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Becky Matravers, Solihull MBC – Planning Department

By email only

24th May 2024

Dear Becky,

<u>Planning Application - PL/2024/00598/PPOL Land South Of Dog Kennel</u> Lane Shirley Solihull

Cheswick Green Parish Council objects to this planning application on the following grounds:

Highway Safety and congestion

Elected members have ignored the opinions of their Officers and the views of National Highways. This application should not be granted in full until a comprehensive assessment of the cumulative traffic impact across the local highway network has been completed. All works identified should be partly funded by this development on a proportionate basis.

Indeed, BL1, BL2 and BL3 must be treated similarly and why are all three developments to be undertaken in the first five-year phase? Traffic chaos (including construction traffic) will ensue and the risk to the health and safety of our residents is of great concern.

ZF Automotive UK Ltd c/o Richborough commissioned Hub Transport Planning Ltd to undertake a transport assessment.

Within section 3.0 Background Information and Highway Safety, points 3.9, 3.10 and 3.11 Hub have acknowledged existing heavy levels of traffic and traffic flow. Another housing development will lengthen existing delay and increase the risk to the health and safety of people.

- 3.9 Peak period traffic surveys have been undertaken at the A34 Stratford Road/Dog Kennel Lane and A34 Stratford Road/Monkspath Hall Road roundabouts, with ATC speed survey data also collected on Dog Kennel Lane and the A34 between the two roundabouts.
- 3.10 The existing highway network immediately adjacent to the site carries a significant amount of traffic, both during peak periods and on a daily basis.
- 3.11 In the immediate vicinity of the site, the two A34 roundabouts operate with varying levels of queueing and delays during the peak hours; however, the A34 corridor is heavily trafficked and, as such, delays across this part of the highway network are a common occurrence.

The Parish Council would qualify Hubs comments above. The developer will exacerbate the problem not only by constructing 550 dwellings, but by creating a chaotic cross flow of traffic.

Apart from buses and cyclists there is only one point of access and egress from the development. All vehicles will have to turn left out of the development and those heading towards the M42, will have to reverse their direction of travel. The average home comprises of 2.2 vehicles per dwelling. Therefore, on average 1,210 vehicles will potentially exit onto the Stratford Road, at least once every day. How many of those vehicles will reverse their direction of travel?

This is just one example of the creation of a cross flow of traffic, The Taylor Wimpey development will only exacerbate the situation, as will the development at BI 1.

Within section 5.0 Sustainability, point 5.2 Hub states 'It is worth highlighting that Solihull Council already considers that the site is in a sustainable location, in transport terms, by virtue of the proposed allocation for development.' How could Solihull Council make such a claim when no cumulative traffic impact assessment across the highway network has been undertaken?

Within section 6.0 Traffic Generation, Distribution and Assignment, point 6.1 states 'There are currently on-going discussions with Solihull Metropolitan Borough Council (SMBC), National Highways (NH) and the site promoters regarding the development of a coordinated traffic model for the local area which incorporates all the allocated Local Plan sites and committed developments, to provide a comprehensive assessment of the cumulative traffic impact across the local highway network.'

National Highways stated at one of the Government Inspectors revised Local Plan enquiry sessions, that a co-ordinated traffic model should have been undertaken as part of the Local Plan. Indeed, they also said that with the increase in traffic the island at Junction 4 of the M42 would have to be remodelled. Furthermore, National Highways have made these statements in respect of the Hub transport assessment:

- 1. We recommend the applicant clarify or confirm if they are seeking an increase of the number of dwellings from the Local Plan allocation.
- 2. We note the applicant has split the education development trips between primary school and secondary school equally. We require the applicant to provide the data National Highways Planning Response (NHPR 24-02) February 2024 source (including NTS Table ID) and details of how these proportions were obtained from the 2022 NTS data.
- 3. We welcome the applicant to distribute residential development trips according to the 2011 Travel to Work Census data ('location of usual residence and place of work by method of travel to work'). We require the applicant to provide further details for the route chosen for each Local Authority district for our review. Can the applicant set out how existing peak hour congestion levels have been taken into account.
- 4. We are not yet in a position to comment upon the scope of junction capacity assessments, given that we have raised comments related to trip generation exercises. However, we note that the development vehicular trips may have the potential to impact SRN junction (at M42 Junction 4) during peak periods. Therefore, the applicant should note that junction modelling of the M42 Junction 4 could be required. The two-way AM and PM peak hour development trips which impact the SRN junctions are required to inform potential junction capacity assessments for the development. Typically, the combined peak hour trips are provided in the form of a traffic flow diagram.
- 5. In addition, all base models for the SRN junctions need to be validated to observe queues and or journey time data (or journey time data dependent on the model being run) on a neutral day (dependent on package used) to ensure that the model is reflective of the existing performance of the SRN.

