



Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For official use only)

Name of the Local Plan to which this representation relates:

Solihull Local Plan – Publication Stage

Please return to psp@solihull.gov.uk or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14th December 23:59

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*		2. Agent's Details (if applicable)
<i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.</i>		
Title	Miss	
First Name	Helen	
Last Name	Davies	
Job Title (where relevant)	Senior Policy Officer	
Organisation (where relevant)	Transport for West Midlands	
Address Line 1	West Midlands Combined Authority	
Line 2		
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Post Code		
Telephone Number		
E-mail Address		

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="Yes"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text" value="Yes"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="Yes"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Transport for West Midlands (TfWM) – the transport arm of the West Midlands Combined Authority (WMCA) is in support of the Solihull Local Plan (Publication Stage) overall. We feel engagement has been undertaken and overall the plan is in alignment with our overall transport policies.

However, we feel there are areas where minor modifications could be made, to ensure the plan is sound and fully compliant with our wider policy objectives as a Combined Authority.

Our letter attached (enclosed in the email) highlights all the key areas where we request minor

modifications to the existing policies, to help strengthen the sustainable and active travel offer. Whilst these modes are picked up throughout the local plan, we feel these need to be strengthened, to support future development - ensuring they reduce car usage and meet our wider goals such as inclusive growth and the climate change agenda, as examples.

Below, now outlines the key issues in our letter (dated 14th December 2020). TfWM do not object to the Solihull local plan and are very supportive of the plans vision and key objectives.

The requested minor modifications will only help strengthen the sustainable transport offer, currently provided in the plan and ensure it aligns more closely with those objectives of the WMCA and the NPPF.

Below now sets out TfWM's suggested modifications, which cover several chapters.

Vision Section

Overall, TfWM is very supportive of the documents vision and associated aims. The plan states “the borough will be a more accessible and integrated place where walking, cycling and public transport are more attractive and convenient alternatives to travel than by car”. For Solihull to deliver on its growth agenda and attract economic investment, ensuring the right provision and necessary transport improvements is therefore vital and high-quality transport infrastructure will be fundamental, both across Solihull and the wider region.

There is no doubt the proposed housing development sites across Solihull and UK Central will create extra pressure on demand on the Key Route Network as well as on existing public transport. TfWM therefore welcomes acknowledgment of Solihull's transport challenges and in partnership, we will continue to develop solutions to these issues.

To do this effectively, we require clarity as to how such developments, and especially those being proposed in the green belt will be made accessible by sustainable transport modes. Transport master planning will be imperative to achieving this, and should be done at the earliest possible opportunity - to ensure developments are as sustainable as possible and we would like to work closely with Solihull MBC and developers as such sites progress through the planning system.

Sustainable Economic Growth Chapter

Solihull faces significant challenges for planning for future homes and jobs across the borough, and whilst TfWM considers that the ideal location for new development is concentrated in areas already well served by public transport, such as high-volume corridors (as emphasised in TfWM's 10 year Delivery Plan), we appreciate that other sites will also need to be considered.

For such sites located in the green belt, sustainable transport should play a major role – with the plan demonstrating good accessibility measures and sustainable transport infrastructure in place. This is especially important for employment sites such as Birmingham Business Park, Blyth Valley Business Park and Damson Parkway, where currently these sites do not reflect sustainable commuting patterns.

Modification request: Policy P1 UK Central Solihull Hub Area UK and P1A Blyth Valley Business Park should demonstrate the importance of transport master plans, with opportunities being demonstrated which can reduce car

dependence and fully promote sustainable transport.

Regional connectivity

The local plan refers to HS2 growth and significant employment opportunities through UK Central. Yet delivering on high levels of employment growth, relies heavily on good accessibility to jobs, especially for those residents without access to a car in the region, including groups such as the unemployed, those living in more deprived areas and young people.

To ensure good accessibility to employment, improved transport connections - especially by traditional bus services and good cycling and walking infrastructure will be critical, together with supporting the principles of inclusive growth, to support those more deprived neighbourhoods.

