

# Highways and Transportation Review: Proposed Residential Development, Waterloo Road, Bid- upon-Avon

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## 1. Introduction

The Transportation Consultancy (ttc) have been appointed by Bidford-on-Avon Parish Council (BAPC) to undertake a review of the submitted Transport Statement, prepared by consultants 'Banners Gate Highways and Transportation', in support of a planning application (Ref. 19/00731/FUL) for a proposed residential development, situated on corner of Waterloo Road and Wellington Road in Bidford-on-Avon, Warwickshire.

This review has considered the content of the following:

- The planning history for the site and for surrounding applications linked with the site
- Transport Statement
- The consultee responses issued by the Local Highway Authority (LHA), Warwickshire County Council (WCC).

## 2. Planning History

The application site is situated within the vicinity of the Waterloo Park Industrial Estate to the north-east of the village and was formerly occupied by an industrial unit. This unit was demolished circa 10 years ago, and the site has been cleared for any future development, albeit with hardstanding areas.

An outline planning application on the site (Ref. 15/00212/OUT) for *'the erection of a 1685 sq.m (gross internal floor area) retail unit (A1) and 743 sq.m (gross external floor area) of business units (B2/B8) with associated infrastructure'* was submitted on the 26<sup>th</sup> January 2015 and subsequently approved on the 20<sup>th</sup> January 2016.

With reference to the committee report, BAPC were supportive of the development and the outcome of the planning application process established several benefits of the approved scheme, which included:

- Provision of a full-service grocery store, complementing the current top up food offer for the local community, which would reduce shopping patterns to Stratford-on-Avon and elsewhere;
- Improved choice in relation to the grocery offer in the village, supporting its status as a Main Rural Centre, without any significant impact of the vitality or viability of the village centre;
- Highway safety improvement measures, which included a new pedestrian crossing on Waterloo Road;
- New B2/B8 business units that would attract new start up business or SMEs (Small and Medium Enterprises) to the village; and
- Provision of circa 79 FTE (Full Time Equivalent) retail jobs and 21 in the new business units within the village, contributing to a sustainable and balanced local community.

The committee report also noted that the:

*'Trade diversion on the edge of centre Budgens as a result of the development is unlikely to be significantly adverse and the third-party objections received do not provide any legitimate planning justification as to why the application should be resisted. The comments made are purely to protect existing business interests and would restrict local choice and the benefits of competition to local residents that the new store would bring;*

*The Council's own retail consultants have confirmed that there are no sequentially preferable sites which are both suitable and available for the proposed development, that the edge of centre Budgens store does not act as an anchor to the village centre and that the proposal will ensure the vitality and viability of Bidford village centre is maintained.'*

The approved planning application subsequently expired on the 20<sup>th</sup> January 2019

With regards to the existing Budgens Store, it has been noted that an application (Ref. 12/02085/FUL) to expand the store was submitted on the 5<sup>th</sup> September 2012, approved on 31<sup>st</sup> December 2012 and subsequently expired on the 31<sup>st</sup> October 2015. The owners of the store, Warners Retail Limited, objected to the application for the proposed food store, and either by coincidence or as a direct result of the decision to approve the food store, the existing Budgens store was not extended.

In addition to the above, the application site is also cited within the appeal decision for the Miller Homes site (Ref. 14/03027/OUT), situated to the north of the village. The development is comprised of 200 dwellings, with access taken from Waterloo Road to the north of the application site. The appeal was submitted on the 1<sup>st</sup> November 2014 and subsequently approved on the 17<sup>th</sup> March 2015. In the inspector's decision, Para 114 states:

*'Planning permission has been granted for a supermarket in very close proximity to the appeal site. It is not clear who might develop and operate the site, but given the commercial opportunity it provides, it would appear likely to occur. In addition to the industrial estate on Waterloo Road, the proposal would be near to other shops, services and job opportunities in Bidford-on-Avon being designated as an MRC within LPR Policy STR.1 and identified as a proposed MRC in the eCS.'*

The provision of a supermarket on the site was referenced by the inspector in response to the Council's concerns that the site could not be classed as a 'walkable neighbourhood' and as a result, the loss of this site as a potential food retail opportunity reduces the accessibility of the appeal site. Further consideration of this issue is given in **Section 3**.

