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Date: 14<sup>th</sup> March 2024  
Your ref: 23/01711/OUT

Dear Lee

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

**PROPOSAL:** Outline planning permission for up to 55 dwellings (with means of access to the site be considered at this stage and all other matters reserved)  
**LOCATION:** Land At (OS 7500 5952), Berrow Green Road, Martley  
**APPLICANT:** Hayfield Homes

Worcestershire County Council (WCC), acting in its role as Highway Authority, has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals and the additional information that has been submitted, 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 this application be **deferred**.

The justification for this decision is provided below. Items highlighted in **bold text** are matters that need further evidence and justification before the Highway Authority will be able to make a definitive response to the application.

**Context**

The application site, with a developable area of 3.86 hectares, is located within the village of Martley, to the west of the B4197 Berrow Green Road. Martley is a large village in Worcestershire, approximately 11km north-west of Worcester and 15km west of Droitwich Spa. The application site is bound to the east by the B4197 Berrow Green Road, to the south-east by residential dwellings, to the south by Martley Countryside Burial Ground, to the west by undeveloped land and to the north by a residential dwelling and an unnamed highway. The application site benefits from an existing access, in the form of a vehicle crossover from the B4197 Berrow Green Road, in the north-eastern corner of the site.

The Applicant seeks outline planning consent for a residential development of up to 55 dwellings. Only the principle of development and access are to be considered, with all other aspects reserved for future consideration.

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### **Vehicular Access Strategy**

The vehicle access to the proposed residential development would be from the B4197 Berrow Green Road. An existing vehicle access from the unnamed highway running along the site's northern boundary would be retained and improved with a bound surface to serve the existing allotments.

The B4197 Berrow Green Road is a two-way single carriageway, approximately 5.5m – 6m wide, that runs in a broadly north to south alignment, along the eastern boundary of the site. Approximately 50m north of the application site's northern boundary, Berrow Green Road briefly aligns east to west. At its northern extent, it forms the southern major arm of a priority junction, with the B4204 as the north-west major arm and the B4197 as the north minor arm. The B4197 continues north for approximately 5.7km to the A443 Worcester Road in Great Witley. To the south, the B4197 forms the minor arm of a priority junction with the A413, approximately 4.7km south of the application site.

The submitted Transport Statement (TS), prepared by Rappor and dated November 2023, states the site will be served by a new vehicular access, in the form of a simple priority junction. The TS states the new access would have a 5.5m carriageway, 6.0m radius kerbs and a 2.0m wide footway on the south sides of the road. Within the TS appendices, Drawing No. 230520-RAP-XX-XX-DR-TP-3201/P01 shows the proposed site access junction, as described above. The drawing also shows a short new section of footway to be provided on the west side of Berrow Green Road, running south from the new junction, with an uncontrolled dropped kerb pedestrian crossing, with tactile paving, to assist pedestrians cross the main highway at this location.

The Highway Authority notes the above vehicle access strategy and has no objection to the principle of a new vehicle access at this location, subject to an acceptable layout being provided, with the junction meeting minimum visibility splay and stopping sight distance provision.

However, the Highway Authority notes the proposed junction layout, as shown on Drawing No. 230520-RAP-XX-XX-DR-TP-3201/P01 is not the same layout as shown on the submitted Link Engineering Drg. No. BGM-LE-GEN-XX-DR-CE-001 'Proposed Site Plan', which shows the north side of the access road provided with a short section of 2.0m wide footway at its mouth, running a short distance into the site and a short distance northward on the west side of Berrow Green Road. A second uncontrolled pedestrian crossing over the main highway is also proposed. ***The two drawings provide conflicting layouts and clarification is required from the Applicant as to which is being proposed for the access strategy.***

Notwithstanding the above, given most pedestrians generated by the development would walk to and from the north into the centre of Martley, the Highway Authority is of the opinion the Link Engineering layout is the more appropriate one. It is sensible to have two crossing points, as pedestrians may walk to the north or south. In addition, the north footway shall be extended into the site to provide pedestrian access to those dwellings on the west side of the access road, thereby avoiding the need for pedestrians to cross the carriageway if just the south footway were provided. ***The access arrangement drawing needs to be amended to show these changes.***

The TS notes that, in the vicinity of the proposed site access, Berrow Green Road is subject to a 40mph speed limit., Adjacent to the proposed site access location, there is an existing gateway feature with road markings indicating a change in speed limit from 40mph to 30mph. However, accompanying signage indicates a 40mph speed limit in both

directions. As part of the development proposals, it is proposed the 40mph speed limit would be relocated south of the proposed site access, with the speed limit to the north into Martley being reduced to 30mph. It is proposed that the existing speed limit signage, as well as the existing gateway feature will be removed. A new gateway feature is proposed at the relocated change in speed limit.

