

FAO: Ailith Rutt/Ruth Bamford
RBC Planning and Regeneration services

2nd September 2014

Dear Ailith and Ruth

Re: Asda 2014\036\FUL - additional representations for meeting of September 10 2014

Please see below some additional representations/clarifications based on our original letter – submitted to ensure our points are fully represented.

- 1) On the issue of insufficient car parking, we hereby submit evidence to support the very real issue/strong belief that the parking provision will be totally inadequate. The pictures were taken to reflect normal Saturday/Sunday trading and Bank holiday trading. The amount of visitors is also not untypical of other trading days during the week. Further, please see below a snap shot of a 'one off' event at the Mosque (but one which will inevitably recur and have an impact in and around the site). Any assumption by Asda/B&Q that visitors to their stores will not misuse local roads or access roads would represent a complete misunderstanding of the issues and act as proof that Asda have a lack of knowledge/lack of concern pertaining to the proposed location and consequential impact on the local residents. Further, if the stores chooses (as indicated at the planning meeting of August 6th) not to impose minimum onsite parking restrictions that will create an even bigger burden on residential roads, as people will inevitably opt to use an unmonitored free site to park on and walk into town, giving rise to greater footfall and noise in residential streets, not to mention the fact that such unmonitored parking will leave insufficient parking provision for genuine shoppers.



Typical weekend/bank holiday view of the car park – one can see the majority of the car park is utilised.



The permit parking area in Union Street is usually quiet, the event at the Mosque gave rise to use of the streets around the proposed store location, so what is to stop other people using these permit only parking bays and create greater congestion and improper parking on local roads?



Visitors to the Mosque parked around the 'on site' roundabout and on the access roads leading to the proposed store. This is not a criticism of the Mosque users per se and may well alter when the Mosque site is complete – but the issue here is about what is there to stop Asda/B&Q store visitors doing the same, especially with a greater number of possible users on the site. Surely this creates a hazardous and dangerous environment on site as well as inappropriate parking in permit controlled adjoining streets,

- 2) Having re-read the noise assessment report, there is no clear evidence that the site as a 'whole' will not generate significant levels of noise and this will become an obvious major issue for local residents. In fact, the report specifically states they are not able to comment on the impact of the site as a whole, but are only able to comment on individual elements pertinent to the noise tests carried out, some of which cannot even be tested until such time that PPE is placed in situ and in a working environment. We strongly believe that noise measures such as acoustic fencing would need to be fully demonstrated as being effective, we also believe that the impact of all PPE on the site, e.g. compactors, generators, fridges etc be fully reviewed and if this is not independently forthcoming suggest that the application be refused on the basis of inappropriate evidence. Any review would need to be fully reported on and full feedback provided to residents. If the above independent impact review is not forthcoming it will inevitably be seen as a failure of the application/planning process and subject to any right of appeal. If such proposals are implemented without the ability to fully test and assess the whole site, this would likely result in limited right of redress by residents, given Asda's current stance and their apparent unwillingness to engage with all local residents.
- 3) The current operator appears to be unable to operate within its' current opening hours, and as very real examples we have noted operations 'outside of hours' which constitute what we believe to be significant breaches. e.g. operating of the fork lift truck at the front of the building (residential side) before 7am in the morning (weekends), operating the fork lift truck (residential side) circa 11:45 pm (which is way past the store closing time. Therefore what assurances would be provided to residents to ensure that any new operator at the site will not breach any imposed operating conditions e.g. the number of night time deliveries, misuse of fork lift trucks, etc.
- 4) Since the proposed site does not constitute a designated district location, nor is it within the designated town centre location, one must seriously raise questions about the fact that the Jinnah road site has no infrastructure support with regards to security and policing and that any extension of proposals to install further CCTV, facing away from the store and its boundaries could have significant impacts on the local community in relation to 'right to privacy'. Residents have been extremely ill-considered and the Committee should further consider the extent to which a proposed 24 hour site will be unsupervised and unmonitored and therefore will give rise to the very real potential for general disturbance and anti social behaviour in a largely residential area. The provision of CCTV camera monitoring of the underpass leading to and from Lodge Park would be largely ineffective as the footfall is usually coming out of town past the houses on Marsden, Lodge and Millsbro Road.
- 5) There is no evidence to support the need for another 24 hour store in Redditch and certainly not one at such close proximity to local residents. Councillors and the Asda supporters at large would I am sure not want such a development directly on their doorsteps! Of course the only people who will lose if the proposal goes ahead are the local residents themselves.
- 6) The creation of up to 400 jobs has not been fully demonstrated (despite our previous request for information). For the benefit of the public, the Council and the Committee, we would seek to understand exactly how many full time, part time, zero contract hour positions are actually on offer. Further how many jobs and for what period of time will be available for activities directly related to site 'redevelopment'. When compared to other stores of a similar or larger size, the Asda numbers appear high and are possibly unsustainable. The numbers as unlikely to give any regard to the impact of job applicants from other retail outlets in the town stores whose management may be pursuing a policy of downsizing through natural means or would be forced to downsize as a result of the proposal and therefore it could be argued that Asda do not have 400 'new' jobs on offer at all. It is critical that Asda present a transparent and honest view on this regardless of eventual location.
- 7) The concerns in relation to contaminated land and the impact on residents does not appear to have been fully considered/answered to residents satisfaction and it appears that no attempt has been made by the applicant to understand these concerns (i.e. they appear to want to carry on with the proposals regardless). Certainly there have been no assurances provided a) in light of the published reports residents received during 2013/2014 and b) in relation to concerns noted on the Borough Council planning portal. Such comments/concerns have been made by Worcestershire Regulatory Services as included within' consultants' comments' and this does not give enough information to satisfy residents of the health and safety aspect related to site development but just adds to the level of concern. In addition other comments have been made in the public comments section in relation to this matter.
- 8) The proposals for a store located in the Kingfisher centre certainly appears far more appropriate, since:
 - a. A town centre location supports the objectives of National and Local plans (current and emerging).
 - b. There will be greater accessibility to the site (for both employees and visitors alike).
 - c. The Kingfisher location can be more adequately accessed by 'direct' means (train, bus, car) without the need for linked journeys – which will impact workers/visitors and the community in terms of time and effort as well as creating an environmental impact resulting from many linked journeys.
 - d. The benefits in relation to greater potential with respect to linked shopping trips would appear to far outweigh any assumed benefits for the out of town proposal.
 - e. The negative impact on local residents will far outweigh any potential parking charges which may be levied on visitors to the Kingfisher centre.
 - f. The Kingfisher site has the required infrastructure and facilities to cater more adequately for the needs of disabled shoppers – who can access the centre and then further access the shop-mobility scheme.
 - g. The Kingfisher proposal for a new store within the town centre is a proven format and one used by other stores around the country.
 - h. There is no 'new' revenue to be generated from the Jinnah Road site, a newly developed site within the Kingfisher Centre (as proposed by the Town Centre Management, "TCM") should be seen to be of strategic benefit and should be welcomed by Redditch Borough Council.

