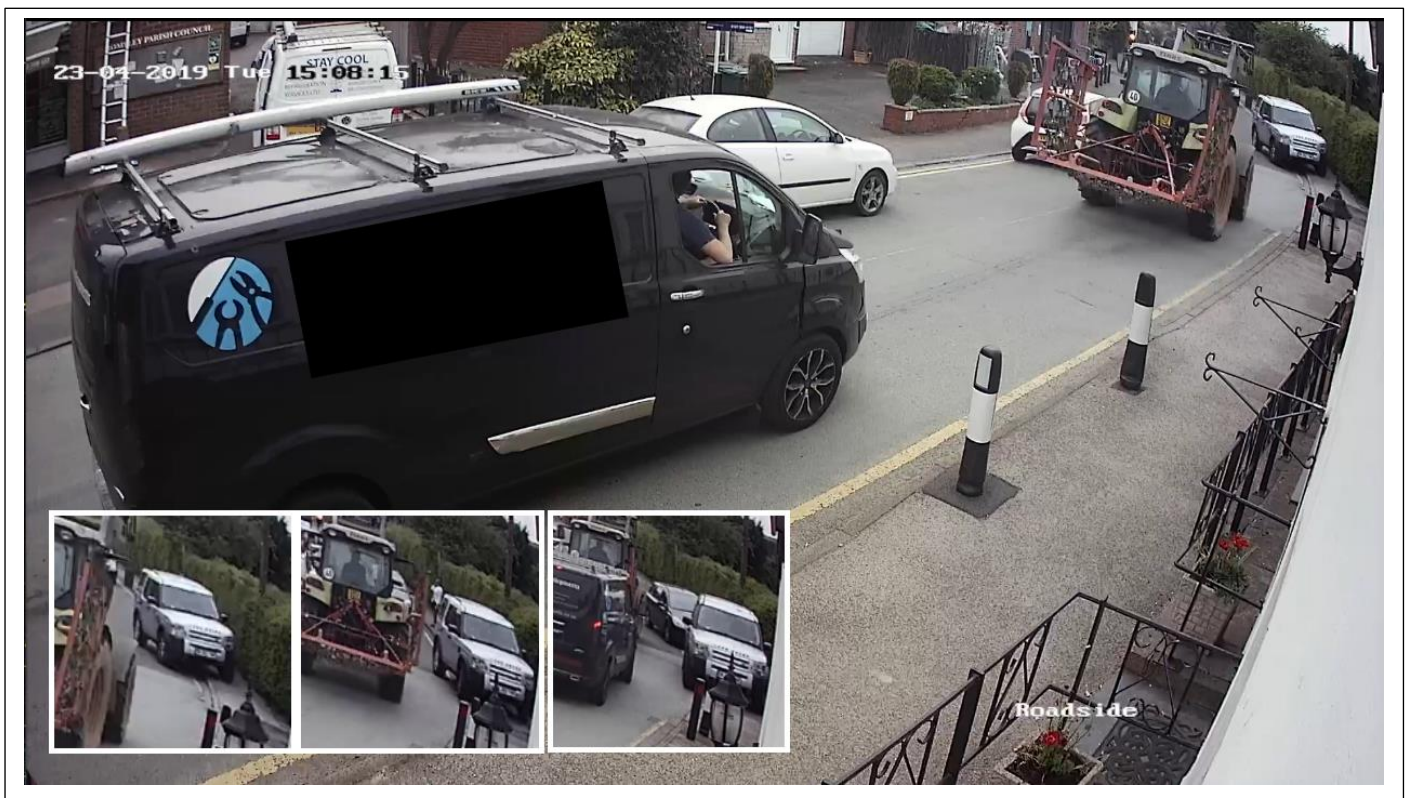
Batch 2 Monday 22nd April 2019 – A vehicle driven erratically mounts the footway.



Batch 2 Tuesday 23rd April 2019 – A car mounts and drives along the footway to avoid a car and caravan.