### 3. Transport Statement

The submitted Transport Statement was prepared by consultants 'Banners Gate Highways and Transportation', with the latest iteration of the report being version 3. The Transport Statement notes within the introduction that the impact of the development on the highway network has not been quantified, but instead refers to information provided on the following:

- Local Plan Policy and sustainable development
- Commentary on traffic from previous uses for employment
- Traffic generation and potential impact of the residential development
- Details of highway safety
- Commentary on retail development on the site
- Commentary on the design of access points to the new residential layout
- Commentary on the proposed infrastructure, parking provision and servicing

- Sustainability credentials of the site

The review of the submitted Transport Statement has been prepared in accordance with the chapter titles of the aforementioned and summarised within **Table 3.1**. Only sections with the TS where commentary is warranted have been selected. The table includes a ‘RAG’ assessment (Red, Amber, Green) to categorise whether the item raised is contentious or warrants further action, with the following definitions applied:

- **Green** – no technical issues and/or policy compliant
- **Amber** – potential issue, which could warrant further action, but is not a material concern
- **Red** – significant issue that is a material concern

**Table 3.1 Review of submitted Transport Statement**

Chapter Title	Subsection	Comment	RAG
2. Existing Conditions	2.2 Highway safety on the road	<p>Accident data has been extracted from ‘crashmap’ and not provided by the County Council. Whilst use of the latter has become more generally accepted, the data is out of date and insufficient information is provided on causation. As such, the commentary on causation is conjecture and without merit.</p> <p>It would be recommended that a revised PIA assessment be undertaken using up-to-date data provided by the County Council.</p>	Amber
3. Planning Policy	3.1 Stratford upon Avon Core Strategy	<p>Extracts from the Bidford-on-Avon Neighbourhood Plan has been referenced and used to justify why a retail development of the site should not be pursued. The Neighbourhood Plan Policy referenced, Policy ECON2 – Protecting and Enhancing the Village Centre has been referenced, which in turn corresponds with the sentiments included within Stratford-on-Avon Core Strategy, Policy AS.3 Bidford-on-Avon, which again references the focus of retail development within the village centre.</p>	Green
	3.3 Sustainable development	<p>The Transport Statement presents an assessment of the site’s sustainability and includes details of the suggested acceptable walking distances to ‘town centres’, for ‘commuting/schools and sightseeing’ and travelling ‘elsewhere’, which have been extracted from the Institute of Highways and Transportation publication ‘Guidelines for Providing Journeys on Foot’, with preferred maximums of 800m, 2,000m and 1,200m respectively.</p> <p>The Transport Statement states the following:</p> <ul style="list-style-type: none"> <li>● The school is 800m from the site</li> <li>● The village centre is 950m from the site</li> <li>● The food store (Budgens) is 1,250m from the site</li> </ul> <p>It is clearly evident that the village centre and the food store are in excess of the preferred maximum walking distances and as a result, there is a far higher potential for future occupants of the site to access these services and facilities by private car than by sustainable means.</p> <p>The Transport Statement seeks to justify these distances as being ‘reasonable’ and makes reference to the fact that the neighbouring Miller Homes site (referenced within Section 2) is sited further from the village centre and the food store than the proposed application site.</p> <p>Firstly, there is little evidence or justification for stating that the distances to the village centre and the nearest food store are ‘reasonable’. In accordance with the guidance contained within ‘Guidelines for Providing Journeys on Foot’, an 800m journey by foot is the equivalent of a 9.5-minute walk (based on a walk speed of 1.4m/s). Conversely, the journey time to the nearest food store from the site is therefore 14.9 minutes, resulting in a circa 30-minute return journey compared with the ‘desirable maximum’ of circa 20 minutes. This journey time is therefore not considered to be reasonable and future occupants are unlikely to access the food store by foot.</p> <p>Secondly and with reference to Section 2 of this report, the Transport Statement notes that the Miller Homes site is situated further away from the village centre and food store, however, at the time of the Miller Homes appeal, the proposed site was identified as having</p>	Amber

