DORRIDGE & DISTRICT RESIDENTS ASSOCIATION

ESTABLISHED 1961

www.dorridge.org.uk planning@dorridge.org.uk

5 Bushwood Drive
Dorridge
SOLIHULL
B93 8JL

Tel: 01564 770813

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Dear Sir

2009/1746 – Redevelopment of Forest Court, Dorridge by Sainsbury's.

The Residents Association's formal response to the development is represented by this letter. In summary:

- The car parking analysis is flawed and fails to demonstrate that there is proper capacity for the needs of the development.
- The redistribution of traffic will cause inconvenience to motorists and increased danger to pedestrians and cyclists.
- Insufficient regard had been given to the nuisance to neighbouring properties.

The current proposal appears to have some fundamental problems that must be resolved before it would be appropriate for SMBC to permit redevelopment by Sainsbury's.

General Position

The Residents Association accept the principle of redevelopment of Forest Court.

We have heard the strong representations from residents both for and against the current development and as such we find it inappropriate to either support or reject the current proposal as a whole. We have encouraged residents to make their own comments, and the fact that we do not echo those issues should not be taken as an opinion on the validity of those views.

We have not expressed a view on the architecture of the building. However, we are sympathetic to the opinions expressed that insufficient attention has been paid to the rear aspect, which is for many people going to be the main view of the development, and as has been noted in some objections, is in danger of sharing the same "service area" aspect as the current Forest Court development.

CAR PARKING

The Current Situation

Currently, the car park to the rear of Forest Court (hereafter "the car park") not only services Forest Court, but also the surgery and the rest of the village centre. It provides parking for shoppers in some 50 spaces, plus further spaces for servicing (including those reserved for the doctors' surgery; for shopkeepers in Forest Court; and for shopkeepers, residents and delivery access to Station Approach).

At certain times during the day, this car park is full for customer use, though some areas marked as "No Parking" still have space available. No formal analysis of car park usage has been made though, for example, it is not uncommon for the public element of the car park to be full during main surgery hours.

The car park is located near the major commuter rail station of Dorridge. This attracts substantial car parking from both local and distant drivers – the small rail car park is **typically full** by early morning, and the paid for commuter car park behind the Total Garage has been **fully occupied** especially from Mondays to Thursdays. This has been established by personal observation of members of the DDRA and also by interview with the Chiltern Car Park attendants. Aside from the car parks, the station has generated considerable on street parking which caused significant nuisance due to the nature of the surrounding roads and is being resolved by increasing parking restrictions.

Arden Buildings has a small, sub-standard car park which has a steady turnover but is **typically full** and often has queuing traffic trying to access it. It is insufficient to service the demands of the local shops, which are typically service establishments (dentists, opticians, hairdressers, nail bars) requiring lengthy visits as well as the drop in visits to Tesco Express. There is insufficient parking at the rear for people working in the shops who cannot use the public parking spaces and deliveries are made on-street on Station Road.

Station Approach has a small amount of one hour parking. During lunchtime and evening, this is often full.

Forest Road has a single side of unrestricted parking. It is a de facto long stay station car park and there are rarely any spaces freed up during the day.

There are few other appropriate places for on-street parking.

The access to the site is on a bus route which accesses the Station Terminus via Forest Road and Avenue Road.

Current Dorridge Parking Analysis

At the moment, a portion of Dorridge residents walk or cycle into the village centre, yet the car park still is in significant demand.

The TA (Table 6.5) assumes that there are only two generators for demand in the car park and presumes that the main trip rate of around 70 visits per hour is due to Forest Court itself having discounted the surgery trips.

There has been no formal analysis of where the car park users go. If we consider Friday evening, it is unlikely that users are going to Forest Court except to the pharmacy. There are a number of drop off trips to the music school but they tend not to park. There are very few other customers in Forest Court after 5pm. However, it is easy to identify that there are a number of shops outside Forest Court that do create parking demand, including the chip shop, the various outlets in Arden Buildings and Station Approach.

This is important because at this point there is no obvious alternative parking.

The car park is currently operated by SMBC for the benefit of the whole of the village centre, therefore, **the new development must demonstrate that it can provide car parking usage for this level of demand**, and indeed, an **increased** level of demand if we accept the argument that the Sainsbury's development will revitalise the village centre.

