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Via email: [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk)

Patrick Thomas  
Spatial Planner  
National Highways  
The Cube  
199 Wharfside Street  
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23 December 2022

Dear Sir/Madam,

### **Consultation on the Regulation 19 Publication Document for the South Staffordshire Local Plan**

National Highways welcomes the opportunity to provide comments on the Regulation 19 Publication Document for the South Staffordshire Local Plan, which covers the period between 2018 and 2039. The publication plan provides a vision for the future of the area and sets out several key objectives and planning policies that will be used to help support growth across the region. We have previously provided comments on the Local Plan Preferred Options Consultation and the Local Validation Guidance document.

National Highways have been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Within the South Staffordshire area our principal interest is safeguarding the operation of the M6, M54, A5, A449 and A4510, all of which route through the Plan area.

In responding to Local Plan consultations, we have regard to Department for Transport (DfT) Circular 02/13 – The Strategic Road Network and the Delivery of Sustainable Development, which sets out how interactions with the SRN should be considered in the development of Local Plans. The response has been set out taking this document into account. Paragraph 16 of the document states that:

*‘Through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes*

*and support wider social and health objectives and which support existing business sectors as well as enabling new growth’.*

It should be noted that the DfT Circular 02/13 is in the process of being updated, however, this response reflects the current standard.

The South Staffordshire Local Plan Review (Regulation 19) acknowledges that the plan must meet the tests of soundness outlined in the National Planning Policy Framework (NPPF). The four tests of soundness are that the Plan positively prepared, justified, effective and consistent with national policy. National Highways have reviewed the Plan on this basis.

We previously noted that all references in the Local Plan documentation to ‘Highways England’ needed to be changed to ‘National Highways’, which has now been reflected and we welcome this.

Based on the above and previous comments (set out in italics where appropriate) National Highways has the following comments on specific sections of the Plan.

### **Strategic Policies – EC12: Sustainable Transport**

National Highways welcomes the inclusion of specific policies within the Plan to address issues associated with transportation and we will work closely with developers and local highway authorities to support sustainable development and growth in the region.

Regarding the management of travel demand, the Plan states that development proposals should minimise the need to travel by car, and provide infrastructure to promote active travel with Travel Plans and Transport Assessments provided for all major development or where a proposal is likely to have significant transport implications proposals, with all other developments being required to submit a Transport Statement where appropriate. To maintain safety for all road users, maximise sustainable transport, manage the long-term public realm including transport infrastructure and be consistent with the Staffordshire County Council Local Transport Plan (LTP). National Highways welcomes this policy, however further details will be required for our review as proposals are developed further.

In terms of employment, residential, specific allocations and the Area of Search for New Settlement, since our previous review, we have no further comments to provide and our previous comments remain valid in relation to employment, residential and specific allocations, as outlined below.

## **Employment Allocations**

In terms of employment sites, we observe that the existing supply of employment land over the plan period (2018 to 2038) is sufficient to meet demand.

The West Midlands Interchange site has now been formally allocated. However, this site already consents through the Development Consent Order process, including the requisite mitigation measures pertaining to the SRN. Similarly, the ROF Featherstone site is also consented and mitigation pertaining to the A449 agreed.

As no additional employment sites above the existing supply have been identified since the Preferred Options consultation, we have no further comments to provide.

## **Residential Allocations**

Policies SA1 to SA4 inclusive set out four strategic residential sites:

- Policy SA1 – Strategic development location: Land East of Bilbrook – A minimum of 848 homes; principal impacts on the SRN likely to be on the M54 Junctions 2 and 3 and on the A449 north of M54 Junction 2
- Policy SA2 – Strategic development location: Land at Cross Green – A minimum of 1200 homes split across two parcels of land; one to the immediate north of M54 Junction 2 and a separate site further north. This allocation will directly impact on the A449 and M54 Junction 2. This allocation includes ‘safeguarded land for a parkway station’. The southern parcel of land abuts the M54.
- Policy SA3 – Strategic development location: Land North of Linthouse Lane – a minimum of 1200 homes, main traffic impacts likely to be at M54 Junction 1
- Policy SA4 – Strategic development location: Land North of Penkridge: this allocation is spread across 5 parcels of land, although the development quantum has not been stated; this will need to be confirmed. Greatest traffic impacts likely to be at M6 J13 and A5/A449 Gailey roundabout. The site abuts the A449, although the A449 is not a trunk road at this point. Whilst the site itself does not abut the M6, a portion of land to the immediate east of the site identified as ‘green infrastructure, in part, does abut the M6.

Policy SA5 – housing allocations, sets out circa 40 smaller scale sites which are additions to existing settlements.

Policy SA6 - gypsy and traveller allocations, sets out a limited number of small-scale sites.

A suitable transport evidence base is required with the goal of identifying the need for and form of any highway mitigation works on the SRN arising from the Local Plan residential allocations.

With regards to policies SA1 to SA4, we have sought to agree a methodology with Staffordshire County Council (as local highways authority). Our SATURN model prepared for the M54 – M6 link road proposal has been provided to Staffordshire County Council in order to determine the trip distribution and assignment of traffic for the Local Plan sites. This data is then to be provided to the site promoters and their advisors for their use in carrying out their own technical assessments. In consultation and agreement with us, such assessments will be used to identify the need for any form of any highway mitigation works on the SRN. This is still to be determined.

Paragraph 5.22 of the IDP cites the discussions held between National Highways and Staffordshire County Council with regards to the transport evidence base. It is also stated that this approach has been agreed between the two parties. Whilst the principle of the approach has been agreed, there remain technical details to discuss and agree. We are committed to ongoing engagement with South Staffordshire Council and the local highways authority in order to finalise the technical details of this methodology.

