

Our ref: NWBC Local Plan
Your ref:

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Via Email: kerrytrueman@northwarks.gov.uk

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Dear Kerry,

North Warwickshire Borough Council Local Plan

I write with reference to the recent submission made by Hodgetts Estates in support of a Main Modification proposing a reserved site allocation for a Motorway Service Area (MSA) in the event that HS2 Phase 2b comes forward during the plan period. The documents to which I refer are:

- A Statement of Common Ground between Hodgetts Estates, Moto Hospitality LTD and the Road Haulage Association (document ref SoCG.04 M9),
- A plan (4623-CA-00-XX-DR-A-01053-Reserved Motorway Service Area 1-PL2) (document ref SoCG.04 M9a),
- A letter submitted from the Road Haulage Association (RHA) to the North Warwickshire Local Plan Examination, regarding the provision of HGV parking and facilities at M42 J10 (document ref SoCG.04 M9b),
- A Letter from the DfT and Department of Housing Communities and Local Government ('DHCLG'), dated 18 May 2018 (document ref PS.M9.24h); and
- A Written Statement to Parliament from DfT and Jesse Norman MP (dated 21 May 2018), which outlines work being done to improve on the current Operation Stack arrangements and measures being taken to tackle fly parking (document ref PS.M9.24i).

This information has been reviewed and I have outlined Highways England's position below.

Given the information available at this time it is our view that it is not appropriate for a specific MSA site to be allocated within the emerging North Warwickshire Local Plan. This would appear to be premature as it would be made without a suitable evidence base.

Although it is acknowledged that the permanent removal of Tamworth Services at M42 J10 would increase the distance between service areas on the motorway and trunk road network in the area, it is considered that the potential impact has not been sufficiently evidenced such that it fully demonstrates a need for a direct replacement has arisen. This is particularly the case in the context of two concurrent planning applications for such facilities being considered by Solihull Council on the M42 to the south and given that north of Junction 11 the M42 route becomes the A42.

As you are aware, there is a lack of certainty surrounding the announcement of the HS2 Phase 2b route with the hybrid bill due to be deposited with Parliament in early 2020. Only once this occurs will clarity be provided on the way in which HS2 intends to deal with the existing MSA and options might include:

1. HS2 providing an alternative MSA;
2. HS2 compensating Moto for the loss of the current MSA; or
3. HS2 providing a suitable engineering solution with a retained MSA.

Paragraph 4.3 of the Statement of Common Ground provided suggests that much of the M42 to the north and south of Junction 10 is 'blighted' (term used in the Hodgetts/Moto/Road Haulage Association documentation) by HS2 and Greenbelt, although it is noted that HS2 Phase 2b is currently proposed to route in close proximity to the M42 mainline. As indicated above, a position cannot be taken based on this information until such time the route and required land take is confirmed.

It is not however for Highways England to determine where new MSAs should be proposed. We are a statutory consultee within the planning system, with Department for Transport Circular 02/2013 Annex B making it clear that access to each site proposed will be considered on its own merits. This seeks to ensure that any such proposal does not compromise the safe and efficient operation of the Strategic Road Network.

With regards to the allocation as proposed by Hodgetts Estates we do have initial concerns over how this site would be accessed and we consider that an allocation for a new MSA at this location has not been demonstrated as deliverable. Given the geometry of the roundabout the construction of a seventh arm into an MSA in compliance with Design Manual for Roads and Bridges (DMRB) standards may be difficult. Direct access from the A5 would also be difficult to deliver and may be contrary to DfT Circular 02/2013 as Para B11 outlines that Highways England should not support proposals which generate an increase in trip mileage and could become destinations in their own right.

In light of current uncertainties it is our view that it may be more appropriate for a Main Modification which outlines a policy to explore potential sites available for an MSA. This would enable investigative site selection work to be undertaken to ensure due process is followed regarding any alternative proposals. Alternatively, the point of the next plan review (potentially before 2023) may be a more appropriate time to allocate an MSA

site (if necessary) as it is expected that there would be more clarity surrounding HS2 Phase 2b and its implications for the existing site.

We would welcome continued engagement on this matter. In the meantime, please do not hesitate to contact me should you have any queries.

Yours Sincerely,



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CC: Dorothy Barratt – North Warwickshire Borough Council