TA Parking Analysis

The car parking analysis is primarily sourced from the TRICS database.

We have looked at the use of the TRICS database as described in the TA and the subsequent addendum and find that the applicants do not have confidence in the site selection being representative. Further, there is then an assumption that the Dorridge site is so different from the selected sites that it is safe to reduce the demand by 20%. The applicants have had to use out of date data to come up with a site selection that they still believe does not adequately reflect the situation in Dorridge, and a review on Google Earth would tend to confirm this view. The TRICS data is clearly not an appropriate model for the store, yet they have chosen to entirely depend on this model for car parking and have not sought other sources of data to validate this.

The problem for the car parking analysis is that TRICS synthesises car parking demand by accumulating trip rates for the model. Inbuilt to this statistical model is a presumption of length of stay which is implicitly modelled by the distribution of the trip rates. While it may be reasonable to adjust traffic demand by an amount for trip rates in a general sense, **it is not possible to divine the relationship of the modelled parking accumulation to the actual parking accumulation from the TRICS database in this complex scenario**.

To exacerbate the issue, the car parking analysis is based on the Sainsbury's TRICS demand only, and **no additional demand has been considered**.

As a simple example to explain this issue, consider the proposition that a trip to the surgery is a linked trip and can therefore be discounted from the trip rate analysis. We can agree that there will not be an extra pair of trips, so that the traffic flow is not impacted. However, let us say that the shopping trip was to be 30 minutes and the visit to the doctor took 15 minutes (10 minutes wait for a 5 minute consultation) which resulted in a visit to the pharmacy (say 15 minutes either waiting or visiting twice and doing the shopping in between). Only the 30 minutes is represented in the TRICS data – the car parking space will be occupied for an extra 30 minutes. **The actual car park would have an increased occupancy, even though there were no additional trips**.

Consider now the more difficult case of linked visits between Arden Buildings and Sainsbury's. If we accept that people will visit Sainsbury's from Arden Buildings, then the length of stay in the Arden Buildings car park will extend for the duration of the Sainsbury's visit and reduce the actual number of people who can use that car park. The displaced visitors will be forced to use the only alternative parking – Sainsbury's. Similarly, those who are included in the Sainsbury's TRICS demand but go to Arden Buildings do not increase trip rates around Dorridge, but they do change the parking accumulation.

Similarly, the TA references passer-by trip rates. We agree that these can be discounted for traffic flow around the site, but they clearly cannot be used to discount parking time, so a perception that the parking model is more robust would be misplaced.

As a sanity test, it is illogical to rely on a model of car parking that presumes that existing Dorridge village parking **relieves** the load on the car park when the existing situation is that the car park currently **provides** Dorridge village parking.

For these reasons, the use of the TRICS database to model car parking is invalid. The TA assumes the impact on trip rates as having the same effect on parking accumulation.

If we look at the current car park usage, we know that there is a significant usage of the existing car park for Dorridge village. The usage of the car park cannot be justified on the basis of the doctors' demand (which is supposedly discounted in table 6.5 anyhow) and Forest Court demand, therefore a substantial proportion must be for other village access. As there is no intent to restrict parking for non-customer access, this must be accounted for outside of the supposed trip rate demands of the store.

TRICS data is provided for a 7 doctor GP surgery, but this is not is in the development model. The opportunity for lengthier procedures in this revised format of surgery and the provision of a wider range of services generally suggest that the TRICS data is not a reliable model for this type

of surgery, especially considering the age of some of the data. It should be noted that the surgery spaces purely provide parking for some staff, not any patients – a fact that has confused several residents.

Regardless of linked trips, the car parking demand should include some proportion of the existing trip rates for visits exclusively to Dorridge. A figure of 50% of the existing unaccounted for trips does not sound unreasonable, some 35 trips in and 35 out per hour, with a profile suggesting a significant car park occupation time. So this is a demand that needs to be added to the current car parking occupation, rather than discounted.

We also would dispute that the accessible nature of the Dorridge site compared with the sample sites means that the trip rate and parking can be significantly reduced.