With regard to the village gateway feature, the Highway Authority agrees this shall be relocated to the south, away from the proposed new junction. However, the Highway Authority is not convinced there is a need for the speed limit to be altered. As noted within the TS, the 30/40mph change was previously at the existing gateway location but the 30mph location was subsequently changed some years ago, being moved closer into the village. Whilst there might be some benefit in changing the location again, it is not clear if that would result in any significant reduction in vehicle speeds to comply with the speed limit. Hence, it is not considered necessary to move the 30mph to where the TS suggests. It should be noted the Highway Authority did not request such a relocation for the Lioncourt residential development.

The TS advises an Automatic Traffic Count (ATC) survey was undertaken at the gateway adjacent to the proposed site access, between Saturday 19 and Friday 25 August 2023. Based on this ATC survey, the TS reports Berrow Green Road had an average weekday speed of 35.4mph northbound and 31.4mph southbound, respectively, with an 85<sup>th</sup> percentile speed of 40.7mph northbound and 35.4mph southbound, respectively. The Highway Authority notes the results of the ATC, in relation to the 85<sup>th</sup> percentile speeds, which are used to calculate appropriate visibility splays for the new access. The TS states these values require visibility splays of 2.4m x 57.8m to the north and 2.4m by 81.4m to the south, which are shown on Drawing No. 230520-RAP-XX-XX-DR-TP-3202/P01 within the TS. The Highway Authority notes the proposed visibility splay dimensions and agrees that they are appropriate for the new site access.

The TS discusses swept path analysis for the proposed site access junction, with a number of drawings included within the TS showing the analysis for different vehicle types. Whilst the analysis is generally acceptable, the Highway Authority does have a concern with the shown intervisibility splays with different vehicles. These splays appear to include sections of the existing boundary hedge to either side of the proposed access. The Applicant is requested to clarify if the affected sections of hedging will be removed or reduced in height, in order to provide the safe intervisibility splays. ***Alterations to the hedge shall be shown on a revised site access arrangement drawing.***

The ATC also recorded traffic flows on Berrow Green Road. The Highway Authority would comment that August is usually not considered a suitable neutral month for such traffic surveys, given it is during summer school holidays. ***Depending on the purpose of the recorded data, the Highway Authority requires clarification if the recorded traffic flows can be deemed acceptable for any technical analysis.***

The west side verge of Berrow Green Road has an existing drainage ditch and the development drainage strategy advises highway surface water would outfall into this ditch. As the proposed access road will cross over the existing drainage ditch, the Applicant is required to clarify if it will need to be culverted. If so, as the access is prospectively adoptable as a public highway, such a culvert would be considered to be a structure and, therefore, require a full structural design and check. ***The Applicant is requested to clarify if a culvert is required.***

### **Pedestrian Access Strategy**

In terms of pedestrian access, the TS advises there are three links proposed as part of the scheme:-

- A new 2m wide footway will be incorporated onto the southern side of the vehicular access from Berrow Green Road. It is also proposed that PRow 698(C) will be diverted to this access point;
- A shared surface connection to the north-west corner of the site, connecting to the unnamed road that borders the site to the north, to provide connectivity to PRow 694(B) and the existing allotments; and
- A pedestrian connection in the south-west corner of the site on the existing alignment of PRow 698(C).

As mentioned, as part of the vehicle access strategy, the Highway Authority is of the opinion the main internal access road should also have a 2.0m footway on its north side, from the junction to the proposed housing on the west side of this access road. It is also desirable to have two pedestrian crossing points on Berrow Green Road, either side of the new access. These crossing points take pedestrians onto the existing east footway on Berrow Green Road. Given the potential increase in pedestrian movements, the Highway Authority considers it desirable and appropriate for this existing footway to be widened from the south crossing point to the Memorial Hall. It is desirable to provide a 2.0m footway but this may not be possible due to the existing boundary hedge. ***The Applicant shall submit a suitable drawing that shows this improvement.***

It is not clear how PRow 698(C) on the Berrow Green Road west verge would be diverted to the proposed site access. Is it intended to provide a new section of 2.0m footway on the west side of Berrow Green Road, from the existing site access to the new development site access? ***The Applicant shall clarify this point and provide a suitable drawing to show the proposal.***

The Highway Authority supports the proposal to provide a pedestrian access to the north-west corner of the site. The Highway Authority also supports a pedestrian connection in the south-west corner of the site on the existing alignment of PRow 698(C).