Policy SA2 includes ‘safeguarded land for a parkway station’. Should such a proposal come forward in future, we will need to be consulted at an early stage to ensure appropriate assessments are carried out in accordance with DfT 02/2013 and the Design Manual for Roads and Bridges (DMRB). This is to identify the need for and form of any mitigation required for the SRN.

### **Specific Strategic Allocations**

We also offer the following further comments in regard to the specific strategic allocation sites which about the SRN:

#### **SA2 Land at Cross Green**

The northern part of this Housing Allocation (646a) is separated from the southern part by “green infrastructure”. This suggests that the traffic associated with this area of the site will use the existing Local Road network and A449 Trunk Road junctions (i.e., Brewood Road from the southern Coven roundabout and Old Stafford Road approximately 500 metres to the south). These junctions will need to be assessed for safety and capacity, with appropriate improvements identified as necessary within existing Highway limits along with any Departures from Standard. In addition, the need for land within this Housing Allocation site for environmental mitigation measures, for example noise attenuation, will need to be considered in accordance with paragraphs 45 – 48 and Annex A paragraph A1 of the Department for Transport Circular 02/2013.

The southern edge of this Housing Allocation site (646b) has a boundary with the M54 motorway (eastbound on-slip road). Similarly, land considerations for traffic capacity

improvements will need to be considered along with land for environmental mitigation, for example, noise attenuation. It is noted that National Highways surface water drainage assets exist close to the site boundary at the foot of the structural embankment (northern side). The site proposals will need to demonstrate that these assets are protected from site surface water discharge in accordance with paragraph 50 of the Department for Transport Circular 02/2013.

#### **SA4 Land North of Penkridge**

These Housing Allocation sites are separated from the boundary of the M6 motorway by an area of “green infrastructure” and the River Penk . In terms of the design of this green infrastructure, it will be necessary to consider the need for inclusion of any environmental mitigation measures, for example noise attenuation to meet the requirements of paragraph 45 of the Department for Transport Circular 02/2013. It is also noted that the green infrastructure boundary is close to an Air Quality Management Area (AQMA 1 Woodbank) declared by South Staffordshire Council in 2006.

Policy SA5 - housing allocations, sets out a series of other smaller scale additions to existing settlements and Policy SA6 relates to gypsy and traveller allocations. At such time these sites come through the planning application process, we will need to be consulted at an early stage to ensure appropriate assessments are carried out in accordance with DfT 02/2013 and the Design Manual for Roads and Bridges (DMRB). This is to identify the need for and form of any mitigation required for the SRN.

Details on these smaller sites will be required in terms of the proposed boundary treatments to SRN including any necessary environmental mitigation, for example noise attenuation and surface water drainage which to demonstrate compliance with the DfT Circular 02/2013.

The formation of any new junction on the SRN will need to comply with paragraph 11 of the DfT Circular 02/2013 and comply with DMRB standards. Similarly, where existing site access arrangements which interface with the SRN are identified for use, any existing non-DMRB compliant features which cannot be improved to current DMRB standards will need to be the subject of appropriate Departures from Standard and DfT Circular 02/2013.

#### **Area of Search for New Settlement**

We note the criteria-based policy DS4 detailing the broad parameters for a new settlement to come forward after the Local Plan period which ends in 2038. This includes an area of search, in broad terms, mirroring the West Coast mainline/A449 between the M6 and M54 motorways.

Given the location, it can reasonably be expected that such a new settlement would result in material implications for our network. This in terms of traffic, site access arrangements and possible abutment.

At such time further details emerge in relation to this proposal, we will need to be consulted at an early stage to ensure appropriate assessments are carried out in accordance with DfT 02/2013 and the Design Manual for Roads and Bridges. This is to identify the need for and form of any mitigation required for the SRN.

## **Other Matters**

### **Additional IDP Comments**

We previously commented that the IDP refers to the decision from the Secretary of State regarding the M54-M6 link road proposal being expected in October 2021. This is no longer the case as the decision to grant approval was made in April 2022. We note that the document has been updated to reflect this comment.

As previously mentioned, in terms of any mitigation identified as being necessary to maintain the free flow and safety of the SRN, we will seek to enter into Section 278 agreements with developers to deliver specific improvement schemes on the SRN where they are found to be necessary. This provides certainty of delivery.

### **Climate Change**

National Highways supports the opportunities to meet net zero ambitions, and we welcome the opportunity to work with stakeholders to reduce the impact of carbon emissions on the environment. Sites will be reviewed in the context of the National Highways Net Zero Plan.

National Highways also welcomes the inclusion of specific policies within the Plan to directly tackle climate change with initiatives such as designing for active travel, electric vehicle charging and designing for green infrastructure, and supports these policies.

### **Statement of Common Ground**

National Highways has engaged with Local Planning Authorities to develop and agree a Statement of Common Ground summarise the ongoing discussions and co-operation between the South Staffordshire Councils and National Highways. The document includes details of how the Councils have responded positively to comments and representations made by National Highways as part of the Development Plan review process, the approach to collaborative joint working on the preparation of additional evidence, and agreement on where future collaborative work will focus.

Accordingly, National Highways welcomes the opportunity to support a draft Statement of Common Ground to inform an Inspector.

We look forward to collaboratively working with you to support the development and adoption of the new Local Plan for South Staffordshire. If you have any questions or comments, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'P. Thomas', with a stylized flourish at the end.

Patrick Thomas  
Spatial Planner

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