We accept that the store is accessible and there is likely to be significant demand being by foot. However, it would be inappropriate to adjust TRICS data by any significant amount as these shoppers will be going elsewhere for the sample sites and so foot arrivals are likely to represent additional visits rather than replacement visits. **We would also note that the likely walking catchment area is very small compared with the total catchment area and to assume a reduction of 20% is simply unrealistic.** Residents living close by suggest that they would expect to use a car for the convenience of transporting the shopping home.

The bus services do not serve the local estates (e.g. Four Ashes), being designed for commuter access to Solihull. While there may be additional opportunistic visits generated, the likelihood of deliberate visits to shop by bus is very small, and the likelihood is that those shoppers would be non-drivers such as the elderly who would not be replace parking.

With regard to the train services, any specific trips from the north would bring in additional demand outside the supposed catchment area, most likely from Widney Manor station (bringing demand from within the MUA to outside, which is inappropriate), and would not reduce demand for car parking. Lapworth (and Hatton?) stations themselves are not highly accessible so it seems unlikely that car users would drive to those stations to take the train, the drive from Lapworth being straightforward. The train service is also limited from Lapworth at a single train per hour.

While it is reasonable to assume that commuters will pop in for some odds and ends on returning home, they are unlikely to perform significant shopping trips without the use of a car to carry the load (we can presume that someone parking in the Total car park would still move their car to Sainsbury's for ease of loading). **It therefore seems inappropriate to make any significant adjustment for train arrivals.**

The substantial nature of the store will work against pedestrian access as the large format makes it inefficient for shoppers to make frequent visits. A small format store can be traversed quickly, and although the range of goods can be limited, visits have the advantage of being straight-forward. While we would support sustainable methods of accessing the store, we

note that Sainsbury's rejected constructive suggestions such as bicycle trolley loans. Without some means of assisting walking and cycling shoppers transporting larger amounts of goods, **a large format store is incompatible with sustainable access.**

We are extremely sceptical on the dependence on a Travel Plan. Regardless of intent, SMBC have no track record at all of being able to agree and implement effective travel plans. We can point to application 2008/867 at Arden School which was granted on specific condition that there must be no Sixth Form parking whatsoever on or off site, yet SMBC have approved a travel plan with no realistic means of enforcing this and the head teacher is on record as complaining about being monitored for compliance. Similarly, at a recent planning Inquiry for the MSA at J4 of the M42, the travel plan for the Blythe Valley Business Park was described as unrealistic, ineffective and unenforceable. We would therefore suggest that no account can be taken of any aspect of the Travel Plan that is not underpinned with realistic enforceable legal or contractual obligations with the affected parties.

I**n conclusion, we cannot accept that the car parking analysis is based on a sound model and further we can see that applying an arbitrary 20% reduction is entirely optimistic and cannot be supported by reasoned analysis.**

Implications of Car Park Modelling Flaws

If we accept the figures provided for the car park analysis but do not accept the 20% reduction then the model provided suggests that the car park is filled for much of the day – see Table 1 below.

On top of the undiscounted demand presented by TRICS, we need to add in other demands. Without being able to quantify the impact, aside from noting it is "negative" the car park analysis does not account for the following:

- Station Approach deliveries,
- Demand of the expanded surgery (whether in trip rate or not),
- Demands caused by existing shops in Dorridge,
- Demands caused by new opportunities within the rest of Dorridge.
- Demands caused by the new retail and cafe facilities within the development,
- Sensitivity tests for the unreliable TRICS model.
- Reduced parking elsewhere due to displaced Station Approach residents and shopkeepers occupying other opportunity parking such as Manor Road.

In the following table, the provided TRICS data has been re-accumulated to arrive at the undiscounted car park accumulation. The TRICS column represents the raw data, and the final column represents the Sainsbury 20% reduction as presented as a cross-check. This calculation also confirms that no demand from the doctors' surgery or new retail outlets have been accounted for in the Sainsbury's figures.