With regard to PRow 698(C), this currently runs in a diagonal direction from east to west through the proposed site. Various supporting documents state it will be diverted in places, to suit the proposed housing layout, but also surfaced. The Highway Authority notes this aspect will be covered by an appropriate Reserved Matters application. However, the Highway Authority would suggest it is better if the diverted PRow were to follow the alignment of new footpaths to the north and west of the site, with a shared 3.0m wide facility provided. This would mean users of the PRow would generally avoid having to interact with motorised vehicles within the site.

### **S278 Agreement**

As delivery of the development would require some off-site changes to the public highway network, the Applicant would be required to enter into a separate S278 Agreement with the Highway Authority, if planning consent were subsequently granted. For the S278 Agreement, detailed designs of improvements would need to be agreed, with the Applicant paying the processing and checking fees.

All improvements to the public highway are subject to the Road Safety Audit (RSA) process with a Stage 1 RSA required to be undertaken and approved during the planning

stage. ***The TS includes a Stage 1 RSA Brief, which is generally acceptable to the Highway Authority, but it is noted Section 2 text relates to another scheme, which needs to be amended. Drawings will need to be updated for the Auditors to include all highway improvement measures deemed appropriate for the proposal.***

### **Principle of Development**

In terms of considering if the principle of development is acceptable to the Highway Authority, consideration needs to be given to (i) if the site is deemed to be a sustainable location, (ii) what impact it would have on the local highway network, in terms of capacity and (iii) what impact it would have, in terms of highway safety.

#### *Road Collision Data*

The Applicant obtained Personal Injury Collision (PIC) data from WCC for the five-year period up to July 2023 and focused on the study area comprising Berrow Green Road along the site frontage to its junction with Mortlake Drive to the north and its junction with the Maylite Trading Estate access to the south. The data shows there were no recorded PICs during the period. The TS concludes the analysis has demonstrated that the PIC record does not give rise to any significant concerns nor demonstrate any discernible pattern or trends which could require further study or mitigation.

The Highway Authority accepts this conclusion. Whilst the introduction of a new priority junction would result in the risk of potential collisions occurring, a junction designed to standard helps minimise such risk. The Highway Authority is of the opinion the proposed development would be unlikely to result in any significant detrimental impact on highway safety. Hence, there is no reason to justify any recommendation of refusal on highway safety grounds alone.

#### *Traffic Generation*

The TS notes there have recently been two planning applications within the vicinity of the site that have been granted planning consent and that the Highway Authority agreed trip generation for both sites. The most recent application was the Lioncourt development to the south-east of the application site. Given its trip generation assessment was undertaken recently, has been approved by the Highway Authority and granted planning consent at Planning Committee, the TS considers it suitable to utilise the same trip rates to forecast trip generation for the application site.

The Lioncourt development undertook a TRICS assessment based on Privately Owned Houses, this is a robust assessment for the proposed development, given that a proportion of the dwellings will be affordable. Using the Lioncourt data, the TS estimates the 55 units would generate 29 two-way vehicle trips in the AM peak hour and 25 two-way vehicle trips in the PM peak hour.

The TS then discusses trip distribution, stating the forecast residential development traffic has been distributed across the highway network based on 2011 Census Origin/Destination Travel to Work data, using MSOA area – Malvern Hills 002. It is estimated 87% of traffic will head north along Berrow Green Road, with 13% heading south. For the northbound traffic, 37% is estimated to continue north on the B4197, with 50% turning east on to the B4202.

The TS states that, given the low volume of vehicles generated by the development and distribution of trips onto the local highway network, the development proposals will not result in a significant impact on any particular link. On this basis, no further junction assessments are required. The Highway Authority agrees with this conclusion.

### *Cumulative Impact*

The TS advises a cumulative trip impact assessment has been undertaken at the key local highway links to take account of the cumulative impact of the proposed development and the approved Lioncourt Development and Jessup Development. The TS concludes the three developments could generate 97 two-way vehicle trips in the AM peak hour and 87 two-way vehicle trips in the PM peak hour.

