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BY EMAIL ONLY

Dear Mr Palmer,

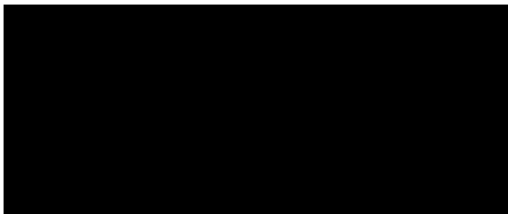
**Solihull Local Plan Review: Regulation 19 Consultation**

Worcestershire County Council (WCC) welcomes the opportunity to comment on the above consultation. We look forward to ongoing engagement with Solihull as a neighbouring authority on cross-border matters, including transport and education infrastructure.

Some more detailed specific comments follow in the next six pages.

If you require any further clarification on these points, please do not hesitate to contact me.

Yours sincerely,



Emily Barker  
Head of Planning and Transport Planning

**Emily Barker**  
Head of Planning and  
Transport Planning

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## **Minerals and Waste Planning Policy**

WCC support the plan's intention to aim for equivalent self-sufficiency for waste management development and to aim for the maintenance of a 7-year landbank for sand and gravel from identified areas.

## **Children, Families and Communities**

Children Families and Communities would like to reiterate the comments made on the previous consultation, which remain valid and are repeated below.

Solihull Metropolitan Borough Council borders the north east Worcestershire district of Bromsgrove and therefore consideration has been given to potential cross-boundary pupil migration.

The Solihull Draft Local Plan sets out proposed development on the west of Solihull covering the Dickens Heath and Shirley areas, which are referenced as the Blythe Area and listed for future development as site 4 (West of Dickens Heath – 350 dwellings), site 11 (The Green – 640 dwellings), site 12 (South of Dog Kennel Lane – 1,000 dwellings) and site 26 (Whitlock's End – 300 dwellings). These sites are of particular interest to WCC's Children, Families and Communities directorate due to the locality of the sites and the current and potential migration of pupils between Worcestershire and Solihull. It is noted that the inclusion of a new two-form-entry primary school has been included in the draft proposals for the Blythe Area to mitigate the impact of housing development, thus increasing capacity in the primary phase of education.

The Woodrush Community High School in Worcestershire has direct links with the adjacent Dickens Heath area, as Tidbury Green Primary School in Solihull is a named school for pupil admissions. Any proposals for this area may impact secondary school provision in Worcestershire as a result of housing development. WCC's Children, Families and Communities directorate would therefore welcome the opportunity to be included in any future consultations on education provision in this area that may impact on Worcestershire provision.

## **Transport**

In the context of this particular response, Worcestershire County Council (WCC) is the Highway Authority for the County of Worcestershire, which adjoins the Solihull Metropolitan Borough boundary near Hollywood and Wythall.

As set out in previous consultation responses to the Draft Local Plan, WCC has concerns about the potential cumulative transport impacts of the growth set out in the plan on the network within Bromsgrove District, in particular around Wythall and Hollywood. It is clear that several proposed allocations will have an impact on Worcestershire's transport network.

Previous responses have confirmed that the specific issues that need to be considered are:

- The nearest motorway junction is M42 Junction 3 which is known to have capacity constraints.
- Some local roads are currently at capacity and transport modelling is necessary to understand the capacity of the local roads to accommodate further traffic generated from new development. In terms of the relationship between growth in the Solihull Borough area and the Worcestershire Highway network, these impacts will primarily be between the borough boundary and the A435/M42. Particular concern has been expressed in relation to the junction of Haslucks Green Road and Tilehouse Lane.
- Car parking capacity at rail stations along the corridor is poor, as is the level of rail service provision.

The Solihull Draft Submission Plan (DSP) sets out proposed residential development to the west of Solihull covering the Dickens Heath and Shirley areas, which are referenced as

- Policy BL1 - West of Dickens Heath - 350 dwellings,
- Policy BL2 - South of Dog Kennel Lane - 1,000 dwellings and
- Policy BL3 - Whitlock's End Farm - 300 dwellings.

