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LAND SOUTH OF FILLONGLEY ROAD, MERIDEN:

TRANSPORT ASSESSMENT AUDIT REVIEW

Meriden Parish Council

SYSTRA

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Active Travel England (ATE). Is an executive agency of the UK Department for Transport created to make walking, wheeling, and cycling the preferred choice for everyday travel. Its core objective is to ensure 50% of local journeys in towns and cities are walked, wheeled or cycled by 2030. The agency is also a statutory consultee on major residential site planning applications being in excess of 150 dwellings.

Local Transport Note 1/20 (LTN 1/20). Is the UK government's official guidance for designing high-quality cycle infrastructure. It provides local authorities with core design principles – *coherent, direct, safe, comfortable and attractive* – to build protected networks for all ages.

Design Manual for Roads & Bridges (DMRB). Is a comprehensive suite of documents that defines the requirements and provides advice for the design, assessment, and operation of motorways and all-purpose trunk roads in the UK. While developed principally for major trunk roads, local highway authorities often use it as a basis for other road types, applying professional judgment to adapt the standards as necessary and being typically applied to high traffic, high speed routes.

Manual for Streets (MfS). Manual for streets is a national design standard authored by the Department for Transport (DfT) that explains how to design, construct, adopt and maintain new and existing residential streets. It provides guidance for practitioners involved in the planning, design, provision and approval of new streets and modifications to existing ones. It aims to increase the quality of life through good design which creates more people-oriented streets. Although the detailed guidance in the document applies mainly to residential streets, the overall design principles apply to all streets within urban areas.

National Planning Policy Framework (NPPF). Sets out the National UK Government's planning policies for England and is intended to guide decisions so that development is delivered in a sustainable way. In transport terms it requires planning decisions to promote sustainable travel, prioritise walking, cycling and public transport, ensure that safe and suitable access can be achieved for all users, and avoid development that would result in an unacceptable impact on highway safety or severe residual cumulative impacts on the road network.

MCC. MCCs or Manual Classified Count(s) use manual technology to record traffic movements at a junction which are then split into specific vehicle classifications, over a set time-period.

ATC. ATCs or Automated Traffic Counts use various sensor technologies to record information such as vehicle volume, speed, and classification over a specific period, typically 24/7 for a week or longer.

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1. INTRODUCTION

1.1.1 Meriden Parish Council has commissioned SYSTRA to carry out an audit review of the Transport Assessment and associated technical transport evidence prepared by PJA in support of the recently submitted planning application (Ref: PL/2026/00900/PPOL). The application relates to a proposed residential development of up to 185 dwellings on land to the south of Fillongley Road, Meriden, Solihull, hereafter referred to as the Site.

1.1.2 The development is described as follows:

"Outline planning application for residential development of up to 185 dwellings (Use Class C3), creation of associated vehicular and pedestrian/cycle access off Fillongley Road, ecological enhancements, parking, landscaping, drainage features, open space and all other associated works/infrastructure, with all matters reserved except vehicular access off Fillongley Road".

1.1.3 In this technical note, SYSTRA identifies the principal concerns, risks and issues arising from a review of the Site's transportation and highways proposals, based on the Site details and assumptions currently presented in the applicants Transport Assessment (report ref: 09214-R-02-Transport Assessment dated February 2026). Henceforth this report will be referred to as the "Transport Assessment".

1.1.4 The purpose of this note is to provide a clear and objective appraisal of whether the transport case submitted in support of the development is robust, reasonable and aligned with relevant policy and technical standards.

1.1.5 In overall terms, this review considers whether the submitted evidence demonstrates that the Site is located in a suitably accessible position, whether safe and suitable access can be achieved for all users, and whether the transport effects of the development have been assessed in a sufficiently transparent and robust manner. Where information is incomplete, unclear or unsupported by evidence, the report identifies the further work necessary to enable the proposals to be properly tested against the relevant policy and technical requirements.

1.1.6 The current application Site has no present status within the adopted Solihull Local Plan which guides major development decisions and policy within the district and therefore has no previous consideration in planning terms insofar as it being considered a suitable sustainable Site on ground of highways and transport accessibility.

1.2 Revised National Planning Policy Framework (NPPF) Adoption Status – August 2026

1.2.1 On 17 August 2026, the Government published the latest revision to the National Planning Policy Framework (*NPPF*). This technical note has been prepared with regards to the updated national planning policy context and reviews the proposed development Site against the relevant provisions of the revised NPPF. Specifically in respect to the following updated national decision-making policies:

- S3-S5 on the principle of development and sustainable development,
- DM1-DM3 on information and decision-making,
- TR3-TR6 on sustainable locations, design, parking and transport impacts,
- DP3 on design,
- HC4 on public health benefits,
- P3 and P5 on living conditions, safety and public protection.

1.2.2 It is important to note that, as the proposed Site does not benefit from any allocation or other form of development plan status within the adopted Solihull Local Plan, these relevant national decision-making policies in the revised NPPF are a material consideration of direct

importance in determining the acceptability of the Site proposals. As confirmed within the document, planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise, and the Framework makes clear that the national decision-making policies it contains are themselves a material consideration in decision-making.

1.2.3 An important distinction within the latest version of the NPPF is a presumption in favour of developments that sit within existing settlements, with 'settlements' being defined as per Annex B as follows:

"Includes cities, towns, villages and other predominantly built-up areas, including land which is allocated or has permission for development which will form part of the built-up area once the development is complete. This includes areas defined as a settlement in the 112 development plan (whether using defined settlement boundaries or equivalent terms, or criteria for identifying settlement extents where boundaries have yet to be defined). Settlements do not include hamlets and scattered groups of houses located outside predominantly built-up areas, unless specifically defined as a settlement in the development plan. For the purpose of this Framework they also exclude villages which lie within and are defined as part of the Green Belt in the development plan".

1.2.4 For development sites that currently do fall within settlements, Policy S4 is applied which states that they *"should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework"*. In practical terms, this means that although there is a clear presumption in favour of development within settlements, proposals must still be tested against the relevant national decision-making policies before a final planning judgement is reached.

1.2.5 It is also important to note that the revised NPPF requires the national decision-making policies to be read as a whole. Accordingly, whether the Site is treated as falling within or outside a settlement does not displace the need to assess the proposals against the wider transport, design, health and public protection policies of the Framework. In particular, Policies TR3 to TR6 are of direct relevance, as they require development to be located in sustainable locations, to offer a genuine choice of transport modes, and to ensure that transport impacts are properly assessed and mitigated.

