

# **NORTH WORCESTERSHIRE GOLF COURSE PUBLIC INQUIRY**

## **Statement by Richard Burden MP**

1.0. My remarks will not focus on Birmingham City Council's case for rejecting Bloor Homes' appeal. As you know, the appeal by Bloor sought to overturn the Council precluding redevelopment of the North Worcestershire Golf Course site as outlined in the Birmingham Development Plan and which was endorsed by Roger Clews as Planning Inspector in 2016.

1.1. Instead I will try to address 3 issues which are of great concern to residents.

1.2. The first of those and one on which concentrate most of my remarks are the implications of Bloor's plans for traffic congestion in area.

1.3. After saying something about that issue, I will then comment briefly on concerns that have been raised with me in relation to flood risk and on the extent to which local people have been consulted about the future of the site and how I hope they can be better involved from now on, whether or not this appeal is upheld.

## **2.0 TRAFFIC CONGESTION**

2.1. When he reviewed the Birmingham Development Plan in 2016, Planning Inspector Roger Clews remarked that as there had been no detailed analysis of the impact of an 800-house development on the local road network or on local residential amenity, the allocation of the NWGC site for development "*would not be justified.*"

2.2. Bloor's representative will no doubt argue that such a detailed analysis has now been undertaken and that their modelling suggests that the road network in the area will be able to cope if the development goes ahead.

2.3. I beg to differ. There is already severe congestion on Frankley Beeches Road and Tessall Lane, the two local roads from which access to Bloor's new housing estate is envisaged, particularly during peak-times in the morning and evening. This is likely to be made considerably worse if the development goes ahead.

## **2.4 Frankley Beeches Road**

2.4.1. For some years now, a great deal of traffic from residential estates in the Rubery and Frankley areas of Longbridge and further south uses Rubery Lane and then Frankley Beeches Road as a main route into Northfield and then onwards towards Birmingham in the morning. It is also a main route going in the opposite direction in the evening. In both cases, commuters use the route to avoid the main A38 at Longbridge.

2.4.2. One of the main pinch points on that route is the existing mini roundabout at the junction of Frankley Beeches Road and Egghill Lane.

2.4.3. The officers' report considered by Birmingham City Council's Planning Committee when it rejected Bloor's outline planning application on 31 August 2017

suggested that although this junction was assessed to be operating within capacity so far, one of the 3 arms to the junction would be approaching capacity by 2026 simply as a result of “*background growth*,” – in other words, even without development of the North Worcestershire Golf Course site.

2.4.4. The fact that Bloor propose a fourth arm from that roundabout to give access to and from the new housing estates they wish to build, would, in my view, only make congestion there worse.

2.4.5. As far as I can see, there is nothing in Bloor’s plans that would increase capacity on the road if and when the junction snarls up.

2.4.6. Already queues regularly back up along Frankley Beeches Road at the end of day for traffic going south, and they back up well down Rubery Lane for traffic going north into town at the start of the day.

## **2.5 Frankley Beeches Road Junction with the A38**

2.5.1. Go further down Frankley Beeches road towards Northfield town centre and you reach the junction of Frankley Beeches Road with the main A38 Bristol Road South. – a junction which was analysed in the report which went to Planning Committee in August 2017 as likely to soon be operating “*at capacity*” in the morning and evening peak periods even without the development of the NWGC site.

2.5.2. That report to the City Council’s Planning Committee went on to say that the addition of traffic generated by the proposed development would make this situation worse, with the junction operating with a “*degree of saturation exceeding 90% in both directions.*”

2.5.3. In reply, Bloor would doubtless say that City Council traffic engineers have told them that these problems can be mitigated by changing the traffic light sequence on the junction of Bristol Road South and Frankley Beeches Road.

2.5.4. That junction is already a 4 way one with additional pedestrian filters and another pedestrian crossing and another junction around 50 yards further on.

2.5.5. I have been trying to get City Engineers to look at phasing of lights to address the queuing already takes place there. Despite the regular traffic jams there, however, they have told me that they consider the junction to be operating as it should.

2.5.6. As City Council engineers appear to seriously believe that junction is already operating as it should, I would take a lot of convincing about the reliability of their assurances that rephasing of the lights will provide adequate mitigation if the extra traffic generated from redevelopment of NWGC takes the junction over capacity with over *90% saturation in both directions* as those same engineers expect.