Batch 2 Tuesday 23rd April 2019 – Multiple vehicles mount and drive along the footway to avoid congestion



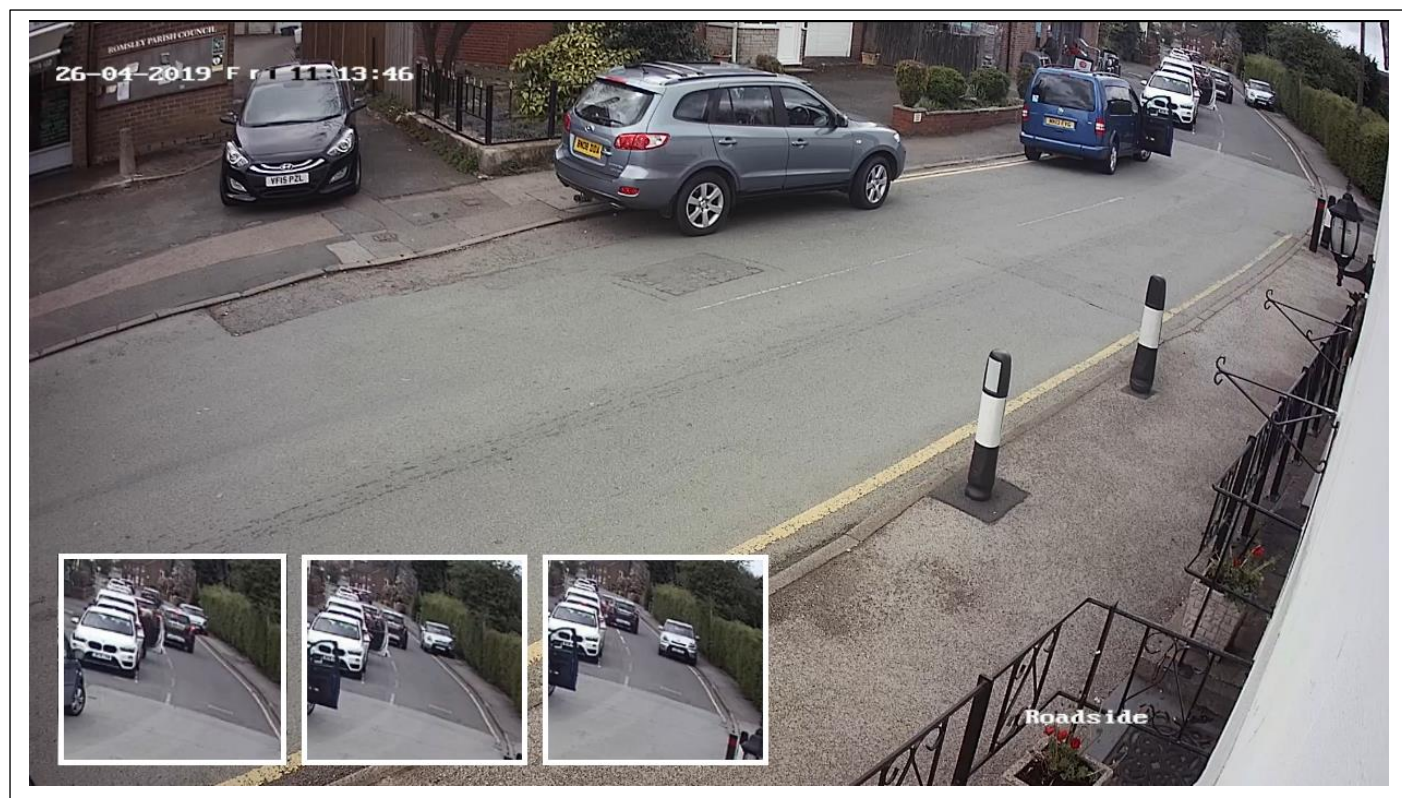
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Batch 2 Friday 26th April 2019 – A car mounts and drives along the footway at speed to avoid congestion.