1.2.6 This is of added significance where Green Belt considerations may arise, because Policy GB7 of the revised Framework provides that development on grey belt land will only be regarded as not inappropriate where, amongst other things, it would be in a *"sustainable location, with particular reference to policy TR3"*. That policy linkage underlines the importance of robust transport evidence in determining whether the Site is suitable for development under the revised national policy framework.

1.2.7 For sites that fall outside of existing development boundaries, the requirements of Policy S5 are applied which allows for approval of developments that only meet certain characteristics. This includes mixed use and residential sites that would:

i. "Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B[1]);

ii. Be physically well-related to the station or the settlement within which the station is located;

[1] *Should be considered to be around 800 metres, or around 10 minutes' walk time if topography, route availability and quality or physical barriers would prevent or discourage walking from up to 800 metres away.*

iii. *iii. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and iv. Not prejudice any proposals for long-term comprehensive development in the same location".*

1.2.8 It is noted that the proposed Site is situated on the eastern edge of Meriden and for the purposes of this note, is assumed that the proposed Site would fall under the planning policy criteria of S5 on the grounds that:

1. The Site sits entirely outside of the Village Boundary area under Figure 5 as referenced under Policy H1 under the adopted Meriden Neighbourhood Development Plan;

2. The Site does not otherwise have any status as a proposed strategic housing location within the adopted Solihull Local Plan.

1.2.9 Notwithstanding, as specialist transport consultants, SYSTRA does not provide definitive planning policy advice. Accordingly, it is recommended that the Parish Council seeks specialist planning advice to confirm whether the proposed Site should properly be treated as being within or outside a settlement for the purposes of the revised NPPF.

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2. SITE ACCESSIBILITY BY SUSTAINABLE TRANSPORT

2.1.1 This section reviews the accessibility of the application Site by sustainable modes of transport, with particular regard to walking, cycling and public transport. It considers the extent to which the Site can be accessed by non-car modes in practice, and whether the opportunities identified by the applicant are sufficient to support the level of accessibility required by relevant national and local planning policies.

2.1.2 The key sections of the Transport Assessment that has informed this section of the review is related to the information presented within Chapters 3 'Baseline Transport Conditions' and 4 'Development Proposals' of the report.

2.1.3 In this respect, the chapter assesses the importance of Site accessibility in determining whether the proposed development can reasonably be regarded as being located in a sustainable and policy-compliant location.

2.2 Accessibility to key local services

2.2.1 The Transport Assessment ("TA") states that the Site lies within a 20-minute walk of a number of local amenities and presents corresponding distances in Table 3-4 of the TA, reproduced as Table 1 below.

Table 1. Local Amenity Distances

Amenity Name	Amenity Type	Approximate Distance from Site Access (m)	Walking Time (mins)	Within IHT standard	Cycling Time (mins)
Meriden C of E Primary School	Primary School	500m	6	Desirable	2
Budgens Meriden	Convenience Store	850m	10	Maximum	3
Meriden Library	Library	850m	10	Acceptable	3
Crest Pharmacy	Pharmacy	900m	11	Maximum	3
Co-Operative Food	Convenience Store	900m	11	Maximum	3
Balsall Common & Meriden GP	GP	1.2km	14	Maximum	4
Meriden Village Hall	Community Hall	1.2km	14	Maximum	4

(Source: Table 3-4 of TA – Local Amenities)

2.2.2 In local policy terms, this issue is relevant to Policy P7 "Accessibility and Ease of Access", of the Solihull Local Plan which expects proposed housing development to be within 800m walking distance of a primary school, doctor's surgery and food shop. The supporting text to Policy P7 of the Solihull Local Plan also makes clear that accessibility is not simply a matter of straight-line or theoretical distance, but of realistic opportunities to reach services and facilities by sustainable modes.

2.2.3 In national policy terms under the latest version of the NPPF, this issue is relevant to the following policies:

- **TR3:** development generating significant movement should be in locations that are sustainable and offer a genuine choice of transport modes unless the nature of the development makes that impractical.
- **CC2:** development should support sustainable movement and good access to facilities to limit the need to travel.
- **HC4:** substantial weight should be given to development that promotes good health, but by implication poor accessibility to daily needs weakens any claim that the scheme does so.

- **DP3:** movement should provide good connections to the wider settlement and prioritise walking, wheeling, cycling and public transport.

2.2.4 The distances presented within the Transport Assessment reference approximate 500m walk-distances to Meriden C of E Primary School, 850–900m to convenience shopping, the library and pharmacy, and approximately 1.2km to the local GP surgery and village hall. Under the terms of the relevant Local Plan policy, the Site is not to be considered as accessible by walking to these services, with only the local primary school being within the recognised 800m desirable walk distance.

2.2.5 Furthermore, it is also noted that the quoted distances as set out within Table 3-4 of the Transport Assessment are misleading insofar as they underestimate the walking distances that will be experienced by on-Site residents. This is since the measured distances are taken at the point at which the proposed primary access connects onto Fillongley Road rather than from within the development itself.

2.2.6 The measurement of walk distances from door to door as opposed to as undertaken from the point of access into the Site has strong support under terms of existing policy including the latest version of NPPF which under Annex B of the document in consideration of reasonable walking distances states the following:

"Where a reasonable walking distance is required to be calculated when applying policies S5(1)(h), L3(2)(c) and GB7(1)(h), and only part of the site falls within the reasonable walking distance, those sub-paragraphs of policies S5, L3 and GB7 only apply to the area of the site within that reasonable walking distance".

2.2.7 If distances are instead measured from the approximate centre of the development, near the proposed community green space, this would add around 200m to 500m to the walking distance depending upon where dwellings are located. On that basis, a number of destinations identified in the TA as being within, or close to, accepted walking thresholds would in practice fall materially beyond them.

2.2.8 An example in point is the walk distance to the local Primary School which is located on the northern side of the Site off Fillongley Road. Residential properties located within the southern portion of the development Site will have considerably longer distances to walk to the school, placing many on-Site dwellings well outside of the stated 800 metres acceptable walking distance as stated by Local Plan policy criteria.

