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Mr. Roger Clews
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Dear Sir

**THE BIRMINGHAM DEVELOPMENT PLAN EXAMINATION in PUBLIC:
Supplementary statement of the Highways Agency**

The Agency is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England, which includes all motorways and major trunk roads. The SRN in the vicinity of Birmingham comprises sections of the M5, M6, and M42 Motorways.

The Highways Agency recognises the importance of a long-term and stable Development Plan for Birmingham as an essential framework for the sustainable economic growth of the City and surrounding region. As such, the Agency is aware of the importance of the forthcoming Examination-in-Public of the submitted Birmingham Development Plan.

The Agency has been invited by yourself to assist at the Examination in Public in your consideration of Matter E: Green Belt policy, the Langley Sustainable Urban Extension (SUE) allocation and the Peddimore employment allocation. The Agency will therefore be present at the session considering Matter E commencing on 28 October 2014. Mr. Matthew Taylor, the Asset Manager for the Birmingham 'Motorway Box' will be in attendance supported by colleagues from JMP Consultants, the Agency's spatial planning advisory consultant.

The Agency supports the Plan led approach to land use decision making and works within the remit of DfT Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development'. Paragraphs 12, 13 and 14 set out the Agency's general approach to Plan making;

"12. The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all....."

"13. To make most efficient use of the limited available capacity on the strategic road network, and because additional physical capacity is difficult, costly and takes time to

provide, the Highways Agency will engage in the Local Plan process to reduce the potential for creating congestion on the strategic road network.”

“14. In framing its contribution to the development of Local Plans, the Highways Agency’s aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the strategic road network.”

The Agency makes the following comments to inform your consideration of Matter E and Matter F: The Duty to Co-operate:

Matter E: Green Belt Land Allocations.

Policies relating to the proposed Green Belt allocations, exceptional circumstances tests

The Agency responded to the City Council’s Green Belt Options consultation of late 2012 indicating a preference for sites located near to public transport facilities. Initial consideration of traffic impacts indicated likely impacts at M6 junction 5 and M42 junction 9 from all of the four potential sites then under consideration. The Agency at this point noted the additional work conducted by the City Council to assess wider environmental and sustainability issues which led to the selection of sites at Langley and Peddimore.

As all the sites then under consideration had potential impacts on the Strategic Road Network it was essential to ensure that the site’s were deliverable in the context of the Agency’s approach to managing the SRN, with mitigation being required to be identified as Plan making process progressed.

As such, the Agency is content that the question of transport has been considered by the City Council in terms of the Green Belt proposals. In terms of the ‘exceptional circumstances’ test the Agency consider this to be a matter for wider land-use planning considerations beyond its remit to manage the SRN.

The question of transport evidence and adequate justification

Having assessed the need for evidence of SRN traffic impacts to be assessed, the Agency in conjunction with the City Council and the neighbouring transport authorities of Warwickshire and Staffordshire County Councils commissioned in March 2014 a detailed assessment of the impact of the proposed Green Belt sustainable urban extension allocations north-east of Sutton Coldfield. This assessment was designed to test the implications of the proposed site allocations on the operation of M42 Junction 9. A mutually agreed ‘S-Paramics’ micro-simulation traffic model identified the need for interventions to be made at M42 Junction 9 and on surrounding roads to mitigate the traffic impact of the proposed land-use allocations. The following models were developed:

- 2014 base model representing current SRN and surrounding local network conditions at M42 Junction 9

- 2032 future year model – do minimum: with no BDP growth
- 2032 future year model – do something: with BDP growth – traffic distribution taken from the West Midlands 'PRISM' 2012 transport model
- 2032 future year model – do something + mitigation of BDP growth traffic impacts

The identified mitigation scheme has been included in the submitted Infrastructure Delivery Plan.

The operation of M6 Junction 5 in respect of the Green Belt site allocations was raised by the Agency as a potential issue at the Green Belt Options consultation. The delivery by the City Council of the committed 'Chester Road Enhancement Scheme' provides the Agency with sufficient comfort that M6 Junction 5 will continue to operate satisfactorily with the Plan's proposed level of growth.

As such, the Agency is content that the SRN traffic impacts from the Green Belt site allocations in the submitted Plan north-east of Sutton Coldfield are acceptable in terms of SRN traffic impact when accompanied by the identified mitigation measures.

Additional Changes to the Green Belt Boundary

The Agency has assessed in detail the SRN impacts of submitted Plan Green Belt allocations. The mitigation proposed at M42 Junction 9 is specifically tailored to the mitigation of the submitted Plan's land allocations. The Agency has made no transport analysis of any non-plan site allocation proposals and has received no approaches from developers in this regard with the exception of parties with interests in sites adjacent to the Birmingham City boundary in North Warwickshire.

The Agency will be pleased to assist supporting developers in consideration of their aspirations through its protocols for engagement with local authorities and developers in the plan making and planning application processes (December 2012).

Matter F: Duty to Co-operate

The Agency has engaged with the City Council officers responsible for developing the Plan and the supporting transport evidence on an ongoing basis for the previous 18 months.

The Agency has responded to the Green Belt Options Consultation of late 2012 and Pre-Submission Version of the Birmingham Development Plan consultation in February 2014 and has continued to meet on a regular basis with City Council officers pre- and post- submission of the Plan.

This collaborative working between City Council officers and the Agency has led to the commissioning of a number of pieces of technical assessment to support the Plan's transport related evidence base. The detail of the analysis of the transport implications of the proposed Green Belt extensions in respect of the Agency's road network has been discussed fully above.

On the basis of the above observations we consider that the Council has satisfied the Duty to Cooperate in respect of the Agency.

Summary

The Agency is generally supportive of the Plan's intention to seek economic growth and social renewal in Birmingham.

In respect of Matter E, the Agency is satisfied that the transport evidence related to the Plan's Green Belt allocations has been 'positively prepared', is effective in terms of identifying deliverable mitigation and is consistent with national transport policy as stated in DfT Circular 02/2013.

The Agency is content that the City Council has satisfied the 'Duty to Cooperate' test insofar as it applies to the Agency.

Please feel free to contact me on the details above if you wish to discuss this response in more detail.

Yours sincerely



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