The TS also considers trip distribution of the cumulative impact of all three developments, estimating AM and PM peak hour trips on the local network. The Highway Authority notes the suggested cumulative trip distribution but would question if the values shown in Table 7.4 are correct, as some values seem on the high side and do not match the suggested trip generation values. Whilst it would be desirable for the Applicant to clarify or correct the values, the Highway Authority is of the opinion the cumulative impact can still be accommodated onto the local highway network without causing any significant detrimental impact on highway operation or congestion. Whilst it is unclear if the network baseline traffic flows are reflective of most neutral months, as a result of the ATC being undertaken in August during the school holidays, thereby missing some school-related trips, the Highway Authority is generally satisfied the local highway network has relatively low existing baseline flows. This means that, whilst impact of development traffic is high in terms of percentage increases, the cumulative trips can still be accommodated on to the local highway links and junctions without causing any significant detrimental impact to the capacity or operation of the local highway network.

The Highway Authority accepts the TS conclusion that no computer junction modelling is required and there is no justification to consider recommending refusal of the application on the grounds of highway operation or capacity.

### *Sustainable Travel*

Martley is classed as a Category 1 settlement by the Local Planning Authority and the application site benefits from being in proximity to some services, amenities and facilities that are predominantly located to the east of the site generally within the centre of the village. The TS sets out distances to a number of local facilities. There is a convenience store and post office within approximately 620m of the middle of the site, which is well within the recommended 800m value. Both a primary school and a secondary school are within 1.1km of the site, with generally acceptable walking routes available. There is a part-time GP surgery, two employment estates, a pub and other leisure facilities. Hence, residents will be able to viably access a range of local facilities from the development site on foot.

In the vicinity of the development site, there is an existing footway on the east side of Berrow Green Road, which is approximately 1.0-1.2m wide. The footway runs north into the middle of Martley, connecting to other footways in the village, which does not have street lighting. The existing Berrow Green Road footway also connects to the existing footway provision on Ryecroft Way, providing an alternative pedestrian route into the rest of Martley. There is also a network of public rights of way in the surrounding area, providing walking routes to the village, surrounding rural areas and leisure routes throughout the countryside.

As mentioned previously, the Highway Authority is of the opinion residents of the proposed development would benefit from a section of existing footway, on the east side of Berrow Green Road, being widened.

The surrounding highway network within Martley is subject to a 30mph speed limit and does not carry high traffic volumes, making it suitable for use by cyclists with a range of abilities and experience. Hence, it is possible some residents might choose to cycle to local facilities. Some residents may opt to cycle further but such trips are likely to be more for leisure.

The nearest bus stops are "The Crown Inn" bus stops, located on the B4197 Berrow Green Road, to the north of Central Stores, approximately 690m from the centre of the site. The northbound bus stop comprises of a simple flag and pole whilst the southbound bus stop is equipped with a wooden shelter, bus timetable and community noticeboard. The bus stops are served by the 308, 309, 310, 420, and S310 bus routes, with destinations including Worcester, Clifton upon Teme, and Great Witley. Whilst the Highway Authority notes the walking distance is more than the desirable maximum 400m distance, it is accepted many users are prepared to walk longer distances to bus stops in rural locations, up to 800m being deemed acceptable. The Highway Authority is of the opinion the available bus service provision is reasonable for a village location and that residents would have the opportunity to use buses, rather than the private car, for some trips.

Under the 1985 Transport Act, WCC has a duty to consider the transport needs of elderly and disabled residents. A service must be provided for all elderly and disabled residents where no suitable bus service exists for those unable to access a bus due to disability. WCC analyses this using historic trip need, DfT mileage rates and census data (for population per dwelling, disabled population statistics and age 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, if planning consent were subsequently granted for the development, WCC would request a contribution of £12,474.00 towards community transport for this site.

In terms of School Transport, the site is in the Primary School catchment for Martley CofE Primary, located 0.6 miles away. The route is acceptable so no contributions will be sought. The site is also in the Secondary School catchment for The Chantry, located within a suitable walking distance and route. Hence, no contributions will be sought for home to school transport for the site.

Whilst the overall range of local facilities might be considered limited, particularly in relation to local employment opportunities and healthcare provision, the Highway Authority accepts some daily services can be accessed by sustainable modes of transport. Although the development is still likely to be predominantly car-based, it is accepted residents do have the choice of realistic travel options for some trips. On this basis, it would be difficult to justify a recommendation of refusal on sustainability grounds alone. It is also the case, the Highway Authority accepted both the approved Lioncourt development and Jessup development could be considered as being sufficiently sustainable locations, hence a precedent has already been set for the village.

Considering the above comments, the Highway Authority is minded to accept the principle of development.