## **2.6. Tessall Lane/A38 Junction**

2.6.1. I would now like to turn to the other road from which access to proposed new Housing estate is envisaged by Bloor - Tessall Lane.

2.6.2. If you go there now, particularly at peak times, you will see long queues at Tessall Lane's junction with A38 – the main south west road in and out of Birmingham.

2.6.3. Analysis provided by Birmingham City Council's Transportation Engineers to the Planning Committee which considered Bloor's application in August 2017 said that this junction is already "*approaching capacity*".

2.6.4. That report refers to two possible scenarios for how traffic will develop from now on and it goes on to say that in both assessment scenarios, the A38 Tessall Lane junction will be operating over capacity in the future, even without the proposed development of the NWGC site.

2.6.5. The conclusion drawn in that report is that the impact of the proposed development of NWGC would require measures to be taken to mitigate this additional impact.

2.6.6. As far as I can see, however, Bloor's suggested mitigation consists solely of (quoting from the same report):

*"A third lane would be provided on Tessall Lane northern arm approaching the junction to accommodate right turning movements."*

2.6.7. Given that Tessall Lane is already a dual carriageway with its two carriageways on different levels, I am not sure how and where either Bloor or City Council officers believe they can fit in a third lane at this junction.

2.6.8. So I am sceptical about how far the mitigation proposed by Bloor will actually mitigate very much in practice.

## **2.7. Emergency Vehicle Response Times**

2.7.1. The additional congestion that the development is likely to cause on local roads would leave me unconvinced about the sustainability of the proposed development even if all we are talking about is commuter traffic.

2.7.2. In reality, however, the impact will go further than that:

2.7.3. Just down road from the NWGC site is a major Ambulance Hub station on Hollymoor Way. According to figures provided to me by West Midlands Ambulance Service (WMAS), there are currently around 105 ambulance movements out of hub every day.

2.7.4. Two of the main roads that ambulances use when responding to emergency callouts from the hub are those I have been talking about so far: Frankley Beeches Road and Tessall Lane.

2.7.5. When Bloor's proposals were put before the City Council's Planning Committee, it seems WMAS missed their significance and they did not respond to the consultation.

2.7.6. However, I provided WMAS with a link to the plans myself and they have now provided me with comments which I have supplied to you.

2.7.7. Their warning is clear when they say:

*“Clearly, traffic congestion caused by a development such as this is both in its build stage and when completed is an issue that would impact on our ability to respond out to emergency calls. Although our vehicles are fitted with blue lights and sirens, additional congestion will inevitably slow down our response to incidents, though it would be difficult to quantify that. I have noted there is no plan to improve the current highways in the area other than a pedestrian crossing and an upgrade to the junction at Bristol Road A38.”*

2.7.8. This, of course, is without the additional callouts that are likely to be generated by a housing development of kind of size envisaged by Bloor. WMAS estimate there will be around 362 additional incidents year to which Hollymoor ambulance station will have to respond.

2.8. Put all of this together, I do not believe the increase in congestion which the development would generate is sustainable. Indeed, the impact on the Ambulance Hub is likely to increase emergency response times which, at worst, could put lives at risk.

2.9. Before concluding my remarks, I would like to briefly touch on two other issues:

### **3.0. FLOOD RISK**

3.1. North Worcestershire Golf Course sits on high ground overlooking an existing residential area.

3.2. The open land has always provided a giant soakaway that protects residents on lower ground from flooding.

3.3. From my conversations with residents, I know I am not alone in being worried about whether the proposed redevelopment would represent a flood risk to those properties below the NWGC site.

3.4. The 2017 Planning Committee report into Bloor’s 950 home application last year noted:

*“The Environment Agency - Objects to the proposed development, on the grounds that whilst the site seems to have a ‘low’ probability of flooding their flood maps do not show the risk of flooding from minor watercourses with a catchment area of less than 3km<sup>2</sup>. The true extent of flooding on site is therefore unknown.*

*The submitted Flood Risk Assessment (FRA) flood model (including the technical report and model log) should be submitted to the Environment Agency for review. The applicant should also confirm that the 1 in 20 year flood extents have been determined (reference is only made in the FRA to the 1 in 30 year event) and that the latest climate change allowances have been used.”*

3.5. A further report to Planning Committee in respect of revised 800 home proposal this year said:

*“The reserved matters applications would need to consider further details including Sustainable Drainage.”*

3.6. I am aware that the Inquiry was told on Tuesday, the Environment Agency have now withdrawn their objection in principle to the development of the NWGC site.