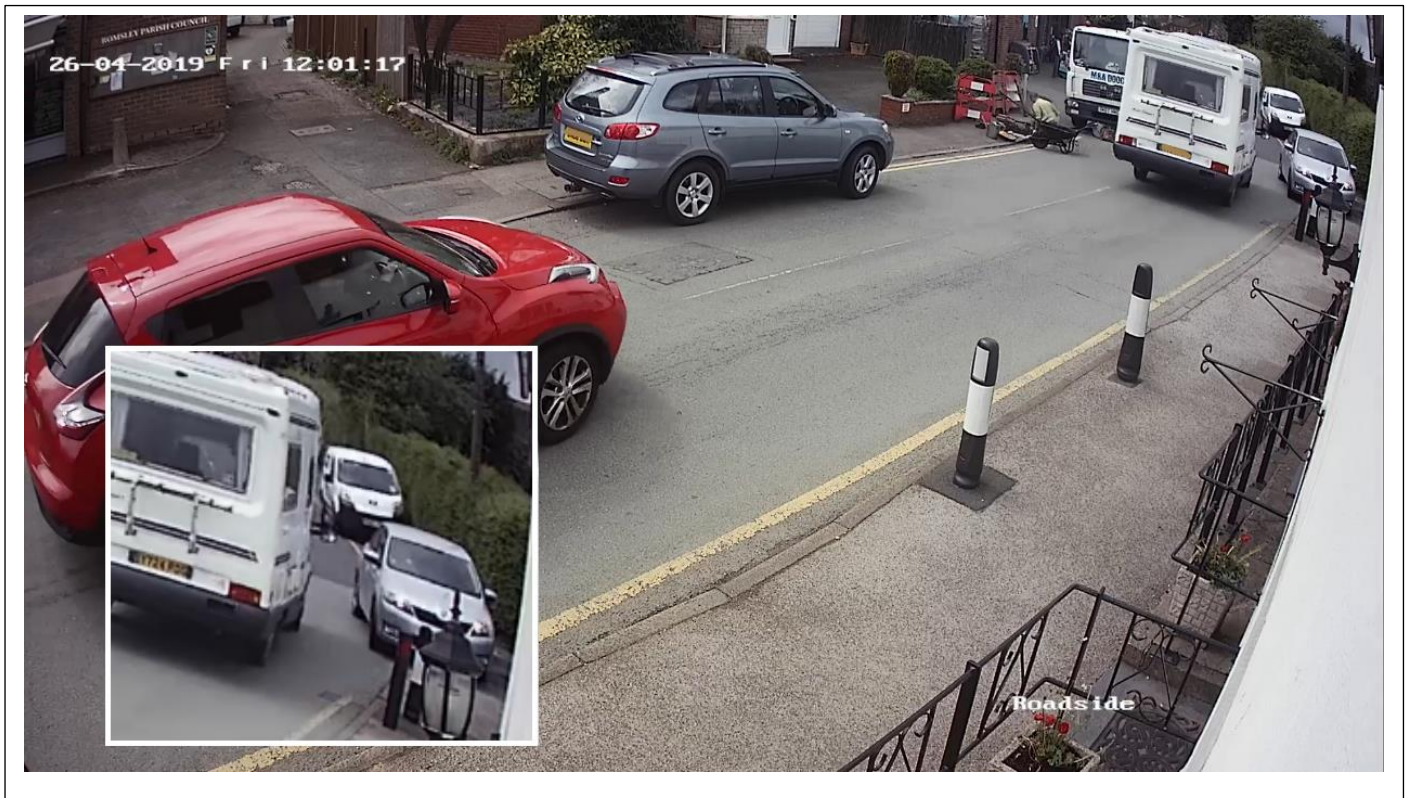
Batch 2 Friday 26th April 2019 – A car mounts and drives along the full length of the pedestrian footway at speed to avoid congestion.



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Batch 2 Friday 26th April 2019 – Multiple vehicles mount and drive along the full length of the pedestrian footway at speed to avoid congestion.



Batch 2 Friday 26th April 2019 – A car mounts and drives along the pedestrian footway to avoid congestion.