Modification request: Under Policy P1 UK Central Solihull Hub Area, reference should be made to the WMCA's HS2 Connectivity Package, which demonstrates the importance of improved transport connections and accessibility by public transport, cycling and walking, from local neighbourhoods to key employment growth opportunities in this area like UK Central. This will go onto support wider WMCA objectives like inclusive growth – through connecting people to vital opportunities.

Linking into this, reference to the emerging Local Transport Plan as well as the Delivery Plan for the region should also be made in the chapter. This transport plan highlights good regional and community connectivity to key employment growth areas, with greater emphasis on the importance of traditional bus services which assist more vulnerable communities together with good walking and cycling measures to connect communities to key opportunities.

Providing Housing for All & the Settlement Chapters

Whilst concept masterplans have been produced for each housing site, no detailed transport master planning has been undertaken. We feel this exercise needs to take place before any planning permission is granted on the sites, to ensure all new development is sustainable, both in terms of the environmental impact and the impact it may place on existing infrastructure, understand any cumulative impacts of new development and to support the overarching goals of Solihull MBC and the WMCA (see Transport for West Midlands Response to Solihull Masterplan Consultation: 16/05/2018).

While we encourage new development to take place in the most accessible locations (where the most journeys can be made through active travel or public transport), this will not be the case for many of the sites proposed. Sustainable transport considerations should therefore be fundamental throughout the planning process and not retrofitted later, when it is often too late.

To add to this, new housing sites should be either mixed use or be close to a major source of jobs, education, health facilities and key amenities like shops and services; reducing the need to travel and providing opportunities to work, learn, shop, play and socialise locally. Future-proofed digital infrastructure should also be provided for in all new development, including superfast fibre broadband.

Henceforth, a masterplan for each site or clusters of sites should scope out a transport network covering all transport modes including bus corridors, as well as good walking and cycling links, shared spaces, interchanges, stops and shelters and full consideration paid to transport innovation measures, services and infrastructure. Transport site proposals should also connect well to the wider surrounding area – including public transport corridors, train stations, the bus network and Local Cycling and Walking Infrastructure Plans.

Such masterplans should also provide a full assessment of the current transport issues for each proposed site, and TfWM will help where possible to support this process.

Modification request: For each development site, or where there are clusters of sites in close proximity to one another (with likely cumulative impacts), transport masterplans should be undertaken. TfWM request that the undertaking of transport masterplans be built into policies within the Providing Homes for All chapter under policy P5 – Provision of Land for Housing and echoed throughout other policy areas within the plan.

Improving Accessibility & Encouraging Sustainable Travel Chapter

This chapter is most relevant to TfWM and we welcome the principles established within this chapter. We praise reference made to the West Midlands Strategic Transport Plan ‘Movement for Growth’, however, acknowledging the emerging Local Transport Plan for 2021, as well as TfWM’s Delivery Plan would also be encouraged.

We see the potential growth can bring, such as to provide new opportunities for improved public transport and cycling and walking infrastructure, which can then bring benefits to both new and existing communities. Yet at the same time, the predicted increase in traffic at many of the proposed development sites is a concern and will likely result in further congestion and poorer social and environmental outcomes in the longer term.

The WMCA’s #2041 Climate Change Strategy/Action Plan should therefore be noted in this chapter, especially as transport is the biggest source of carbon emissions. And despite improvements to engine technologies, transport emissions have stayed high over the last 30 years; largely because of increased travel demand associated with economic and population growth and increased car usage. The transport and planning systems should therefore respond to these challenges, by playing their part in reducing the need to travel.

Modification request: Within ‘Policy P7 Accessibility and Ease of Access’, the ambition for a low carbon economy requires a stronger emphasis on decarbonisation priorities for transport and how these will significantly contribute to reducing carbon emissions and meeting the regions wider environmental goals and climate emergency.

There should also be reference made to the WMCA’s #2041 Climate Change Strategy/Action Plan and the importance of sustainable transport in responding to the climate emergency.

Additionally, design, density and location of new development is critical for encouraging sustainable transport; influencing how far people need to travel and

minimising the negative effects of car dependency, such as congestion, poor air quality and noise pollution. Providing for good digital connectivity could also help avoid the need to travel and provide alternative accessible solutions as we have seen during the pandemic. Given the importance of these issues within the emerging Local Transport Plan and its green paper, and how they relate to wider WMCA and Mayoral objectives, it is critical that we get this right. TfWM therefore highlights some specific areas we feel this chapter could elaborate on and where we can add further assistance.