6. Considering the above, National Highways recommend that planning permission not be granted for a period of three months from the date of this response to allow sufficient time for the applicant to provide further information regarding trip distribution on the SRN, and, for National Highways to review and respond to information provided.

Clearly the Hub assessment has yet to be finalised.

We raised concerns over the existing and future levels of traffic congestion in the area as part of our previous objection. The Parish Council carried out its own survey and provided photographs of traffic congestion levels in the area.

The Hub assessment has not taken into account the previous comments that were put forward and there is no evidence provided to address our concerns that the existing traffic congestion issues in the area will be resolved.

The Hub assessment does not respond to the objections that have been previously submitted. Both sites within BL2 are substantial with up to 1550 dwellings and a 2-form primary school with early years facility proposed. The potential traffic generation and movements associated with the site are significant. Yet, the Council's updated 2020 Transportation Study Evidence does not include a Transport Study for the site whereas the 2020 evidence does include Transport Studies for Knowle and Balsall Common.

We consider that the Council does not have sufficient evidence on transport issues to come to an informed decision on the implications that the development of the site will have on traffic and movement within the area. Policy BL2 is not therefore justified on highways and movement grounds.

The site is relatively close to junction 4 of the M42 but, the proximity of the site to the motorway and its displacement from major employment areas are major concerns. We feel that the site will not be sustainable and will encourage car journeys to places of work, whether they are in the borough or further afield. This will of course exacerbate existing traffic issues in the area. The development of the site cannot therefore be justified against the travel and ease of access policies that are included within the publication draft of the Local Plan.

The research we carried out in 2019 confirmed delays in the evening of up to 45 minutes caused by traffic travelling to or from junction 4 of the M42. The morning delays are less significant. This is probably due to journey times being staggered over a longer period of time. However, delays of 7 -15 minutes are typical during the morning travel period. Since then, the tailback of traffic has increased. Tanworth Lane is also affected by traffic congestion. This is compounded by traffic associated with current construction sites in the area. This means that the road is regularly gridlocked by traffic trying to find its way around the Blythe area.

The only concession in the concept masterplan is the inclusion of a primary school within BL2. It has been argued that this will help to reduce congestion. We cannot accept this point. It is now commonplace for children to be taken to school by car. This can be because parents have children at different schools that are in different locations. This would apply if parents had for instance a child at the primary school and other children in secondary education or nursery. This would not ease congestion; it simply means that children would be dropped off at the school as part of a larger journey. The general connectivity of the site will leave residents with little choice other than to use their own vehicle to travel. This could be travel onto the motorway network or main road network. The lack of public transport options in the area, means that even residents who commute to work by train, are likely to have to use their car to get to a railway station. The release for residential development will only intensify traffic issues in the area. We therefore object to the release of the site on traffic grounds alone.

Flooding issues likely to occur with development south of Dog Kennel Lane

The area in which this proposed development is sited, lies within the catchment area of Mount Brook which ultimately joins the River Blythe in Cheswick Green. This brook has a history of flooding issues which have been exacerbated by recent housing developments in this area, including the building of the Bloor Homes development of Cheswick Place. This is despite measures being put in place including swales to try to minimise the impact. The area is underlain by clay soils which rest on clay rocks below. Although clay is porous, it is impermeable which means that rainwater will not pass through it and so after any heavy rainfall event, runoff will increase dramatically. This has already been seen on several occasions in recent years, and in particular over the last few months which have had very high rainfall totals. This may well be what will happen in the future with climate change.