3.7. If I understood what was being said correctly, however, they still require the Reserved Matters application to address Sustainable Drainage issues as was reported to the City Council’s Planning Committee in July of this year.

3.8. I am aware that Bloor take the view that any flood risk is adequately addressed by their plans.

3.9. I am not a drainage engineer so I do not claim to be able to definitively comment on that.

3.10. I simply say that my understanding is that the Environment Agency still require sustainable drainage issues to be carefully scrutinised and, to me that remains important with due weight being given to the precautionary principle.

3.11. My constituency is one of those that in recent years has been hit several times by an intensity of rainfall previously been assumed to be once in 50 years occurrences. But the heavy rains happened and too many of my constituents suffered the effect of floods less than a mile away from the NWGC site as a result.

3.12. I do not want residents who live in estates surrounding NWGC site to have a similar experience and I hope Bloor will be closely questioned on how robust their sustainable drainage plans for site actually are.

#### **4.0 INVOLVING LOCAL RESIDENTS AND THEIR REPRESENTATIVES**

4.1. The last point I would like to make concerns the quality of consultation that has taken place over Bloor’s plans.

4.2. Bloor has, over past few years, conducted a number of roadshows about their plans.

4.3. Feedback I have had from residents, however, is that these have felt more promotional rather consultative in character. There is real dissatisfaction amongst residents about that.

4.4. It is against that background that concerns were expressed to you on Tuesday about how far the letter sent out by Bloor announcing a scaling down of their proposal from 950 dwellings to 800 amounted to a serious attempt by Bloor to consult.

4.5. My concern about the limited opportunity which people living in area have had to have a say over what happens to the NWGC site is not, however, confined to what Bloor have or have not done.

4.6. I would have hoped that the Golf Club themselves, as owners of the site, might have talked to the local community and elected representatives about options for the future of site if and when they decided they wished to dispose of it. They did not do so.

4.7. I also have to say that Birmingham City Council itself has been pretty minimalist in its approach to involving residents or local representatives.

4.8. The reason I am drawing this to your attention is that on Tuesday there was some discussion about the extent to which Bloor and the City Council have engaged with each other over the kind of contribution it would be reasonable for Bloor to make to the local community – whether by means of a Section 106 agreement or unilateral undertakings.

4.9. Ultimately, the legal agreements involved here are properly a matter for detailed negotiation between Bloor and the City Council.

4.10. What those legal agreements relate to – whether schools for local children, community facilities, the management of public open space or the provision of playing fields – are, however, matters of broader community interest on which I would have hoped the City Council would have tried to engage local people well before things get to stage of legal agreements with Bloor as developers.

4.11. The fact that the City Council has not even attempted to do this is regrettable and I think symptomatic of a narrow and dated approach to place-making.

4.12. Local people deserve better. I hope the appeal is unsuccessful for reasons I have outlined. However, if the Secretary of State decides that development should go ahead, I do hope there will also be a recommendation that both the City Council and Bloor should be far more proactive in involving local people in the shape of what happens, including identification of the kind of community benefits local people would wish to see coming from this development.

## **5.0 CONCLUSIONS**

5.1. In conclusion therefore:

5.2. My assessment of the likely impact of this development on traffic congestion on the roads surrounding the NWGC site leads me to believe that Bloor's Plans are not sustainable.

5.3. In 2016, the Planning Inspector observed that in the absence of detailed analysis of the impact on local roads, redevelopment “*would not be justified.*”

5.4. It will be for you to judge whether a sufficiently detailed analysis of the impact on local roads has yet been undertaken.

5.5. Either way on that, however, from what we do know, I would argue that there is still no reason to change the 2016 conclusion that allocation of the site for development of the kind envisaged by Bloor would not be justified.

5.6. I also have concerns about whether sufficient attention has yet been given to the flood risk from a development of this magnitude on high ground.

5.7. Finally, you have heard concerns that Bloor’s engagement with the local community over recent years has been more promotional than consultative.

5.8. Nothing can change what has or has not happened so far. Whether or not the Secretary of State approves or rejects this appeal, however, I think it would be reasonable to expect the future of this site to be approached in a spirit of much greater partnership with local people than we have seen from the Golf Club as the existing owners of the site, from Bloor as the Club’s preferred developers, or from Birmingham City Council itself.