2.2.9 Policy P18 of the Solihull Local Plan supports development that contributes to: *"a high quality, safe and convenient walking and cycling network"* and enables healthier lifestyles, while the supporting text to the Local Plan acknowledges that *"much of the Rural Area suffers from relatively low levels of connectivity and accessibility, particularly by public transport".*

2.2.10 In that context, the Site's failure to achieve good accessibility to key day-to-day services is not merely a technical shortfall against Local Plan Policy P7 and wider NPPF policies, but also runs counter to wider local authority objectives of promoting accessible, healthy and sustainable communities.

2.3 Suitability of active travel routes - Cycling

2.3.1 The submitted Transport Assessment identifies broad route connections from the Site to key day-to-day destinations, including the school, bus stops, local centre, GP surgery and village hall. It therefore recognises the principal destinations that any active travel strategy for the development must serve.

2.3.2 However, the assessment appears to focus primarily on geographic connectivity rather than the quality and suitability of the routes themselves. In particular, it does not appear to apply the more detailed assessment approach set out in the Active Travel England Route Check User

Manual[2] and associated audit tools, which consider routes against a range of criteria including safety, accessibility, comfort, directness, attractiveness and cohesion.

2.3.3 In relation to cycling, the assessment is limited largely to a 10km isochrone showing the area that the applicant proposes is theoretically reachable from the Site by bicycle. While this provides a broad indication of catchment reach, it does not demonstrate that the routes available are suitable, safe or attractive for everyday cycling.

2.3.4 The Transport Assessment itself acknowledges this limitation, noting that the isochrone does not reflect the quality of infrastructure and that some routes may not be suitable for all users because of traffic speed and volume. This is an important qualification, as theoretical accessibility is not the same as providing cycle routes that are realistically usable by a wide range of people.

2.3.5 The traffic conditions reported in Chapter 3 of the Transport Assessment reinforce that concern. Fillongley Road is stated to carry approximately 6,500 vehicles per day, with 85th percentile speeds of around 32mph eastbound and 34mph westbound in one route audit, and 27mph on another section closer to the school. These are not insignificant conditions for cyclists, particularly where there is little or no dedicated protection from motor traffic.

2.3.6 No raw speed survey data or detailed traffic count data appears to have been submitted in the appendices to allow those figures to be independently verified in full. Even so, on the applicant's own evidence, the reported 85th percentile speeds on parts of Fillongley Road exceed the posted speed limit. That indicates that speeding traffic is an existing characteristic of the route and is a material consideration when assessing its suitability for cycle travel.

2.3.7 This concern is also consistent with wider local evidence. Speeding on Fillongley Road has been the subject of longstanding community concern, we understand from correspondence received by Meriden Parish Council that a Freedom of Information (FOI) request to the West Midlands Police and Crime Commissioner was issued and reportedly identified 1,800 speeding detections over a six-month period between January and June 2025 on the section between Alspath Road and the A45 overpass, namely the section passing the proposed Site frontage. This lends further support to the view that this is a route with persistent speed-related traffic issues.

2.3.8 This concern is reinforced by a review using the CycleStreets[3] journey planning platform, which classifies adjacent sections of Fillongley Road and Main Road through the village as *"very hostile"* for cyclists and identifies them as containing *"very busy sections"*. Although this is not a substitute for a formal audit, it is consistent with the broader concern that the practical cycling environment is materially less suitable than the isochrone mapping implies.

2.3.9 This concern is also directly reflected in current national and local policy expectations as follows:

- **Policy P15** of the Solihull Local Plan requires development to create "attractive, safe, active, legible and uncluttered streets and public spaces which are accessible, easily maintained and encourage walking and cycling", while Policy P18 supports proposals that "contribute to the development of a high quality, safe and convenient walking and cycling network". In the absence of protected or otherwise demonstrably suitable cycle connections from the Site to key destinations, the current evidence does not show alignment with those policy requirements.

- **Policy TR3** of the NPPF states that development proposals should be located so that they can *"support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure"*. In particular, proposals that are likely to generate a significant amount of movement

[2] www.gov.uk/government/publications/active-travel-england-scheme-review-tools
[3] www.cyclestreets.net

should be in locations that *"offer a genuine choice of transport modes for residents and users"*. On the evidence currently submitted, that has not been robustly demonstrated in relation to everyday cycling from the Site.

- **Policy TR4** of the NPPF, requires development proposals to *"give priority first to walking, wheeling and cycle movements, both within the scheme and with neighbouring areas*" and to incorporate features that support that prioritisation. The same policy also requires the arrangement of streets and routes to help create places that are *"safe, inclusive and attractive for all users".*

- **Policy P5** of the NPPF requires development proposals to *"anticipate and address possible malicious threats and other hazards"* in relation to occupiers and users by identifying *"potential safety risks and proportionate mitigation opportunities which can be addressed through the design of the scheme"*. While this policy is framed broadly, it is relevant here insofar as the cycling environment on the principal routes from the Site appears to be affected by persistent speed-related traffic conditions. The evidence referred to in this note, including the applicant's own reported traffic conditions and the additional local information regarding speeding detections, indicates that safety risks affecting cycle travel have not yet been adequately addressed through either route design or mitigation.

2.3.10 This is also relevant in the context of LTN 1/20 Cycle Infrastructure Design4, which makes clear that painted or on-carriageway cycle lanes alone are generally insufficient on busier or faster roads. The cycle lane provision identified on Main Road is therefore not, in itself, enough to show that the route is suitable for a broad range of users. The position is weaker still on Fillongley Road, where there is no cycle lane provision at all. As a result, the evidence does not robustly demonstrate that the Site is served by cycle routes of a quality that would support safe, attractive and inclusive everyday use.

2.3.11 Taken altogether, having regard to the traffic conditions reported in the Transport Assessment, the absence of any meaningful cycle provision on Fillongley Road, and the limited value of isochrone mapping as a measure of route quality, the current evidence does not demonstrate that the Site is connected to key destinations by cycling routes that would meet the expectations of LTN 1/20 or Active Travel England best practice.

2.3.12 Assuming also that the Site is to be assessed as lying outside of an existing settlement, Policy S5 of the NPPF requires consideration of whether development would promote sustainable patterns of movement stating that, outside settlements, development which does not fall within the identified categories should only be approved in exceptional circumstances where the benefits would "*substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement*".

2.3.13 In the absence of evidence showing that key destinations are connected by cycle routes that are safe, coherent, attractive and realistically usable for everyday journeys, the current material does not demonstrate that the proposal would satisfy that requirement.