Sustainable and active travel

To be truly sustainable, developments need to be located close to existing facilities or be mixed use; accompanying a range of community amenities. Higher density developments then help make the provision of such facilities and sustainable transport economically viable and reduce the overall demand / need to travel.

The NPPF echoes this view (paragraph 103 & 104) where it states “significant development should be focused on locations which are, or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes including walking and cycling”together with ensuring “an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed to employment, shopping, leisure etc”.

As the location of some of the sites don't offer good sustainable transport options, this needs to be addressed.

Modification request: In this chapter, a separate walking and cycling policy should be included. This will ensure that all new development is planned and constructed with walking and cycling as the primary means of local access, and fully integrated into the existing walking and cycling infrastructure, as well as the wider public transport network – fully serving local train stations and existing public transport corridors. In turn, connecting communities to wider opportunities.

How new site infrastructure will be included in Solihull's Local Cycling and Walking Infrastructure Plans, as well as the Strategic Cycle Network is also fundamental and should be noted in a dedicated walking and cycling policy.

Also, how walking and cycling routes should be safe, attractive, direct and navigable, with dedicated separate space for both pedestrians and cyclists wherever possible, and green infrastructure such as canals and parkways being used to enhance opportunities should also be noted in policy.

Transport Innovation

Digital infrastructure and communications technology are viewed as a vital component of modern life, with the government's UK Digital Strategy setting out the importance of providing world class digital infrastructure, with £1 billion of investment planned to support the roll-out of next generation digital infrastructure, including 5G.

The West Midlands is benefiting from such digital investment, through being part of the Future Transport Zone. By working with developers and transport

providers, we are ensuring that new developments are designed to enable the installation of the most up-to-date digital connectivity.

And whilst good public transport should always be provided for to serve new development, we understand that this may not always be possible. As a substitute, flexible on-demand responsive transport as well as shared services like car clubs, shared taxi's, bike hire facilities, scooters and other micromobility measures together with mobility credits and MaaS should play a key role in filling the gaps. It is also important that such flexible, on-demand transport modes fully connect into more traditional public transport routes and that good interchanges are fully considered in planning policy for new development.

Modification request: Policy P7 Accessibility and Ease of Access should include the importance of transport innovation for enhancing accessibility, covering the need for flexible on-demand responsive transport as well as shared transport services in the form of car clubs, shared taxis, micromobility options and TfWM's new bike hire schemes for all new development.

Mobility credits, discounted public transport tickets for new residents and Mobility as a Service should also be captured in policy P7 as other innovative measures which support new development.

The use of low- or zero-emission vehicles, through providing appropriate ULEV charging infrastructure should be mandatory¹, and be provided for both private and shared vehicles, as well as electric charging facilities for bikes.

Mobility / travel hubs and interchange facilities should also be provided for on all new sites, to connect the different modes together.

Public transport infrastructure

Designing and providing the right sorts of infrastructure to facilitate good public transport access as well as active travel measures within the sites is vital. While we support the plans reference to undertaking Transport Assessments and Travel plans for all new development, this should be to enable walking, cycling and public transport usage and deliver high quality, attractive, liveable and sustainable environments, and not simply to mitigate against highway issues alone. The WMCA Design Charter in particular focuses on good design guidance.

Modification request: Policy P8 Managing Travel Demand and Reducing Congestion should be altered to ensure all Transport Assessment/Transport Statements/ Travel Plans are fully required for all new development; ensuring good walking, cycling and public transport usage and support in the delivery of high quality, attractive, liveable and sustainable environments.

Policy P8 should also note the importance of the WMCA's Design Charter which promotes good design initiatives and quality place making across the region including active travel and public realm measures.
<https://www.wmca.org.uk/media/3647/wmdesigncharter.pdf>

There should also be far more emphasis on developing new walking, cycling

¹ Legislation under the Automated and Electric Vehicles Act

and public transport routes and associated infrastructure, through and around the sites proposed. Such routes should consider how they connect to nearby opportunities like employment areas, local amenities and the wider public transport network (beyond a sites boundary) to help improve the overall coverage, quality and integration of the existing infrastructure.