### **Site Layout**

Whilst the application form suggests the intention is for the majority of the internal access roads to be put forward for adoption as prospective public highways, this has not been clearly stated. Whilst the application is for outline consent only at this time, with all

matters, except access, to be reserved, an indicative Masterplan layout has been submitted (Drawing No. P22-1974\_DE\_001\_C\_02), together with a proposed site.

The TS states the illustrative Masterplan demonstrates a layout consisting of 'primary residential streets' or 'shared surface streets, courtyards and mews' in line with the WCC Streetscape Design Guide (SDG) document, which might suggest an intention to put internal roads forward for adoption. However, the Highway Authority is of the opinion the indicative layout, as currently suggested, would not be suitable for adoption. ***The Applicant is requested to clarify adoption intentions.***

The Highway Authority notes the submitted drainage strategy suggests the internal access roads surface water drainage would be collected via piped system that flows into an attenuation pond and then discharges into the existing drainage ditch on the west side of Berrow Green Road. This would imply the road surface water system would be private, as the Highway Authority would not adopt such a system and it is unclear if the Water Company would also be prepared to adopt such a system. The Applicant is advised the Highway Authority would be unlikely to adopt any roads that have private apparatus within them.

### **Travel Plan**

The Applicant has submitted a draft Residential Travel Plan (TP), prepared by Rappor and dated November 2023. The TP has been reviewed with reference to the WCC Guidelines for producing Residential Travel Plans and the WCC SDG. The Highway Authority would make the following comments.

#### *Modal Shift Targets*

The objectives and targets set out in the TP are welcomed by the Highway Authority. Section 4.14 of the TP states that the *"Interim targets have been set based on an indicative 15% reduction in trips made by a car driver, as determined by 2011 Census travel to work data for the 'Malvern Hills 002' Middle Super Output Area, taken from NOMIS Census data"*.

This target is in line with the 'Guidelines for producing Residential Travel Plans' document, which states, *"DfT guidance such as Making Residential Travel Plans work advocate that a good travel plan can reduce commuter car usage between 11% and 21%. The single occupancy vehicle target within this travel plan must aim to match this figure."*

However, Table 4.1 of the TP provides the percentage modal split interim targets stating a reduction in Car (Driver) mode usage from 85.9% (census split) to 77.3% in Year 5, resulting in a reduction of 8.6%. This is not in line with Section 4.14 and does not meet the criteria set out in the WCC Guidelines. It should also be ensured that the reduction in percentage of single occupancy car users is balanced by proportionate increases in use of other feasible sustainable modes. ***Hence, it is suggested that the modal split targets in Table 4.1 are reviewed and recalculated for all modes.***

Additionally, the site location and accessibility to nearby facilities should be considered when deciding upon the targets to ensure targets are realistic and the appropriate travel planning measures are in place and are aligned with the increases in sustainable modes.

#### *Travel Plan Measures*

The measures proposed in the TP are welcomed by the Highway Authority. However, as mentioned above, travel planning measures should be clearly thought out and in line with

the modal shift targets to ensure these can be achieved within the set timeframe. **Further measures should be included within the TP and some suggestions are provided:-**

- Bus taster tickets in addition to seasonal tickets would give residents the opportunity to try the bus service in the area;
- Promotion of cycle user groups and bicycle maintenance training/workshops; and
- Promotion of a car sharer club within the development and the facilitation of trip matching by the Travel Plan Coordinator, in addition to promotion of Liftshare.

#### *Implementation Plan*

Section 7.10 of the TP states the implementation plan covers the lifetime of the Plan, which is stated as five years. While it is generally expected that all TP targets will be achieved in the five years, it should be noted that the 'Guidelines for producing Residential Travel Plans' document state "*Travel Plan surveys need to be undertaken at regular, agreed intervals from first occupation until it is agreed by the Local Authority that monitoring is no longer required.*" **Hence, this should be noted in the TP.**

Should planning consent subsequently be granted, an updated TP would be a recommended planning condition. In addition, the Applicant would be required to prepare Travel Welcome Packs for potential residents, with the Pack being approved by the Highway Authority prior to issue.

#### **Conclusion**

The Highway Authority has undertaken a robust assessment of the planning application. Based on the analysis of the information submitted, the Highway Authority concludes that there remain a number of access design concerns that require further consideration. The Highway Authority, therefore, submits a response recommending **deferral** until further supporting information is provided.

Yours sincerely

**Karen Hanchett**

Transport Planning and Development Management Team Leader