2.4 Suitability of active travel routes - Walking

2.4.1 The Transport Assessment provides a more detailed account of the existing walking environment and, in doing so, identifies a number of clear deficiencies in the local pedestrian network. These include inconsistent and incomplete footway provision, pinch points caused by reduced footway widths and parked vehicle obstruction, particularly along Fillongley Road and parts of Leys Lane; the absence of a dedicated crossing point on Fillongley Road; the lack of controlled crossings on parts of Main Road close to key destinations such as the GP surgery and village hall; and reliance on a Public Right of Way connection to Main Road that is described as suitable only for seasonal use because it is unlit and unpaved.

[4] www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120

2.4.2 In response, the applicant proposes a new zebra crossing on Fillongley Road between the Site access and Leys Lane. This would provide some improvement to one key pedestrian desire line, particularly for movements towards the primary school. However, no wider package of measures is proposed to address the remaining deficiencies identified in the Transport Assessment. As a result, the proposed crossing appears to operate as a single mitigation measure rather than as part of a coherent walking strategy. In isolation, it does little to resolve the broader problems of route continuity, crossing availability, surface quality, accessibility and year-round usability that affect journeys to and from the Site.

2.4.3 Given that no further interventions are proposed to deal with the other on-route deficiencies the proposed crossing in isolation will offer little to support accessibility to and from the development Site and should be understood as a partial intervention within a wider network that currently does not appear to provide a consistently inclusive, coherent or all-weather active travel offer which runs contrary to the network-planning principles as set out both within Active Travel England best practice guidelines.

2.4.4 This is significant because the wider walking network, as described in the Transport Assessment, does not presently appear to offer a consistently inclusive, coherent or all-weather pedestrian environment. That is difficult to reconcile with the network-planning principles reflected in Active Travel England guidance, which place emphasis not simply on isolated infrastructure improvements, but on routes that work together as part of a connected, legible and accessible whole.

2.4.5 In particular, the issues identified in the Transport Assessment raise concerns in relation to several of the Active Travel England Route Check policy principles, including the following:

- **PO03** which asks whether the route feels direct, logical and intuitive for all users;
- **PO04** which addresses whether surfaces are suitable for all users;
- **PO05** which considers whether appropriate lighting is provided; and
- **PO06** which asks whether the route joins together as part of a holistic and connected network.

2.4.6 On that basis, the applicant should reconsider whether a broader package of pedestrian improvements is required if the scheme is to demonstrate proper alignment with Active Travel England best practice. Without further intervention, the evidence does not show that the Site will be connected to key local destinations by walking routes that are sufficiently direct, accessible, coherent and reliable throughout the year.

2.4.7 Accordingly, the current Transport Assessment does not yet provide sufficient evidence that the Site would be served by walking routes of a standard consistent with Active Travel England expectations or with the design principles and quality thresholds relevant to inclusive active travel provision. A broader package of improvements would be needed to address the shortcomings already acknowledged in the Transport Assessment, including route continuity, crossing provision, surface quality, lighting and year-round usability.

2.4.8 The identified shortcomings are also relevant to the design and health-related policies of the development plan as follows:

- **Policy P15** requires development to create places that are *"safe, active, legible and uncluttered"* and which "encourage walking and cycling".
- **Policy P18** supports proposals that provide opportunities for physical activity and that *"contribute to a high quality, attractive and safe public realm…to encourage social interaction and facilitate movement on foot and by cycle".*

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2.4.9 Where pedestrian routes are discontinuous, poorly lit, seasonally unreliable or constrained by parked vehicles and narrow widths, the development cannot readily be said to provide the high quality and inclusive pedestrian environment anticipated by those policies.

2.5 Access to public transport services

2.5.1 Table 3-1 of the Transport Assessment identifies bus services 82 and X1 and states that the service frequencies and operating hours shown are accurate as of November 2025. However, paragraph 3.4.9 explains that the public transport accessibility mapping was prepared using timetable data obtained from BODS in June 2025.

2.5.2 This gives rise to an evident inconsistency in the dating of the evidence base. The accessibility mapping appears to rely on timetable information from June 2025, whereas the service summary in Table 3-1 is said to reflect conditions as of November 2025. While this does not in itself undermine the entire public transport assessment, it does indicate that the analysis is not drawn from a single consistent point in time.

2.5.3 Notwithstanding that inconsistency, an independent review of current operator and timetable information suggests that the service data presented in the TA is broadly representative of existing levels of provision. The Stagecoach website indicates that service 82 operates broadly on an hourly basis, consistent with the Transport Assessments findings. The timetable for service X1 also suggests a variable service frequency, generally in the range of approximately 15 to 40 minutes in both directions, which is likewise broadly consistent with the figures reported.

2.5.4 On that basis, the service frequencies set out in Table 3-1 appear reasonable, even if the dating of the underlying evidence should have been presented more clearly and consistently.

2.5.5 The Transport Assessment states that the nearest bus stops to the Site are located approximately 700 metres away at the junction of Main Road and Leyes Lane. As with the distances quoted to surrounding off-Site facilities, this measurement appears to have been taken from the point at which the proposed primary access meets Fillongley Road, rather than from a representative central point within the development itself. The distances presented therefore understate the true walking distance for future residents and are liable to give a misleading impression of the Site's accessibility.

2.5.6 In any event, both the quoted distance and the likely actual walking distance from the development to the nearest bus stops exceed the maximum acceptable walking distance set out in Solihull Local Plan Policy P7, which states that proposed housing development should be within 400 metres walking distance of a bus stop.

2.5.7 The nearest rail station, Hampton-in-Arden, is located approximately 4.5 kilometres from the Site. This is substantially beyond the distance that would ordinarily be regarded as a *"reasonable walking distance"* under requirements as set out under Policy S5 of the NPPF, which states that residential and mixed-use development outside settlements should, "*be within reasonable walking distance of a well-connected station*". Which under the clarifications provided under Annex B of the same document is considered to be "*around 800 metres, or around 10 minutes' walk time if topography, route availability and quality or physical barriers would prevent or discourage walking from up to 800 metres away*".

2.5.8 This position is also consistent with Solihull Local Plan Policy P7, which states that proposed housing development *"should be within 800 metres walking distance of a rail station, unless justified by local circumstances"*. On that basis, the Site does not satisfy the station accessibility criteria under either national or local policy considerations.