Chapter Title	Subsection	Comment	RAG
		<p>permission for a food store and was specifically cited within the Inspectors decision as being a benefit to supporting the Miller Homes development as a 'walkable neighbourhood'.</p> <p>As a result, the proposals cannot be considered to be within a 'reasonable' walking distance of the village centre and crucially, the nearest food store. In addition, the proposals for a residential development in place of food retail, undermine the sustainability of an approved development, which through no fault of its own will become less sustainable and therefore contrary to <u>Para 92 of the National Planning Policy Framework</u>.</p> <p>Finally, it should also be acknowledged that either by coincidence or as a direct result of the decision to approve a food store on the site, the existing Budgens store was not extended. As a result of these circumstances, the village is expected to accommodate more residential development without the benefit of improved services and facilities.</p>	Yellow
4. The Development Proposals	4.1 Site layout	<p>The TS states that a carriageway of 5.5m wide will be provided with 2.0m footways along both sides of the estate road.</p> <p>There are no general arrangement plans setting out key dimensions, no confirmation of junction radii and no reference to internal swept path analysis, demonstrating that all parking bays provided are accessible. Given this is a full application, we would expect this level of detail to be submitted.</p> <p>Furthermore, there are two private driveways situated within circa 10m of the access, which does not allow for sufficient forward visibility for vehicles entering the site, or adequate visibility for vehicles exiting the private drives. Since one of the private drives serves four parking bays with no internal turning area, there is a potential for vehicles to be reversing out into the carriageway or from the carriageway, creating conflict and a potential highway safety issue.</p>	Red
	4.2 Parking provision	<p>The section on parking provision has cited the standards contained within the Stratford-on-Avon 'Car and Cycle Parking Standards' Supplementary Planning Document (SPD) from 2007 and also guidance included under Para 105 of the National Planning Policy Framework, which notes (amongst other aspects) that parking should be based on the type of development and car ownership levels. Subsequently, the TS has reverted away from the prescribed standards and undertaken a bespoke assessment based on local car ownership levels.</p> <p>It should be noted that the SPD referenced, was superseded in July 2019 by the Development Requirements SPD and since the TS is dated August 2019, these standards should have been referenced. However, the approach presented is still supported by the standards and is therefore deemed to be acceptable.</p>	
5. Traffic Movements and Transport Planning	5.2 Traffic generation of the residential development	<p>The traffic generation potential of the site has been determined using the TRICS database for 'Affordable/Local Authority Houses', which have been refined to accord with the site location characteristics. A comparative exercise of the trip rates has been undertaken, which resulted in comparable trip rates being determined and therefore those referenced within the TS are considered appropriate.</p>	Green
	5.3 Commentary on traffic impact	<p>This section of the TS reviews the likely distribution of traffic generated during the peak hours. Whilst the approach is lacking in any detail or justification, the impact of the development on the local highway network is likely to be negligible and therefore the lack of detail is unlikely to be consequential.</p>	
	5.4 Access with a refuse wagon and manoeuvring	<p>Swept Path Analysis has been conducted for the internal estate road and demonstrates that the vehicle can enter and turn in a forward gear.</p> <p>The swept path analysis fails to show a vehicle exiting the site and also only shows the simplest manoeuvre into the site, with no evidence that this is the most likely manoeuvre.</p> <p>Notwithstanding this point, the access design is comparable to Copenhagen Way to the south and therefore is likely to be fully serviceable.</p>	
	5.5 Consideration of visibility	<p>The TS sets out the visibility standards prescribed within Manual for Streets and states that the requirements for a 30mph road should be considered.</p> <p>It is standard practice to confirm visibility requirements via a vehicle speed survey, which has not been undertaken. However, the TS references the presence of traffic calming on</p>	

Chapter Title	Subsection	Comment	RAG
		Waterloo Road and given the proximity of the roundabout to the north, it is unlikely vehicles would be travelling above the stated speed limit. As a result, the proposed levels of visibility are considered to be acceptable.	