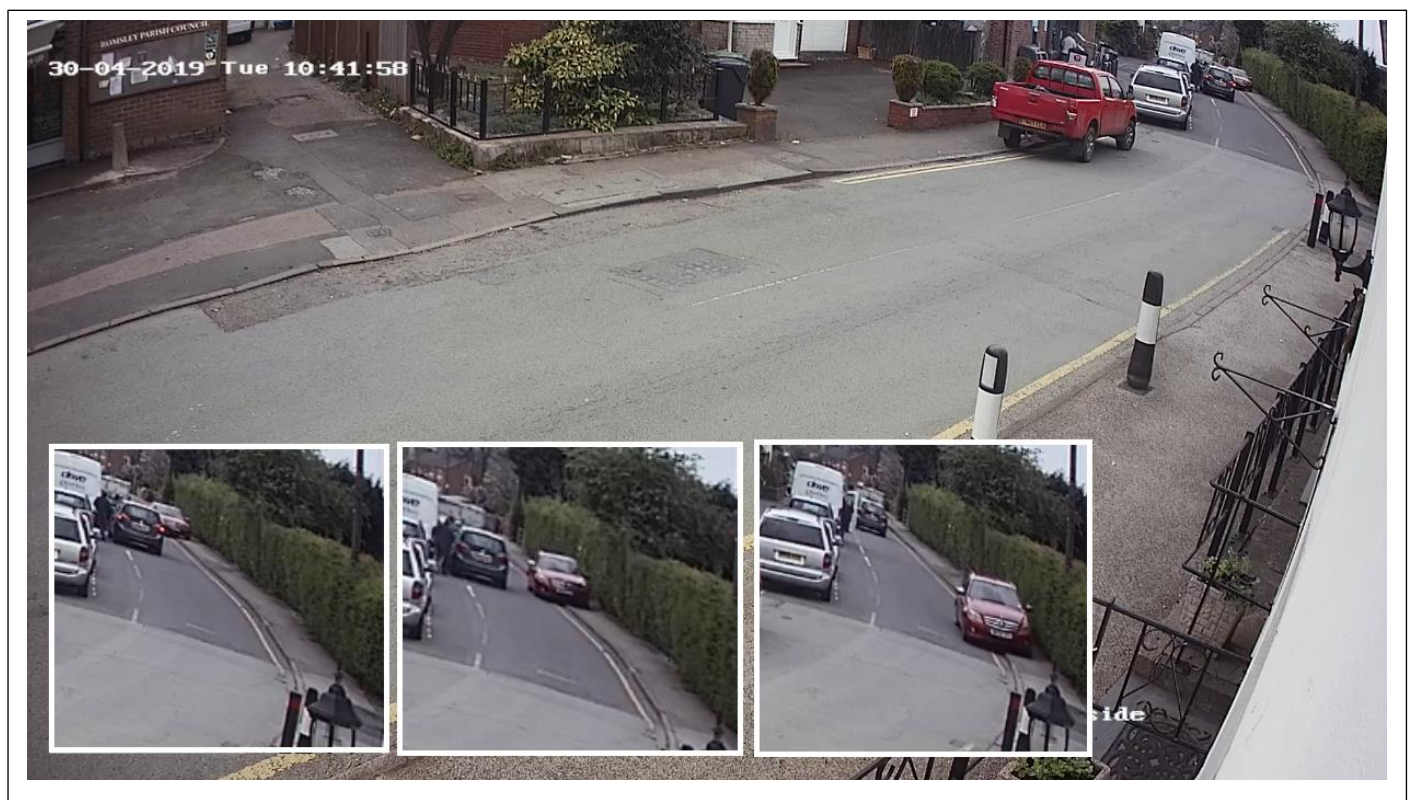
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Batch 2 Sunday 28th April 2019 – A car mounts and drives along the full length of the pedestrian footway at speed to avoid congestion.