2.5.9 Although Hampton-in-Arden station lies just within the 5-kilometre distance often cited as an upper limit for commuting by bicycle, the quality and safety of the route materially diminish its practical attractiveness. The route requires travel along Fillongley Road, then along the higher-speed section of the B4102 Hampton Lane, which is subject to a 50mph speed limit,

before crossing the A452 Kenilworth Road. In practical terms, that route is unlikely to be attractive or suitable for all but the more experienced and confident cyclists. The most recent five-year collision data also indicates existing highway safety concerns, including a recorded fatal collision on Hampton Lane and a concentration of collisions, including serious incidents, at the A452/B4102 roundabout.

2.5.10 Hampton-in-Arden station can also be accessed by bus using service 82. However, as noted above, this is an irregular weekday service, operating broadly hourly at peak times, and it serves bus stops that are themselves located beyond the recommended 400-metre walking distance from the Site.

2.5.11 Taken together, the evidence indicates that the Site is not well served by public transport in a way that satisfies the expectations of the current national policy framework as per the NPPF specifically under:

- **Policy CC2** requires development proposals to *"Accord with policies TR3 and TR4 so that sustainable patterns of movement are prioritised, opportunities are taken to improve walking, wheeling, cycling and public transport"* and requires proposals to *"Support good access to facilities in order to limit the need to travel";* and

- **Policy TR3** which requires that development generating significant movement should be in locations that *"offer a genuine choice of transport modes for residents and users".*

2.5.12 The public transport offer is limited both in spatial and practical terms. Bus stops are beyond the distance likely to be regarded as conveniently walkable for day-to-day use; the nearest rail station is substantially beyond the NPPF's stated reasonable walking distance threshold; and the alternative means of reaching the station by cycle or bus are constrained by route quality, safety concerns and limited convenience. In these circumstances, the Site cannot reasonably be described as well connected by sustainable public transport modes.

2.5.13 Accordingly, the current evidence does not robustly demonstrate compliance with the requirements of NPPF Policy S5(1)(h), nor with the wider expectations of Policies TR3, TR4, CC2 and DP3 which seek to ensure that development is located where sustainable movement can genuinely be prioritised and where good connections to the wider settlement and public transport network are available. The likely consequence is that future occupiers would remain materially reliant on the private car for many day-to-day journeys.

2.6 Summary and Conclusions

2.6.1 Overall, the evidence indicates that the application Site does not occupy a suitably accessible or policy-compliant location in sustainable transport terms.

2.6.2 In relation to Solihull Local Plan Policy P7, the Site fails to meet key accessibility expectations for day-to-day services and public transport, with only the primary school falling within the relevant walking threshold with even that position being overstated by the applicant's reliance on distances measured from the Site access rather than from within the development itself.

2.6.3 Convenience shopping, the library, pharmacy, GP surgery and village hall are all beyond the policy's expected walking distances for many future residents, while the nearest bus stops are located beyond the 400m walking distance standard and the nearest rail station is approximately 4.5km away, far beyond the 800m walk distance threshold as recommended within both local and national policy guidelines assuming that the site is reviewed under the terms of NPPF Policy S5 as being outside of an existing settlement.

2.6.4 The evidence also fails to demonstrate that the Site is served by safe, direct, inclusive and attractive walking and cycling routes of the quality expected by current best practice, with the Transport Assessment itself identifying significant shortcomings in footway continuity,

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crossing provision, route quality, lighting, year-round usability and cycling conditions on Fillongley Road and surrounding roads.

2.6.5 Although limited mitigation is proposed, this does not amount to a coherent package capable of overcoming those wider deficiencies.

2.6.6 Taken together, the Site's reliance on private car travel would remain significant, and the current evidence does not demonstrate compliance with the accessibility and sustainable transport objectives of either the Solihull Local Plan or the NPPF.

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3. PROPOSED WORKS ON PUBLIC HIGHWAYS

3.1.1 This section considers whether the off-Site highway works and access arrangements proposed by the applicant are sufficient to provide a safe, suitable and policy-compliant means of access to the development for all users. In doing so, it reviews both the principal vehicular access and the proposed pedestrian crossing on Fillongley Road, with particular regard to their compliance with relevant design guidance, their response to existing highway conditions, and whether they amount to a robust package of mitigation capable of addressing the Site's identified accessibility and safety constraints.

3.1.2 The key sections of the Transport Assessment that has informed this section of the review is related to the information presented within Chapter 4 'Development Proposals' and supporting information contained within Appendix A (Proposed Site Layout) and Appendix D (Access Design Drawings and swept path analysis) of the report.

3.2 Proposed Site Access

3.2.1 The proposed primary vehicular access has been reviewed against the relevant design standards for this form of junction, including Manual for Streets (MfS) and the Solihull MBC Developers Design and Adoption Guide, to determine whether the scheme provides an acceptable and policy-compliant means of access.

3.2.2 The development proposes a single vehicular access in the form of a simple three-arm priority T-junction onto Fillongley Road. This is shown on drawing ref: 09214-PJA-AT-DR-0001 contained within Appendix D of the Transport Assessment.

3.2.3 Although the geometric form of the junction appears, in broad terms, to reflect the general principles of MfS, the evidence submitted is insufficient to demonstrate that the design has been robustly justified.

3.2.4 In particular, the proposed visibility splays are said to be based on recorded 85th percentile vehicle speeds that exceed the posted 30mph speed limit on Fillongley Road. While this is the correct design approach in principle, no detailed speed survey data has been provided to substantiate those figures. As a result, the applicant has failed to provide the necessary evidence to allow the visibility requirements, and therefore the adequacy of the junction design itself, to be properly checked and independently verified.

3.2.5 More importantly, the applicant's own evidence confirms that Fillongley Road is affected by an existing speeding problem. This is a significant safety concern. In the absence of frontage activity or other meaningful changes to the character of the road, there is no reason to conclude that vehicle speeds will reduce as a consequence of the development. The proposed access would therefore be introduced onto a road environment where excessive speeds are already an established characteristic. In those circumstances, additional off-Site speed reduction measures should not be regarded as optional; they are necessary if safe conditions are to be created for drivers, pedestrians and cyclists using the Site access. At present, no such traffic calming measures are proposed as part of the applicants' design for the junction.

3.2.6 The applicant has designated the Site access road as a *"residential street"* which is classified as per Solihull MBC Developers Design and Adoption Guide. However, this guide states that a residential street can be typically served via a single point of access, serving up to a maximum of 150 dwellings, and that an emergency access should also be considered.

