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11 December 2020

Dear Sir/Madam

## **CONSULTATION ON THE DRAFT SUBMISSION VERSION OF THE SOLIHULL LOCAL PLAN**

Highways England welcomes the opportunity to provide comments on the draft submission version of the Solihull Local Plan which covers the period up to 2036.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

Within Solihull, the SRN comprises the M42 and M6 motorways, and the A45, A452 and A446 trunk roads.

In responding to Local Plan consultations, we have regard to DfT Circular 02/2013 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the Strategic Road Network should be considered in the making of local plans. Paragraph 16 of the Circular sets out that:

*"Through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth."*

In addition to the DfT Circular 02/2013, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

We note that the draft submission version of the Local Plan contains locally specific policies and site allocations to accommodate the housing and employment needs identified or forecast by the Council. We also note that upon adoption of the Solihull Local Plan (plan period up to 2036), policies set out in this will largely replace the policies of the existing 2013 Local Plan (plan period 2011 to 2028), except for the site allocations from the 2013 Local Plan which are yet to be delivered. The draft submission plan has identified a net additional housing requirement of 5,270 dwellings that are to be delivered across the Council area over the plan period up to 2036.

Having considered the draft submission version of the Local Plan, we have identified the following areas where clarity and further information is required to continue our appraisal of the plan.

### **Meeting the Housing Need:**

We have reviewed the update on the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Supply Statement dated July 2020 and published in September 2020. The statement identifies a greater deficit in the delivery of housing than was expected across the area. It is noted that this is after 2031, and that for the life time of this plan Solihull will be providing capacity for approximately 2,000 dwellings to contribute to reducing this under provision.

However, should the housing numbers in the statement be challenged during the Local Plan consultation or subsequent examination, any further housing requirements will need to be fully assessed and modelled. This will enable us to identify the impact this would have on the operation of the SRN and any need for additional mitigation.

### **Transport Evidence Base:**

Based on our initial review of the draft submission version of the Local Plan, transport reports and other supporting documents, we have identified a prioritised list of items (given below) where we require further information or clarification to help in completing our review of the documents supporting the Local Plan:

1. Clarity on the development quantum proposed/assumed at UK1 and UK2 site allocations: This will allow us to determine the impact of these proposals individually and consider whether these assumptions are robust.
2. Flow information from PRISM assessments for Base, 2026 and 2036 scenarios: This can be provided in the form of shape files which can be used for the development of LinSig models as suggested below.
3. Base Turning counts for SRN junctions if available
4. Clarity on whether the modelling work includes the proposed improvements at M42 J6 and any improvements associated with HS2 (M6 J4)
5. A table of flows with associated plots are requested to show the amount of development traffic plus overall traffic expected on the M42 and A45 (SLP and DLP Scenarios). In addition, V/C plots are also requested to check the traffic impact on these SRN routes (SLP and DLP Scenarios).

6. Further analysis is required to understand whether SLMP development traffic rat-runs away or displaces any non-development SRN traffic along the M42 and M6. If traffic is not being displaced, no further analysis on this matter is needed. However, if traffic is being displaced, we would like some sensitivity analysis carried out to understand what would happen if traffic did not rat-run so that the full impact on the SRN corridor could be understood.

These matters were discussed in our meeting on the 7 December 2020 and had been set out in our previous email dated the 23 November 2020. We will continue to work proactively with yourselves on this matter and would appreciate if the above listed items can be provided by the Council at the earliest opportunity

### **Environmental Issues:**

It is noted that the draft submitted version of the local plan and identified allocations will increase the number of residents in proximity of the SRN. This is especially relevant for proposals at the NEC for 2,200 dwellings and a new residential community at Arden Cross of up to 3,000 dwellings. It is likely that these locations will be impacted by noise pollution from the SRN and raise the potential for exceedances of air quality standards.

Policy P14 – Amenity does set out requirements for developments to not have a ‘significant adverse impact’ on local air quality but this does not directly relate to the SRN and what mitigation may be required. Therefore, this policy may need to be modified further. It also sets out the requirements for considerations when developing the proposals for allocations in terms of noise pollution, and we support this approach. We will continue to work proactively with yourselves on these matters but would recommend a specific policy which identifies how air quality impacts and noise pollution would be monitored and managed and what interventions may be required.

In addition, to the south east of the M6 / M42 Interchange is the River Blythe Valley and the Coleshill and Bannerley Pools SSSI. The environmental impact the plan proposals could have on these needs consideration, especially if the proposals increase the volume of traffic utilising the M42 Corridor.

### **Interaction with the SRN:**

Based on our assessment and consideration of the site allocations there is greater potential for interaction with the SRN. This is notably where new structures and sustainable transport infrastructure are being proposed over the M42 Corridor.

We consider that a policy should be developed which sets out standards and requirements to enable such infrastructure to be provided safely over our network. This should ensure measures are in place which mitigate any accidents or incidents that could endanger public health and the safe and efficient operation of the SRN at these locations. We will continue to work proactively with yourselves on this matter.

**Statement of Common Ground**

We have committed to continue to work with yourselves in a collaborative and constructive manner to support the progression of the Local Plan. As part of this approach we will work with you to develop a Statement of Common Ground between ourselves.

We trust that the above is useful in the progression of the Local Plan and welcome continued discussions with the Council to this end.

Yours Sincerely



Ben Simm  
Spatial Planner  
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