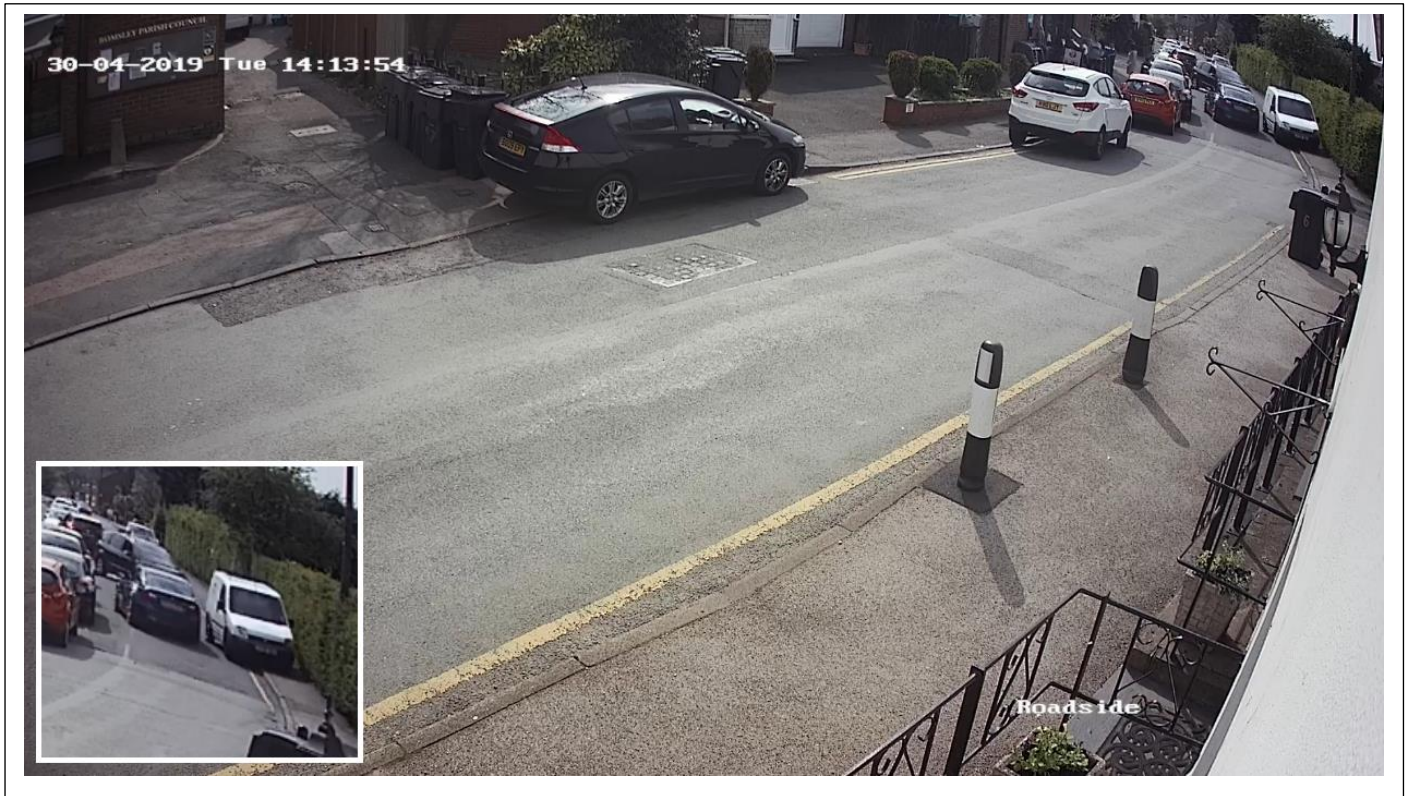
Batch 2 Tuesday 30th April 2019 – A car mounts and drives along the full length of the pedestrian footway at speed to avoid congestion.



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Batch 2 Tuesday 30th April 2019 – A light goods vehicle mounts and drives along the full length of the pedestrian footway to avoid congestion.