3.2.7 That is not the case here. The scheme proposes up to 185 dwellings and therefore falls squarely within the category of a '*connecting street'* under the Council's own design guidance which states that for developments of between 150 and 300 dwellings, typically at least two vehicular points of access should be provided.

3.2.8 The current proposal plainly fails to meet these guidelines with the scheme having neither two full vehicular access points nor an emergency-only access. The proposed access strategy

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therefore directly conflicts with Solihull's adopted design guidance. On that basis, the access arrangements cannot be regarded as adequately justified, policy-compliant or acceptable in safety and design terms.

3.2.9 There is a specification in Solihull's guidance that stipulates that these are *"typical"* arrangements for such streets and as such the guidance wording implies that divergence from the standards is potentially acceptable in certain circumstances where supported by a clear and robust design rationale. Notwithstanding the above, the applicant within the supporting information available, has yet to prepare any such case or justification for the divergence from the design guidelines.

3.2.10 Of particular concern is the absence of any proposal for a separate emergency-only access, which ought to be carefully considered where a reduced street standard is proposed as the principal means of access. This is especially important given the policy expectation that development should maintain safe access for all users, including emergency and service vehicles which include the following extracts from the NPPF:

- **Policy TR4** requires development proposals to *"allow for the efficient delivery of goods, and ease of access by service and emergency vehicles"*, and

- **Policy P5** which requires proposals to *"anticipate and address possible malicious threats and other hazards"* by identifying *"potential safety risks and proportionate mitigation opportunities which can be addressed through the design of the scheme"*.

3.2.11 In the absence of a clear justification for relying on a lowered-standard residential street without a dedicated emergency access, it has not yet been demonstrated that the proposed access strategy would provide an appropriate level of resilience, safety and operational robustness over the lifetime of the development.

3.2.12 It is further noted that there is minimal provision for Cycling at the proposed Site access junction with the applicant's design philosophy as stated within the key of drawing ref: 09214-PJA-AT-DR-0001 suggesting that cycle connections are being dealt with from additional access point as part of the Site wider masterplan.

3.2.13 No details are currently provided in the main body of the Transport Assessment as to the location of the proposed cycle-only access to the Site. Based on the information as set out within the Design and Access statement however it is identified connecting to the existing Public Right of Way network along the eastern boundary of the Site. However, that route is presently unpaved and unlit and, in its current condition, is unlikely to provide a suitable or attractive route for cycling.

3.2.14 There is no indication within the current version of the masterplan drawings shown or within the main body of the text of the Transport Assessment that any enhancement to this route is proposed to address these issues, with the exception of a single statement within the separate Design and Access statement that suggests that the surface of the path will be upgraded to a gravel surface at its northern and southern ends. There is no mention of lighting upgrades to the route.

3.2.15 The intention to enhance the route to a gravel only path contravenes clear guidelines as set out under LTN 01/20 (Chapter 8) and ATE guidelines (Chapter 4) which concur that for routes within built up areas and anticipated for general year-round utility use (i.e. for all routes with the exception of leisure-orientated rural routes), a minimal standard of a smooth, firm sealed surface is necessary, and street lighting should be provided.

3.2.16 This is also relevant in the context of Policy TR4 and Policy DP3 of the NPPF:

- **Policy TR4** requires development proposals to incorporate *"appropriate features"* to support walking, wheeling and cycling, including *"adequately lit"* routes and requires the arrangement of streets and other routes to help create places that are *"safe,*

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inclusive and attractive for all users" and to meet the needs of *"disabled people, older people and children in relation to all modes of transport"*.

- **Policy DP3** requires public spaces and routes to be *"safe, secure, inclusive, and accessible for all ages and abilities"*.

3.2.17 A cycle and pedestrian connection that relies on an unpaved or gravelled, unlit Public Right of Way is unlikely to satisfy those policy expectations for a broad range of users, particularly where year-round accessibility, inclusive design and safe everyday utility travel are material considerations.

3.1 Proposed pedestrian crossing off Fillongley Road

3.1.1 The applicant proposes a new pedestrian crossing on Fillongley Road, immediately to the east of the junction with Leys Lane. Its principal purpose is to facilitate pedestrian movement between the Site and Meriden C of E Primary School by allowing users to cross between the southern and northern footways.

3.1.2 Drawing ref. *09214-PJA-AT-DR-0003*, contained within Appendix D of the Transport Assessment, indicates that the existing 20mph speed limit outside the school would be extended eastwards to include the section of road where the proposed crossing is to be located.

3.1.3 However, the drawing also shows the 20mph signing accompanied by a *"when lights show"* plate.

3.1.4 If the intention is that the lower speed limit would only apply during school pick-up and drop-off periods, then the measure would provide only part-time protection for a crossing that is intended to serve a wider range of pedestrian movements throughout the day. That would be wholly inadequate. The former school warning lights are understood to have been removed, and in any event such an arrangement would not be appropriate for a crossing serving a new residential development beyond the immediate school frontage. The applicant must therefore provide clear confirmation that the crossing would be supported by a permanent 20mph speed limit, rather than a conditional or time-limited restriction.

3.1.5 The existing 20mph limit near the school is reinforced by a '*give way to oncoming vehicles'* carriageway narrowing, which provides a physical traffic-calming feature and assists in securing lower vehicle speeds. No equivalent feature is proposed at the new eastern extent of the speed limit. As a result, there is a clear risk that vehicles would approach the proposed zebra crossing at speeds materially higher than 20mph, undermining both the effectiveness and safety of the crossing. A speed limit change without accompanying physical speed reduction measures is unlikely, in this context where traffic speeds are known to exceed the statutory speed restriction, to provide a sufficiently robust safety intervention.

3.1.6 The proposed crossing location also gives rise to specific operational and visibility concerns. It is positioned immediately east of the Leys Lane junction and near the access serving 115 Fillongley Road. This arrangement should not be assumed to be acceptable until such time that the applicant has demonstrated that the crossing would be fully visible to vehicles emerging from Leys Lane, and that its siting would not give rise to conflict with turning movements or driveway activity associated with the adjacent property. Until that is shown, the safety and suitability of the proposed crossing location remain in doubt.

3.1.7 Accordingly, the current proposals fail to demonstrate that the crossing would operate safely or effectively, particularly in the absence of certainty over a permanent 20mph limit and without supporting traffic-calming measures to secure lower approach speeds.