Table 1: Unadjusted TRICS demand for Friday

Friday		**TRICS** 100.00%			**Sainsbury** 80.00%		
		Arrivals	Departs		Arrivals	Departs	
Time		Count	Count	**Accum.**	Count	Count	**Accum.**
6:00	7:00	36	10	**26**	29	8	**21**
07:00	08:00	56	24	**58**	45	19	**47**
08:00	09:00	159	93	**124**	127	75	**99**
09:00	10:00	229	158	**194**	183	127	**155**
10:00	11:00	269	229	**235**	215	183	**188**
11:00	12:00	264	260	**238**	211	208	**190**
12:00	13:00	256	282	**212**	205	225	**170**
13:00	14:00	253	251	**214**	202	201	**171**
14:00	15:00	253	256	**211**	202	205	**169**
15:00	16:00	245	253	**202**	196	203	**162**
16:00	17:00	273	258	**217**	218	207	**173**
17:00	18:00	294	304	**207**	236	243	**166**
18:00	19:00	251	290	**167**	200	232	**134**
19:00	20:00	173	226	**115**	139	181	**92**
20:00	21:00	107	144	**78**	86	115	**62**
21:00	22:00	57	94	**41**	45	75	**33**
22:00	23:00	9	31	**19**	7	25	**15**
23:00	24:00	0	0	**19**	0	0	**15**

You will note that the car park is shown to be saturated from 10am till 6pm. Earlier we suggested that there were an amount of trips to be considered for Dorridge village demand – 35 trips represents some 15% extra on the trip rate per hour.

If we consider the implications of this they are:

- queuing traffic on Avenue Road.
- Patients unable to access the surgery, even for drop off (how would they be identified as different from cars waiting to park?)

- Customers of non-Sainsbury's outlets, often with appointments, unable to access parking.
- Informal on-street parking out of restricted hours on Avenue Road causing obstructions that were deemed to be unsafe from station traffic.
- Potential obstruction to the bus route, hindering public transport.
- Potential obstruction to access for the station.
- Contention between queuing traffic from Station Approach and Forest Road directions.

these impacts is that they do not include impacts on Sainsbury's itself. The Sainsbury's contention is that if they get car parking wrong, it is only they that suffer; however, it is the satellite organisations that would be worst impacted. There are no real opportunities for informal overflow parking, as this is already occupied by the commuter parking.

A simple interpretation of the table is that the demand generated by the store is at least 20% greater than the site has capacity for.

General Points on Parking

No practical method of delivering to Station Approach shops has been considered, and also that shopkeepers and residents of Station Approach are no longer to be able to park in what was a service area for them. This represents another significant number of vehicles that are expected to find some place else to park. There is to be no access from the car park to the rear of the houses, so delivery lorries would be forced to double park on Station Approach as there is often insufficient space for lorries.

There appears to be no practical access for industrial waste bins for Station Approach, which again is currently accessed from the car park.

Traffic Issues

The existing road infrastructure is not designed for heavy traffic, although we understand that many of the journeys represented by this development would have been made somewhere on the network. The majority of the catchment is to the north of Station Road and would tend to head towards the Four Ashes Road and on to Monkspath, or along Widney Road to Solihull. Knowle residents would typically not travel along Station Road through Dorridge to access major shopping centres.

Therefore it is reasonable to assume that the traffic increases from Station Road/Grove Road/Widney Road towards Dorridge will be significant.

The extra weight of traffic is being imposed on a road system that has no features that are sympathetic to cyclists or pedestrians.

There are no safe crossing points along Station Road from the last crossing in Dorridge by Poplar Road up until the Pelican Crossing at Arden School. With a significant increase in traffic, the opportunity for safely crossing two streams of traffic diminishes considerably. The local road network is one that services a primarily residential area, and it is inappropriate for the test to be purely one of absolute carrying capacity – busy roads will change the nature of the Dorridge experience into being urban. Station Road is itself a residential road.

SMBC have no workable strategy for implementing cycle routes in constrained areas such as Dorridge and Bentley Heath. If the development does create inappropriate levels of traffic, there is no capacity locally to improve the road network and some elements are already inadequate for the tasks they are required for, such as the safe passage of pupils to Arden School along the pavements.

Station Road/Grove Road/Widney Road roundabout

Of particular concern is the difficulty of crossing at the Station Road/Grove Road/Widney Road roundabout due to the poor sight-lines around it and the inconsistent approach speeds of traffic. Pedestrians already depend on co-operative drivers for safe crossing. Similarly, cyclists are in conflict with traffic and are exposed to traffic failing to observe them from each direction – an issue that is noted in the TA addendum.