These sites represent a total of 1,650 dwellings, representing a significant proportion of the total number of dwellings allocated in the DSP. Each of these developments has the potential both individually and cumulatively to impact on the Worcestershire transport network.

Transport impacts are assessed in the evidence document entitled "Solihull Local Plan - Forecasting Report", dated October 2020. This report sets out a methodology for using the West Midlands strategic Policy Response model (PRISM), together with the results of the analysis undertaken. The following sections consider the traffic impact evidence and the rail evidence presented in that report.

## **Traffic Impact Evidence**

The report includes traffic flow difference plots to show the effect on traffic flow resulting from the allocations being introduced in the DSP. It should be noted that some of the figures appear to exclude any information relating to areas outside the SMBC boundary. In these cases, indications of cross-boundary impacts can be deduced from analysis of traffic flow changes at the boundary.

Figures B.4 to B.6 of the Forecasting report show the traffic flow changes due to the new allocations at the end of the plan period, for the AM peak, the interpeak and the PM peak respectively. These figures indicate significant traffic flow increases on Haslucks Green Road and Tilehouse Lane, the junction of which is in Worcestershire and which is a key concern for the County Council (this concern is set out further below). The information presented in these figures appears to be purely focused on the Solihull MBC area and it is not clear if the vehicle flow difference on the approaches to M42 Junction 3, for example, are negligible or if the evidence excludes the highway network outside of the Solihull area.

Figures B.10 to B.12 of the Forecasting report show the traffic flow changes due to the new allocations and assumed mitigation measures at the end of the plan period, for the AM peak, the interpeak and the PM peak respectively. In contrast to the figures discussed above, these figures do show vehicle flow differences outside of the Solihull Borough boundary. The figures indicate further traffic flow increase on parts of Tilehouse Lane and Haslucks Green Road together with minor increases on the A435 through Wythall.

Figures C.28 to C.30 of the Forecasting report show the volume/capacity (v/c) ratio for the signalised junctions within the study area, including areas beyond the SMBC boundary. These show that M42 Junction 3 is over capacity in all three modelled scenarios at the end of the Local Plan period.

Figures C.46 to C.48 of the Forecasting report show the v/c ratio for the non-signalised junctions within the study area, including areas beyond the SMBC boundary. The figures indicate that all non-signalised junctions within the Worcestershire area which are likely to be affected by the DSP, remain within capacity in all modelled scenarios.

### **Haslucks Green Road/Tilehouse Lane Junction**

In relation to the Haslucks Green Road/Tilehouse Lane junction, the report indicates that the junction will perform with a v/c no greater than 75%. It is not

clear however, how this figure has been calculated or if the figure represents an average v/c for all arms of the junction or the v/c for the worst performing arm. The junction is a priority-controlled junction with the Eastbound Haslucks Green Road traffic giving way to the through route between Tilehouse Lane and Haslucks Green Road (East). As noted above, significant traffic flow increases are forecast on the through route and this would be expected to result in a worsening of operation of the side road. Confirmation of this calculation is therefore required. Further information to address this point has been requested from SMBC but to date it has not been forthcoming.

It is noted that the concern regarding the Haslucks Green Road/Tilehouse Lane junction has also been raised by Bromsgrove District Council and it is understood that relevant policy wording changes have been agreed. The changes relate specifically to Policy BL1 which allocates 350 dwellings at Dickens Heath. These changes are set out below, original text is black, additional text is red:

3.iv. Highway improvements as required including **junction improvements**, speed reduction measures and access improvements along **the Tilehouse Lane / Haslucks Green Road corridor** and Tythe Barn Lane.

These changes will address the concern to a certain extent but placing the requirement on a single development which represents only a small part of the overall quantum of development likely to impact on the operation of the junction may not provide a solution to Plan level issues.