3.1.8 Furthermore, and as previously stated, the proposed crossing in isolation cannot be relied upon as a robust or comprehensive mitigation measure for the Site's wider pedestrian accessibility deficiencies and falls short of requirements as per Active Travel England

guidelines under PO06, which asks whether the route joins together as part of a holistic and connected network.

3.1.9 This holistic approach as advocated by Active Travel England is further supported by national decision-making policies as set out within the NPPF, specifically the following:

- **Policy TR3** that requires development proposals generating significant movement to be located and designed so as to support sustainable patterns of movement and to *"offer a genuine choice of transport modes for residents and users*".

- **Policy TR4** that requires proposals to *"give priority first to walking, wheeling and cycle movements, both within the scheme and with neighbouring areas",* and

- **Policy CC2** which requires development to accord with Policies TR3 and TR4 so that *"sustainable patterns of movement are prioritised"* and opportunities are taken to improve walking, wheeling, cycling and public transport.

3.1.10 Consequently, a single crossing, without a wider package addressing route continuity, surface quality, accessibility, lighting and network coherence, does not amount to a transport strategy in which walking is demonstrably prioritised across the full range of journeys future residents would be likely to make.

3.2 Summary and Conclusions

3.2.1 Overall, the off-Site highway and access proposals do not currently demonstrate that the development would provide safe and suitable access for all users, nor that they amount to a sufficiently robust mitigation package capable of addressing the Site's identified highway, accessibility and active travel constraints.

3.2.2 The shortcomings identified relate not only to matters of technical detail and evidential deficiency, but also to more fundamental concerns regarding the suitability of the access strategy, the absence of appropriate speed management, the lack of resilience in the vehicular access arrangements, and the failure to provide high quality walking and cycling connections.

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4. TRAFFIC MODELLING

4.1.1 This chapter reviews the junction capacity modelling undertaken by the applicant to assess the extent to which traffic generated by the proposed development is likely to affect the surrounding highway network. It considers both the methodology applied and the conclusions reached, informed by a detailed examination of the technical evidence submitted in support of the assessment.

4.1.2 The review also examines the assumptions and inputs that underpin the modelling, including the derivation of development traffic from TRICS and the way those trips have been distributed and assigned across the wider highway network. These matters are significant because they form the foundation of the junction capacity assessment and therefore directly influence the reliability of its findings.

4.1.3 A robust understanding of the development's traffic impact across the wider network is necessary in order to determine whether the proposal complies with relevant national and local transport policy. Specifically, Policy TR6 of the NPPF which states that development proposals should be refused where they would have a *"severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety"*, taking account of mitigation measures and wider network improvements.

4.1.4 That policy is reinforced by Policy TR3, which requires that any significant adverse impacts on the transport network or on highway safety should be mitigated to an acceptable degree using a vision-led approach.

4.1.5 Similarly, Policy P8 of the Solihull Local Plan seeks to ensure that development does not materially worsen congestion or highway safety conditions and that sustainable modes of travel are encouraged.

4.1.6 If taken at face value, the modelling results presented in Chapter 6 of the Transport Assessment appear to suggest that the proposal would accord with these policies, in that the forecast development traffic does not seem to materially worsen congestion at the off-Site junctions that have been assessed.

4.1.7 However, the Transport Assessment does not contain sufficient information to enable the modelling assumptions, inputs and outputs to be properly checked or independently verified. As a result, the accuracy of the modelling exercise, and the reliability of the conclusions drawn from it, cannot presently be accepted.

4.1.8 The need for this information is supported by the general decision-making provisions under Policy DM1 of the NPPF that states that development proposals should be supported by the *"minimum necessary information requirements to enable a decision"*. In turn, Policy TR6 requires development proposals likely to generate significant amounts of movement to be supported by a *transport statement or transport assessment* proportionate to the nature and scale of the development, so that the likely transport impacts can be *"assessed and monitored"*.

4.1.9 In this case, the omitted modelling inputs, survey data and validation material are plainly necessary to ensure that the transport impacts of the scheme can be properly understood, tested and monitored in accordance with those policies.

4.1.10 The further information currently absent from the assessment, and which will need to be provided by the applicant before the application can be properly evaluated against the policy tests referred to above, is identified s as follows:

1. **Full census-derived MSOA origin-destination outputs** should be provided, together with the routing assumptions applied to each movement, in order to determine whether the summary network flow diagrams in Appendix H of the Transport Assessment

accurately and reliably represent the distribution of development traffic across the highway network.

2. **Raw MCTC and ATC traffic count data** should be provided for each of the assessed junctions referred to in Section 6.3 of the Transport Assessment, so that it can be confirmed that the modelled flows have been robustly calibrated against observed traffic conditions and that the correct peak periods have been assessed.

3. **Details of any validation queue surveys** undertaken, or justification for their absence, should be provided in order to verify the base modelling outputs for each junction and to demonstrate that the models accurately reflect observed on-Site traffic conditions and driver behaviour.

4. **Appropriately scaled drawings for each modelled junction** should be provided, clearly showing the measured geometric data used as model inputs, so that the accuracy of the recorded junction geometry and its incorporation into the modelling can be properly checked.

4.1.11 It is also noted that, for the purposes of future year modelling, the applicant's consultant has applied blanket traffic growth forecasting using the Department for Transport's TEMPro programme. That can be an acceptable methodology in principle, but only on the basis that there are no major planned or committed development sites in close proximity to the junctions being assessed whose traffic effects would not be adequately captured through background growth factors alone. Where such sites exist, their traffic should ordinarily be incorporated separately within the assessment, rather than relying solely on blanket growth, because they are likely to generate specific and potentially material turning movements at the affected junctions that would not necessarily be replicated through *TEMPro*-based forecasting.

4.1.12 However, the Transport Assessment does not provide evidence that the applicant has sought confirmation from the Local Planning Authority as to the status of planned or committed development sites in the surrounding area, nor does it appear that any pre-application engagement has taken place on this matter. In the absence of that information, it has not been demonstrated that the use of blanket *TEMPro* growth is sufficient or that the assessment properly accounts for the potential cumulative effects of nearby committed development on the operation of the local highway network.

4.2 Summary and Conclusions

4.2.1 In summary, while the applicant's modelling outputs may initially suggest that the development would not give rise to unacceptable off-Site highway impacts, that conclusion cannot be relied upon due to the absence of the supporting information necessary to test, verify and validate the assessment.