TfWM further want to ensure that developer contributions fund public transport improvements including stops, shelters and interchanges with appropriate information and accessible step-free access (both within and adjacent to the development site).

Developer contributions should also be gained to subsidise new or amended public transport services into a development, for example bus diversions or Demand Responsive Transport. They should also be gained to improve accessibility measures at nearby railway stations including step free access measures and cycle provision as well as contributing to larger scale transport infrastructure improvements, as laid out in the existing and emerging local transport plan.

Modification request: Policy P8 should further request developer contributions, covering required/appropriate public transport infrastructure - both within, adjacent and closeby to the development site together with subsidising new or amended public transport infrastructure and services, where a development would otherwise have inadequate public transport access.

Contributions should also be sought for larger scale transport infrastructure improvements, as laid out in the existing and emerging local transport plan and delivery plan.

Protecting and safeguarding transport alignments

Safeguarding TfWM's future transport aspirations is vital, for expanding on our public transport network in the region. In Solihull, several proposed Sprint routes as well as the East Birmingham and Solihull Metro route are ambitions, and while these routes are referenced in the local plan under Policy P8A Rapid Transit, TfWM would welcome these to be fully safeguarded and referenced in the proposed policies map.

Modification request: TfWM would welcome the proposed Rapid Transit Routes, as highlighted in P8A to be also referenced and protected in the policies map and we will work in partnership with Solihull MBC to explore ways to safeguard these routes.

Freight

The growth in on-line retailing and 'just in time' approaches to manufacturing has resulted in an increase in the numbers of smaller scale deliveries being undertaken in the region, particularly by vans - in turn contributing to congestion and pollution.

TfWM feels reference should be made to increased freight levels and that the plan should aim to minimise the adverse impacts freight can bring to communities. Exploring ways deliveries can be consolidated, the use of low- and zero-emission vehicles including electric vehicles, cargo/E-cargo bikes, changing

procurement practices, and avoiding the need for repeat delivery attempts should all be policies in the plan, and covered in the master planning process.

Modification request: Under Policy P8 Managing Travel Demand and Reducing Congestion TfWM requests that the policy adds additional text on the efficient and sustainable movements of freight. Such additions should consider:

- Ensuring provision of consolidation centres/hubs and the use of low- and zero-emission vehicles including electric vehicles, cargo bikes and E-cargo bikes for local and last mile deliveries.

- Ensuring new development provides appropriate provision for deliveries and servicing, with consideration paid to road safety issues, traffic congestion and environmental impacts.

- Consolidation facilities/ Hubs should also be considered in all developments. This could be achieved through the production of Delivery and Servicing Plans by developers from the outset, to ensure freight movements are fully considered.

West Midlands Key Route Network (KRN)

The West Midlands KRN plays a vital role in our region by supporting public transport as well as freight and logistic movements. Yet many of the proposed housing sites in the greenbelt will put additional capacity pressures on the KRN.

Several routes within the KRN including the A34, A41, A45 and A452 are already heavily congested, which new development will only add to. Where a cluster of development is planned, the cumulative impacts of this, together with the impacts of HS2 construction will further put pressure on key sections and junctions.

It is important to ensure that any development proposed, does not place any undue pressure on the existing KRN and that any development takes account of the increased demand it may place on existing provision. TfWM will consequently work with Solihull MBC to ensure that new development is supported as appropriate by improvements to the KRN.

Modification request: With our highway network under stress, through new developments impacting negatively on local communities such as through road safety, air quality and congestion, under 'Policy P8 Managing Travel Demand and Reducing Congestion' the policy needs to acknowledge the importance of network resilience, and fully understand how development will impact on the region's wider congestion management of the KRN.

New development close or along the KRN should follow the principles in the Congestion Management Plan and KRN Route studies and fully access and mitigate against any development impacts.

<https://www.tfwm.org.uk/strategy/movement-for-growth/krn-reports-and-congestion-plan/>.

Construction traffic

There are no mitigation measures referenced in the local plan for construction

traffic, with exception to Balsall Common Barretts Farm development and HS2 construction. Yet given the growth planned, ensuring Construction Management Plans are produced for significant development is encouraged, to mitigate against construction logistics and the environmental impacts on the surrounding area.