Noting Policy P8 “Managing Travel Demand and Reducing Congestion” which gives Local Plan status to the guidance contained in NPPF on the acceptability of traffic impacts, it is considered unlikely that the above policy wording change will result in the need for any improvement to the junction. However, policy P8(5) also confirms the requirement for “*Transport Assessments and/or Travel Plans to accompany planning applications that include proposals which may generate significant traffic volumes*”. It is assumed that the development included in each Policy allocation triggers this requirement, although a definition in the plan of “*significant traffic volumes*” or confirmation of this assumption would have been useful.

A Transport Assessment that is compliant with Planning Practice Guidance will consider the cumulative impacts arising from other committed development, including allocations, so will, in the case of ‘East of Dickens Heath’, identify the need, at Plan level, for highway improvements along the

Tilehouse Lane / Haslucks Green Road corridor, with the above Policy change. This would not necessarily, however, establish the 'necessity' of that scheme in planning terms for the purposes of Policy P8. There is therefore a risk of unmitigated congestion or road safety issues arising along that corridor.

The Plan is supported by a Draft Infrastructure Delivery Plan. A stated aim of the IDP is that it is a live document that will be updated over the Local Plan period. It is assumed that the evidence collected through the transport assessment process, being of a greater level of detail than that presented at Local Plan stage, would be used to inform updates to the IDP. On that basis WCC would be content that congestion and potential road safety risks along the Tilehouse Lane / Haslucks Green Road corridor due to multiple developments would be resolved. It is the intention of WCC to seek confirmation of this through a Statement of Common Ground. On this basis, no further changes are necessary to the Local Plan policy wording in relation to the Tilehouse Lane / Haslucks Green Road corridor.

## **M5 Junction 42**

The evidence presented in the Forecasting report shows that M42 Junction 3 will be over capacity in all peak periods modelled, including the Inter peak in 2036. The evidence indicates that this is an existing issue and that the development included in the Plan will have a minor impact on its operation.

## **Rail Evidence**

The Forecasting report includes figures which show the forecast changes to public transport patronage, including rail use forecast to arise from the Plan proposals. Figures E.83 to E.85 show the effect of the development in the Plan. Figures E.86 to E.87 show the effect of the mitigation included in the IDP on rail patronage.

Overall, the evidence shows that there will be a minor increase in rail patronage on the Stratford Line, which passes partially through Worcestershire. Whitlocks End rail station is located within Worcestershire immediately adjacent to the Solihull Boundary.

WCC support measures targeted at "Challenge H - Increasing accessibility and encouraging sustainable travel". In relation to Whitlocks End railway station, Policy BL1(2i) requires the construction of "*A pedestrian link north of the hedgerow along Tythe Barn Lane is proposed in order to provide a safe route to Whitlocks End Station*". It is assumed that this pedestrian link will connect onto the existing footway running along the eastern side of Tilehouse

Lane. It should be noted that this footway is not continuous as far as Whitlocks End Railway station. Pedestrians will be required to cross Tilehouse Lane in order access the railway station. The southbound platform is then accessible via the walking routes through the station site. The northbound platform is only accessible by crossing over the Tilehouse Lane rail bridge, the footway of which is narrow.

It is noted that these concerns have also been raised by Bromsgrove District Council and it is understood that a Policy change has been agreed. The change relates to Policy BL1 which allocates 350 dwellings at Dickens Heath. The change inserted at BL1(2.ii) is an additional requirement to provide "*Pedestrian access improvements along Tilehouse lane including over the railway bridge to continue the safe walking access to both platforms at Whitlocks end station*". WCC agree that this change is necessary in order to increase accessibility and encourage sustainable travel, specifically in relation to the use of Whitlocks End Rail station. It would have been preferable however if the change was incorporated into Policy BL1(2i), to make it clearer that a continuous Pedestrian Link is required which provides connectivity between Dickens Heath and Whitlocks End Railway station. WCC are however content with the change and this will be confirmed via a Statement of Common Ground.

In relation to car parking capacity at rail stations along the corridor, WCC support Policy P8(3) which seeks to "*support proposals for local Park and Ride at appropriate railway stations*".