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5. SUMMARY, CONCLUSIONS AND RECOMMENDATION

5.1 Summary

5.1.1 SYSTRA has reviewed the Transport Assessment (PJA report ref. *09214-R-02-Transport Assessment*, February 2026) and associated transport evidence submitted in support of planning application PL/2026/00900/PPOL for up to 185 dwellings on land south of Fillongley Road, Meriden.

5.1.2 This review has identified a number of shortcomings in the applicant's Transport Assessment and supporting transport evidence which, taken together, indicate that the application has not demonstrated that the proposed development is acceptable in highways and transportation terms.

5.2 Conclusions

5.2.1 The principal concerns relate to the Site's poor accessibility by sustainable modes, the inadequacy of the proposed access and off-Site mitigation, and the limited weight that can be attached to the traffic modelling as submitted. These issues can be summarised as:

1. The Site is not considered to be in an accessible location when assessed against the expectations of Solihull Local Plan Policy P7 and the broader objectives of the National Planning Policy Framework (NPPF) with walk distances to key local facilities and services exceeding desirable maximum limits. This is an inherent and fundamental issue caused by the Site's location and remoteness to these facilities.

2. Existing and proposed walk and cycle routes to and from key surrounding off-Site facilities and services are generally considered substandard when assessed against recent guidelines and criteria as set by Active Travel England and LTN 01/20. This also conflicts with multiple policy criteria set out within the NPPF, which broadly states that development proposals should support sustainable movement and good access to facilities to limit the need to travel, and with Policies P15 and P18 of the Solihull Local Plan which requires development to encourage walking and cycling and contribute to a high quality, safe and convenient walking and cycling network.

3. Existing walk and cycle routes to and from the Site suffer from issues including incomplete and inconsistent footway provision, limited crossing opportunities, proximity to busy carriageways with noted incidents of speeding, obstructions caused by parked vehicles, poor surface quality, and lack of lighting on some routes.

4. Limited intervention is proposed by the applicant insofar as the upgrade of these routes in order to redress these issues and subsequently the applicant does not robustly demonstrate that the available routes are safe, attractive or suitable for everyday use by a wide range of users or that the Site is served by a coherent, inclusive and policy-compliant active travel network. The applicant may seek further to remedy this issue via the provision of a wider package of mitigation in the form of enhancements to and better connections to these key routes, however their ability to do so would depend upon existing highways constraints.

5. The Site would consequently remain heavily reliant on private car travel for day-to-day journeys and therefore place increased levels of pressure on the surrounding highway network. This would remain an inherent issue given the Sites remoteness from key existing facilities, rail stations, and bus stop facilities.

6. The principal vehicular access onto Fillongley Road has not been supported by sufficient technical evidence to demonstrate that it is safe or appropriately designed, particularly in relation to visibility and the effect of prevailing vehicle speeds.

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Additional information is required to include the provision of full visibility splay drawings and speed data in order to ensure the designs meet appropriate standards.

7. The applicant's own material indicates an existing speeding problem on Fillongley Road, yet no meaningful traffic-calming or speed reduction measures are proposed. The applicant may seek to remedy this through the implementation of appropriate speed reduction measures along this route.

8. The proposed access arrangement does not accord with the Solihull MBC Developers Design and Adoption Guide, which indicates that a development of up to 185 dwellings should typically be served by at least two vehicular points of access. A safety issue arises with this as the proposals fail to demonstrate how the Site would be accessed during an emergency should the primary access be blocked. That concern is reinforced by policies TR4 and P5 of the NPPF, which requires development proposals to allow for "access by service and emergency vehicles". The applicant may seek to remedy this through the supply of additional supporting evidence to demonstrate why the design guidance typical requirements have not been followed in this case, or via identification of a secondary access junction location.

9. The proposed pedestrian crossing on Fillongley Road is not supported by sufficient evidence to demonstrate that it would operate safely, particularly given the uncertainty over whether the associated 20mph limit would be permanent and the absence of physical measures to secure lower approach speeds. Its location close to the Leys Lane junction and a nearby private access also gives rise to unresolved visibility and operational concerns. Additional information is required to include the provision of full visibility splay drawings and speed data in order to ensure the designs meet appropriate standards.

10. In respect of development impact on the wider highway network, the applicant's modelling exercise cannot presently be relied upon as a robust basis for decision-making with insufficient information being presently provided to enable the modelling assumptions, survey data, trip distribution, calibration or junction geometry inputs to be independently checked and verified. In those circumstances, and having regard to policies TR3, TR6, and DM of the NPPF, the current assessment does not provide the information necessary for robust decision-taking on the scheme's likely transport effects. The applicant should forward additional information to enable fully detailed audit and checking of the modelling assumptions utilised to inform their opinion that the site does not detrimentally worsen operation of the off-Site highway network.

5.2.2 Taken together, these matters indicate that the current application has not demonstrated compliance with the key transport-related requirements of the NPPF or the Solihull Local Plan. The Site is not shown to be suitably located or well connected by sustainable modes; safe and suitable access for all users has not been established; and the evidence submitted does not robustly demonstrate that the residual cumulative effects of the development on the highway network would be acceptable.

5.3 Recommendation

5.3.1 Based on the evidence reviewed, the application in its current form should be regarded as unacceptable on highways and transportation grounds for the following key reasons.

- The development is proposed in a location that does not provide the level of accessibility to services, public transport and active travel opportunities expected by local and national policy, and the mitigation put forward is insufficient to overcome those deficiencies. Future residents would remain heavily dependent on the private car, contrary to the sustainable transport objectives of Solihull Local Plan Policy P7 and the NPPF.

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- The proposed highway works do not demonstrate that safe and suitable access can be achieved for all users. The principal Site access is insufficiently evidenced, is proposed on a road affected by established speeding issues and does not comply with the access requirements of the Council's own design guidance for a development of this scale. The proposed pedestrian crossing is inadequately justified and cannot reasonably be relied upon as a comprehensive or robust mitigation measure.

- In addition, while the applicant's traffic modelling may suggest that the proposal would not have a severe impact on the surrounding highway network, the information submitted is not sufficient to verify that conclusion. The modelling therefore cannot currently be relied upon to demonstrate compliance with the NPPF or Policy P8 of the Solihull Local Plan.

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