Modification request: The undertaking of Construction Management and Logistics Plans, together with Delivery and Servicing Plans should be incorporated into the local plan as policy, together with adherence to the Construction and Logistics Community Safety Scheme (CLOCS) to minimise against the impacts of HGVs and LGVs on the surrounding highway.

Cycle safety measures should also be included for all new development; providing safe routes for cyclists during the construction period and beyond, together with consideration of how freight and servicing may impact upon the public realm and Solihull communities in general.

Park and Ride

TfWM's Park and Ride policy discourages short car trips made to stations and encourages more viable and sustainable options, especially in areas where new housing development is within 2km of the station. Yet where Park and Ride provides a good interception opportunity for traffic both travelling into the region from the shires, and beyond, this is favoured. Stations including Whitlocks End and Dorridge are good examples of interception locations.

Whilst Berkswell is not a location TfWM would usually prioritise for Park and Ride (due to low service frequency and high proportion of users living within one mile of the station), it does provide some opportunity for interception, especially from west Coventry and Kenilworth areas, through the delivery of the new relief road. Any plans for a developer led car park at Berkswell should be undertaken in conjunction with TfWM to the adopted design principles for Park & Ride with operation ideally transferring to TfWM to allow for consistent operation of such facilities within the WMCA area.

Park and Ride expansions are therefore subject to several conditions being met (as outlined in the WMCA's Park & Ride policies and principles report). Where sites have good interception opportunities or provide an entry point to rail and rapid transit services for areas outside of reasonable sustainable access, TfWM is generally supportive. Yet stations with existing short car trips and sites or where new development is within 2km of the station, TfWM would encourage a focus on enhanced sustainable access options instead.

Modification request: Park and Ride expansion is therefore subject to conditions being met – as outlined in the WMCA's Park and Ride policies and principles report. See [link to full report.](https://governance.wmca.org.uk/documents/s2723/Report.pdf)

Also under 'Policy P8 Managing Travel Demand and Reducing Congestion' (bullet point 3) it should be amended to ensure sites meet conditions as outlined in the WMCA's Park and Ride Policies and Principles report.

Protecting and Enhancing our Environment Chapter

This chapter should firstly note that the WMCA declared a climate emergency last year. In response, it has adopted a carbon budget and is developing a series of 5-year plans to decarbonize the region to ensure it follows the required pathway for carbon neutrality.

As transport is the biggest source of carbon emissions, it needs to play a key role in the response. Despite improvements to engine technologies, transport emissions have stayed high for the last 30 years; largely because of increased travel demand associated with economic and population growth and increased car ownership. The transport system therefore must respond to these challenges with planning also playing a key part in helping reduce the need to travel.

Therefore, while we praise this chapter and the ambition for a low carbon economy, TfWM seeks a stronger emphasis on decarbonisation priorities for transport and how these will significantly contribute to reducing carbon emissions and respond to the climate emergency. Whilst increased usage of public transport and active travel modes is mentioned in this chapter, other measures such as the phasing out of fossil-fuelled private vehicles and replacing with zero emission alternatives; establishing zero-emission bus fleets; and fully decarbonising road freight, as well as shifting to more rail / water freight alternatives should be noted.

Modification request: Under policy P9 Mitigating and Adapting to Climate Change, decarbonisation priorities for transport, and how these will contribute to reducing carbon emissions should be noted to fully align to the WMCA's #2041 Climate Change Strategy/Action Plan in response to the region declaring a climate emergency. The promotion of zero emission vehicles, zero emission bus fleets, the decarbonisation of road freight, and increased use of shared mobility should further be referenced as key measures in this policy.

The roll out of Electric Vehicle charging for all new development should also be noted as a policy in this section to support the decarbonising of transport.

A reduction in parking spaces in new developments— especially in town centres, where density is highest and where existing public transport access is greatest should also be a policy. This, alongside the roll out of mobility credits and good active travel and sustainable transport options will then help support the decarbonising transport agenda.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

TfWM do not wish to participate in the hearing session as we do not object to the plan. We therefore are requesting on minor modifications to be made on a number of policies, as outlined above.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:

14.12.2020