- i. The TCM is investing millions of pounds into its' redevelopment efforts and this should be 100% backed by the Council, who should be seeking to retain and improve the attractiveness of the town centre for the good of Redditch and the wider community.
 - j. The TCM is willing and able to construct a new store for Asda, on land that the TCM own – thereby conferring no additional setup costs on the applicant. Whilst the time span may be a little longer than desired, that said Asda have already mentioned both 2015 and 2018 as trade commencement dates in their planning considerations, the store build within the Kingfisher should also be welcomed and seen as a beneficial longer term step.
 - k. The Kingfisher site benefits from existing full infrastructure support in respect of security and policing and this should be a key consideration in the decision making process.
- 9) Asda will have seen all representations made against the current proposal (since the submissions are public documents), and on that basis they should surely be pursuing a strategy of Corporate social responsibility. To-date the applicant(s) has categorically failed to acknowledge and respond to any concerns or suggestions made by the local residents and we would therefore question their lack of consideration towards the community, in relation to the store format, access and operating hours being proposed. Further, the clear benefits of the Kingfisher site plan, which has the backing of many people, cannot be ignored or overlooked in the decision making process.
- 10) In the very unfortunate case that permission is granted for the Jinnah road site, we request that all items below be inserted as 'conditions' to the proposal which we would insist must be fulfilled by the applicant(s):
- a. Absolutely no to 24 hour trading/24 sales of alcohol/late night refreshments provision or anything in excess of current trading hours on the site (and no un-notified future change without consultation and approval).
 - b. All store signage should be placed only on the side of the building facing major road access points and not positioned on the sides of the building directly facing residential properties.
 - c. There should be no brand signage positioned at or above roof height.
 - d. Lights should be out by store closing time i.e. 9:30 latest as required by residents.
 - e. Lighting to be of such low voltage so as not to directly be the cause of light pollution on and around residential properties.
 - f. Lighting to be subdued such that it does not attract late night visitors to the site.
 - g. Any provision of CCTV equipment should be placed only on the perimeter boundary of the site, facing into the site.
 - h. The store should employ a CCTV controller who must be a 'proven and competent' individual (holding the relevant qualification).
 - i. Limit of access to the site – that is to say, remove current steps (to the left) and pedestrian access point (far right) and have only one access/exit point (as current at the middle of the site) for visitors on foot, and one access/exit from the island, for visitors by car.
 - j. Provide financial assistance to residents on Lodge/Millsbro road to secure the private access road at the rear of properties – thus helping to alleviate the congregation of groups/gangs of people so as to ensure residents do not suffer damage to property. Indeed the store should ensure that it does not provide an environment in which anti social behaviour can prevail.
 - k. Ensure a litter management scheme run by Asda is implemented and fully operational at all times. This should include all roads/access points leading to the site as well as generally around the site.
 - l. Ensure full support for local parking restrictions by working with the Council to ensure regular patrols are operational and ensuring no misuse of 'permit only parking' provision on residents roads. Ensure all issues raised by residents are dealt with timely and create an environment for direct and timely dialogue with residents.
 - m. Conditional improvements re Noise/visual impact:
 - i. Residents closest to the site and who, for any reason whatsoever, are unreasonably impacted by noise should be compensated against the full cost of enhanced sound proofing to their properties – e.g. triple glazing.
 - ii. Ensure the loading bay area is fully undercover and fully sound proofed (sides and roof) and proven by testing.
 - iii. Tiered natural barriers and full high level site screening is to be erected on all residential facing boundaries to ensure a clear and adequate division between differing land uses (e.g. residential and commercial).

Due to the amount of unknown consequences of this proposed 'cheek by jowl' site we urge the committee to completely refuse the application for a store on the Jinnah road site, and in doing so ensure they vote for the good of the town as a whole, and not in favour of a cheap alternative that will create more harm than good for residents and for many local businesses and shoppers alike. Please ensure the town do this once and ensure the town get it right!

Yours sincerely

Paula D Harvey
OBO Smallwood South Residents