By allowing any more new housing, vegetation is bound to be lost which would have reduced the amount of runoff by absorbing water for growth. Tarmac and concrete and other building materials are all impermeable and also do not directly use any water. All the runoff from the housing will ultimately end up in the brook.

The amount of development that has been proposed for this area is excessive and little thought has been given to the consequences regarding flooding issues to those already living downstream, not only those within Cheswick Green as the Blythe flows right through the borough, passing quite close to Solihull Town centre. The provision of ponds and swales is not going to prevent the amount of runoff and hence the flooding risk from increasing.

Some residents of Cheswick Green have had flood defenses fitted to their properties, these were installed free of charge by SMBC, as Solihull MBC is well aware of the flooding issues in the area.

Lack of provision for healthcare

Cheswick Green Village Surgery is part of GPS healthcare.

The majority of people who live in Cheswick Green use this surgery and already have difficulty in obtaining appointments, in fact it is a constant battle. Like so many other GP surgeries, being part of a healthcare group, means that inevitably your appointment will not be at your local GP surgery. Cheswick Green residents have to travel to other surgeries around Shirley and Solihull, and they alike travel to Cheswick Green. This alone adds to the volume of traffic, as mentioned in the objection in relation to highway safety and congestion.

GPS have advised residents of Cheswick Green, that the practice can no longer cope with the amount of people they serve, this is due to development in the areas already mentioned (Cheswick Place/Blythe Valley). Cheswick Place alone added a substantial number of patients before Blythe Valley, then with additional patients from Blythe Valley, it is not difficult to see why such a small practice became part of a group, rather than a stand-alone surgery, but it still has difficulty functioning.

Cheswick Green Village Surgery has informed residents, it needs more GPs, but it cannot recruit, as there is nowhere to put them. There is no space within the surgery itself.

This Parish is once again presented with another planning application which shows no regard for additional doctors to serve the new community proposed. Where will the residents of this new development be seen and treated? If the answer is Tanworth Lane, then they will also become part of the GPS group.

According to the British Medical Associations own statistics regarding safe working, there are now only 0.44 qualified GPs per 1000 registered patients within the UK - is it actually conducive for the health and well-being of the

patients already registered within the Cheswick Green parish, to expect our current surgeries to take on more new residents with the existing service, which is already stretched, to accommodate any additional residents to the area.

As the surgery will receive an increase of patients and thus more income as per the Carr-Hill formula, will assurances be put into place to ensure that this money is directed towards the increase of recruitment towards new GPs and an increase of services provided within the parish?

As mentioned, appointments are already extremely difficult to come by, even for repeat appointments as required from hospital referrals and discharges, with residents being forced to use the multiple locations owned by GPS Healthcare, with no consideration given to factors including distance, means of travel etc.

Dentistry

Once again, there is no provision for any additional dental practice, at a time when people are not able to obtain NHS dentistry, and many travelling across the borough to obtain such services.

Schools/education

Whilst BL1/2&3 have been ear marked for the provision of a new primary school, there is no mention of secondary school provision.

September 2023 saw Year 6 students from Hockley Heath Primary School be declined their first choice of Tudor Grange School. Hockley Heath has historically fed from Year 6 primary into Tudor Grange School and is even part of the Tudor Grange Academy. The development of Blythe Valley park has impacted this feed and the only students to be offered a place were those with older siblings, already attending at Tudor Grange.

There is no indication which secondary school, students from within the new community will attend. The Parish Council feel this will jeopardise the places at Alderbrook school, normally given to the students of Cheswick Green parish.

In the last ten years Cheswick Green Parish has seen the building of over a thousand new homes, with no new medical facilities, road improvements and only recently the expansion of the primary school. Added to this is the development currently taking place to the north of Dog Kennel Lane. Also, within the last forty years we have seen the building of Dickens Heath and Monkspath/Hillfield. There has also been the construction of a considerable number of care homes and apartments for the elderly on the Stratford Road corridor, which is bound to put further strain on already far overstretched medical facilities.

Other parts of the borough have not been subject to this sort of concentrated development and so much more thought is needed as to where best to add any new housing.

Yours sincerely,

Marie Zizzi Clerk Cheswick Green Parish Council