This roundabout is also difficult for drivers to negotiate due to the poor sight lines and inconsistent approach speeds on a small junction. We note the comments in the addendum about reducing traffic flows but in the past traffic demand along Station Road from Knowle has been such that there have been extended queues stretching back to Purnell's Way. T**he roundabout may be particularly sensitive to increased traffic flows that are not represented properly by the software model.**

Station Road/Forest Road junction

It is suggested that it is acceptable for HGVs to cross onto the wrong side of the road to exit the road. Forest Road has a sweeping bend accessing it according to the submitted plans, and also with increasingly heavy traffic, people turning right to access Forest Road may accelerate hard into a gap in traffic. This is not a service road, but a main access road for the station, the buses and the development, so it is not appropriate to have a design that depends on casual road users being exposed to traffic on the wrong side of the road immediately after a junction.

Manor Road/Grange Road/Station Road

The modelling of the road network does not seem to represent the existing poor traffic flow from Grange Road into Dorridge. The road

sequence from Manor Road past the filling station, car park entrance, pedestrian crossing and Station Approach is complex and in the rush hour, traffic flow already struggles. It is hard to see that traffic calming would improve carrying capacity, especially when traffic often has to negotiate the Tesco delivery lorries too.

Forest Road/Avenue Road/Station Approach

The proposals have no indication of any traffic calming plans around the circuit off Station Road to access the store. We would expect the whole circuit to be calmed and enforced to 20mph which also appears to be in line with formative Government policy.

Station Approach onto Station Roundabout

The access onto the roundabout from Station Approach is unsatisfactory. The wall surrounding the garden of the Forest Hotel restricts the pedestrian view of traffic forcing pedestrians to step into the road to see traffic at the marked crossing point, the view of which is further hindered by the slope and parked cars. This is an important access from Dorridge and Bentley Heath to the station.

Secondly, the same poor visibility causes a conflict between traffic coming up the hill and that exiting from Avenue Road. Traffic from Avenue Road is unsighted, yet traffic from Dorridge Road and the station car park is in plain site, encouraging a rapid traversal of the roundabout towards Dorridge Road from Station Approach. Increase in traffic will significantly increase the likelihood of a serious traffic incident.

Station Road in front of the Store

We support the remodelling of Station Road to create an area of open space and a closer link between the two sides of the Dorridge centre.

We note, however, that in providing this, it has in fact enabled Sainsbury's to site a much larger floor area for the store than might otherwise have been permitted which is a considerable financial advantage.

The open space should be in the control of the Council to ensure that informal events could be held without the possibility of Sainsbury's seeking to control potentially competitive activities such as specialist market stalls.

A suitable cafe/coffee bar could be very useful in providing a safe place for people of all ages in the evening and every encouragement should be given to ensuring that this stays open during the evening.

Noise Nuisance

The noise issue for residents of Forest Road has not been addressed to their satisfaction. Whilst the noise reports are technical documents beyond our expertise we do note that the noise reports do not discuss the most important issue, which is that incidental noises are more likely to disturb sleep.

We are extremely disappointed that Sainsbury's should have sought to start deliveries so early in the morning. Sainsbury's cannot avoid disturbing residents on occasion, and the last couple of hours sleep are extremely valuable. It is difficult to get back to sleep when disturbed in the morning therefore **we would expect no deliveries to be allowed, including lorries arriving, until such time as it would be agreed that it is reasonable for most people to wake up which must be at least 7am.**

Sunday Trading

In accepting the redevelopment by a supermarket, we are concerned that the development has been measured against existing weekday activity and there has been little consideration to the significant change in character on a Sunday. We recognise that Sunday Trading is inevitable with such a development, but noise and traffic issues especially need to be considered against the existing Sunday baseline for which there is no consideration in the application.

We especially note that this means that the centre of Dorridge will have a significant change in character. In practical terms this means we would expect the Highways department to review parking restrictions with a view to ensuring that there are no unintended consequences of the change in period of use and we would expect the noise conditions to be firmly applied. We note that is illegal to load and unload on a Sunday before 9am without the consent of the Local Authority and we would not expect such a dispensation to be granted in this case.

There are a number of community events that take place, especially the Dorridge Fun Run, that may be hindered by the 7 day trading. Provision should be made to allow Dorridge to continue to support such activities which may conflict with access to Sainsbury's.

Yours faithfully,

Ian Spencer
Planning Secretary
Dorridge & District Residents Association