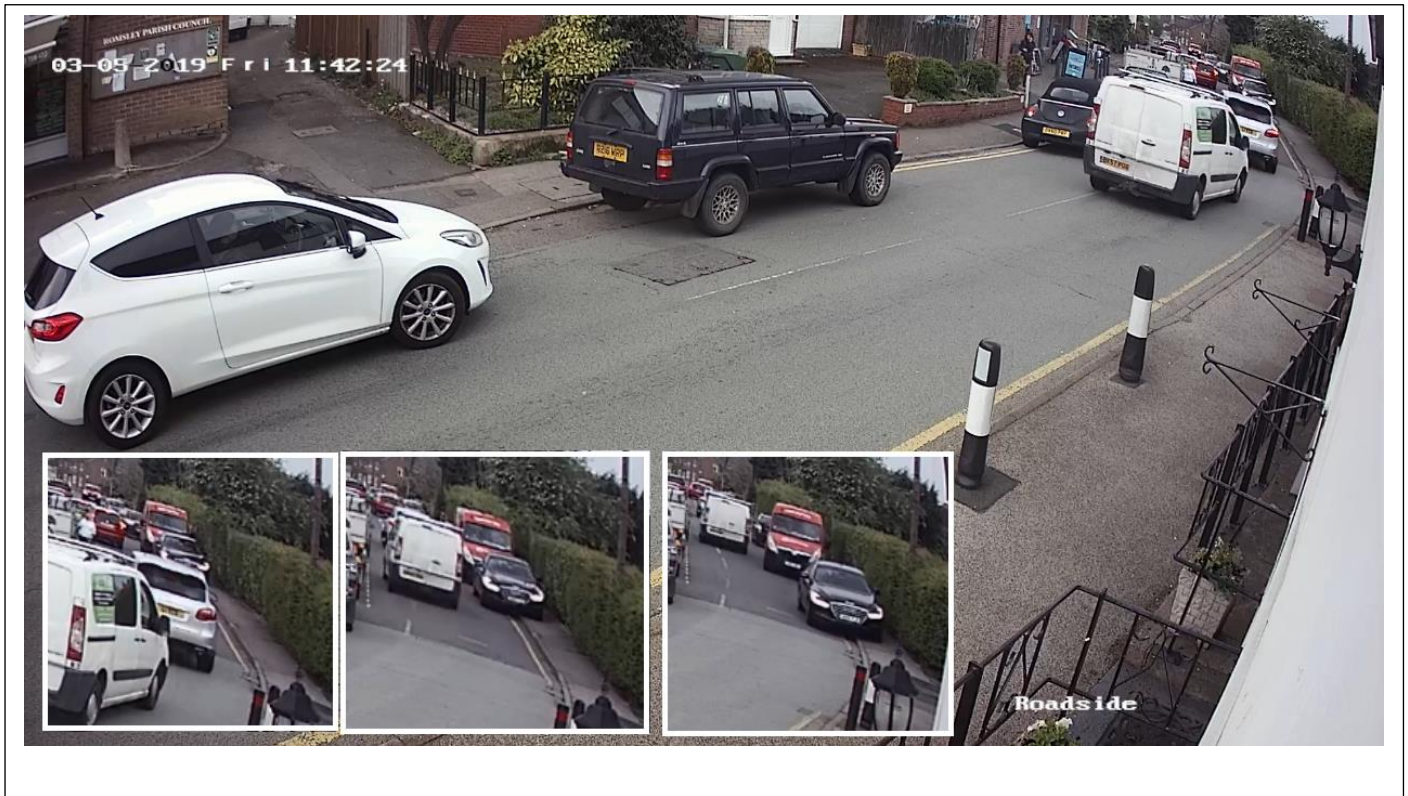
Batch 2 Wednesday 1st May 2019 – A Heavy Goods Vehicle mounts the kerb whilst manoeuvring.