## 4. Consultation Response

The LHA has provided three consultation responses in relation to this application. A summary of the responses is provided in the following subsection, alongside commentary on whether the observations/comments made have been adequately addressed within the latest TS.

### 4.1 WCC Consultation July 2019

**Table 4.1** sets out a summary of the LHA response from July 2019, alongside a comment on whether it has been adequately addressed within the TS and a suggested action. A RAG assessment has also been undertaken to categorise the severity/urgency of the action.

**Table 4.1 Consultation Response Summary: WCC July 2019**

WCC Consultation Response Summary	Comment	Action	RAG
1. The site was identified as a potential food store and would provide a local centre to the benefit of the surrounding residential development. Its promotion as a residential development would lead all development in the surrounding area to be car dominated to access such services.	This concern is warranted and it has been clearly established within the TS that the site is not situated within walking distance of the village centre or the nearest food store.	Suitability of the site for residential development should be queried. Confirmation from the Local Planning Authority should be sought.	
2. Insufficient information has been provided, notably on sustainable transport.	Agreed and noted, the TS provides limited information on sustainable accessibility and simply seeks to compare itself with neighbouring sites, which in turn are now less sustainable as a result of the proposals.  There are no detailed walking and cycling audits i.e. no plans identifying routes or crossing locations, which should be provided.	A full audit of walking and cycling accessibility should be included within the TS.	
3 (a). Site access drawing with visibility splays	Provided	No action	
3 (b). Vehicle tracking for Mercedes Econic 4 – axle Mid-Steer refuse collection vehicle and fire tender	Swept Path Analysis has been conducted but it is not clear whether the refuse vehicle complies with the model stated. Furthermore, swept path analysis for a fire tender has not been provided.	Confirm the SPA for the refuse collection vehicle is correct. Provide SPA for a fire tender.	
3 (c). Provision of a Road Safety Audit	Provided	No action	
4 (a). Confirmation of the design speed	Not referenced within the TS	Provide this information	

WCC Consultation Response Summary	Comment	Action	RAG
4 (b). Access to a private drive and main access should have a minimum separation distance of 15m	This has not been demonstrated and is considered to be fundamental	Amend site layout	
4 (c). No more than six dwellings to be access off a private drive.	Demonstrated	No action	
4 (d). parking shown to be on the tangents of the turning head, with a requirement to use the footway to turn	This appears to have been addressed	No action	

## 4.2 WCC Consultation November 2019

In November 2019, WCC provided a further consultation response, stating that the applicant had failed to address the points raised in the July 2019 consultation response.

## 4.3 WCC Consultation February 2020

In February 2020, WCC confirmed acceptance of the proposals, but objected based on the swept path analysis showing an incorrect refuse collection vehicle.

## 5. Summary

It is noted that a number of items realised within the July 2019 consultation response and subsequently the November 2019 response we're not addressed by the applicant. The Transport Statement has not been updated since August 2019 and yet the consultation response for February 2020 states that there are no reasons to object other than the requirement to update the swept path analysis for the correct refuse collection vehicle, which incidentally has not been completed.

It is therefore considered that there are several outstanding items that the applicant should address before a decision on the application can be made, namely:

- PIA data should be updated to ensure there are underlying highway safety issues that the development is expected to exacerbate
- The sustainability of the site is questionable, simply being located adjacent to an hourly bus service is unlikely to reduce reliance on the private car, especially given the village centre and nearest food store are beyond the preferable maximum walking distance. Simply noting that a nearby development is further away is not justification, especially since the site in question was previously used to justify that this development constitutes a 'walkable neighbourhood' as a result of having a proposed food store within easy walking distance. A full audit of the walking and cycling environment should be undertaken, including the identification of crossing opportunities, so that any improvements can be identified.
- A general arrangement drawing outlining the key junction geometry should be provided.
- The County Council have previously stated that private drives should be situated a minimum of 15m from the main access. This has not been actioned and should be actioned as a matter of urgency to ensure the safe operation of the development.

- Swept Path Analysis for the Mercedes Econic 4 – axle Mid-Steer refuse collection vehicle and fire tender should be undertaken.

**Issued by**

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