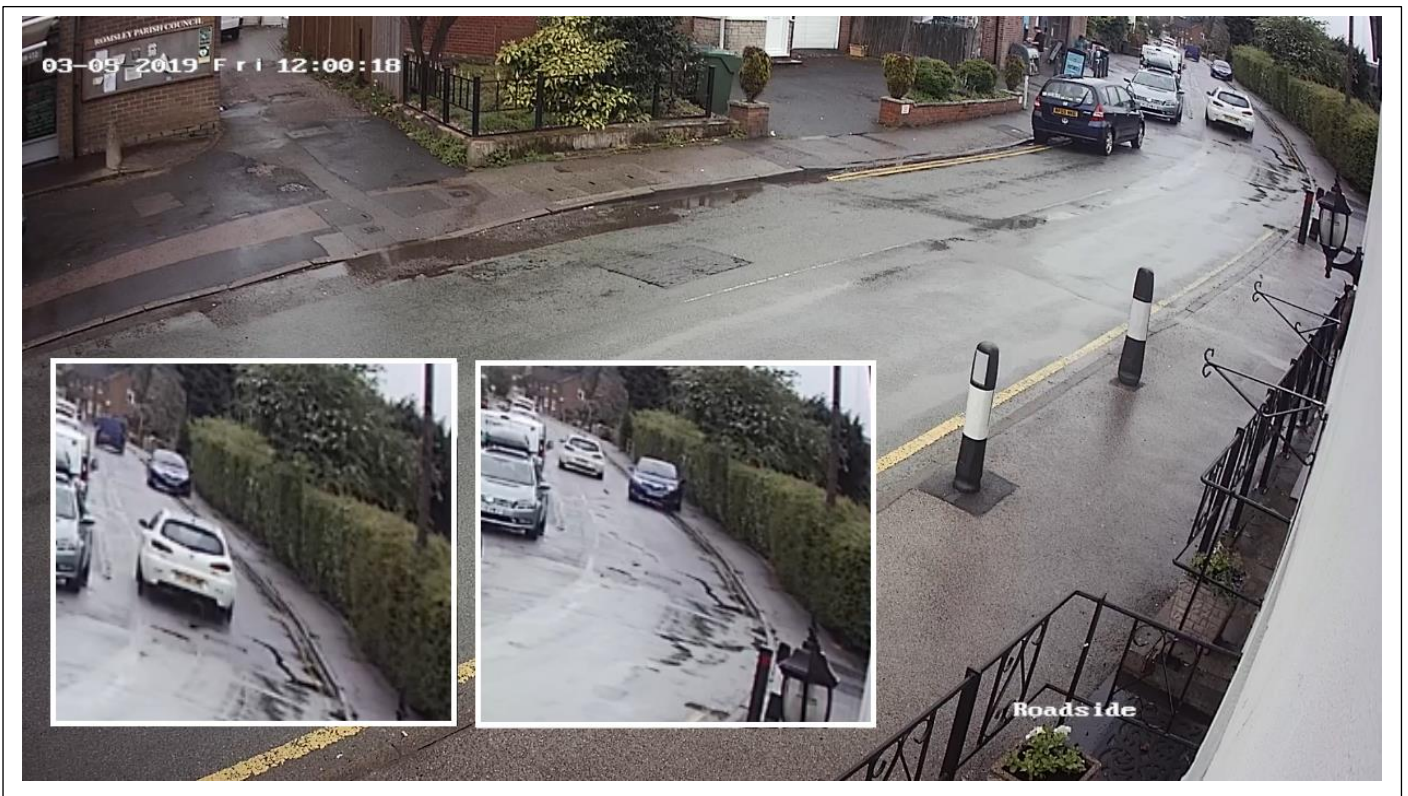
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Batch 2 Friday 3rd May 2019 – A car and Light Goods Vehicle (LGV) mounts and drives along the full length of the pedestrian footway to avoid congestion.



Batch 2 Friday 3rd May 2019 – A car mounts and drives along the full length of the pedestrian footway at speed.



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Annexe 3 – Freedom of information request - December 2018

www.romsleyparishcouncil.gov.uk



Romsley Parish Council
167 Bromsgrove Road
Worcestershire, B62 0JU
romsleyparish@btinternet.com

3rd December 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

Romsley Parish Council has submitted the following Freedom of Information (FOI) request to Worcestershire County Council Highways Department regarding Planning application 18/00282/FUL (Amended) – Yew Tree Farm, Romsley.

Romsley Parish Council is requesting details on the information used by Worcestershire County Council Highways Department, to support their response to the planning development 18/00282/FUL (Bromsgrove District Council Reference) for 7 houses on Yew Tree farm, St Kenelm's road, Romsley, Worcestershire.

Specifically, we require;

1. *Details of all the surveys, assessments and site visits associated with traffic safety, traffic congestion or traffic monitoring that have been undertaken by Worcestershire CC Highways Department or its agents, since November 2015. These details should include;*
 - a) *The type and specific purpose of the survey, assessment or visit.*
 - b) *The name(s), role(s) and qualification(s) of those undertaking and / or overseeing the survey(s), assessment(s) or visit(s).*
 - c) *The date(s) of the survey(s), assessment(s) or visit(s).*
 - d) *The arrival time, leaving time and duration of the activity.*
 - e) *The specific data collection point(s) on St Kenelm's Rd.*
 - f) *The type and volume of information obtained.*
 - g) *All documentation (including handwritten notes, video & images, maps, diagrams, reports, spreadsheets and documents) generated through the survey(s), assessment(s) or visit(s).*
2. *Copies of all internal and external correspondence (including copies of any attachments) and copies of any prepared documentation that deals with the traffic safety or traffic congestion associated to, or referenced in, this planning application.*
3. *Copies of all internal and external correspondence (including copies of any attachments) and copies of any documentation that deals with the Unilateral Undertaking that has been agreed between Worcestershire CC Highways Department and the developer for this planning application, Kendrick Homes. (This must include any solution optioneering, scheme design, cost calculations, delivery schedules and any assessments of value, safety benefits and sustainability.)*

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