

Statement of Common Ground
between National Highways (NH),
Staffordshire County Council (SCC),
City of Wolverhampton Council
(CWC) and South Staffordshire
District Council

South Staffordshire Local Plan 2023-
2041

Position at October 2024

Transport Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC), National Highways (NH), Staffordshire County Council (SCC) & City of Wolverhampton Council (CWC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC), National Highways (NH), Staffordshire County Council (SCC) and City of Wolverhampton Council (CWC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2023-2041. CWC and SCC are parties to this statement of common ground to reflect their statutory responsibilities as highways authorities and to ensure that sustainable transport measures are appropriately prioritised in the delivery of the emerging local plan.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover key strategic transport matters relevant to the South Staffordshire Local Plan 2023-2041. This includes consideration of how the parties have worked together to identify impacts on the strategic and local highway networks, the approach to identifying mitigation and how the authorities will continue to work together going forward as sites allocated in the local plan are progressed.

Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority area of South Staffordshire District, whilst having regard to potential cross-boundary transport matters arising from the South Staffordshire Local Plan 2023-2041 that may affect City of Wolverhampton Council.

Transport evidence base to date

4. In cooperating on strategic and cross-boundary transport matters the following documents have been of particular relevance to informing the parties’ position:
 - Summary outcomes of the cumulative strategic highways modelling set out in the Staffordshire County Council consultation response to the Preferred Options consultation 2021
 - Land East of Bilbrook, Staffordshire – Strategic Transport Assessment 2022
 - Land North of Penkridge – Strategic Transport Assessment 2022
 - Strategic Road Network Impact Assessment Summary 2022
 - Local Cycling and Walking Infrastructure Plan 2021-2031
 - Staffordshire Bus Service Improvement Plan 2024-2050
 - South Staffordshire Integrated Transport Strategy (2017)
 - Emerging South Staffordshire Integrated Transport Strategy (2024)
5. As evidenced in the above, the parties to this SoCG have worked collaboratively over a number of years to prepare a highways evidence base to support the local plan. The parties have met as and when needed to progress this evidence base, responding to issues as they

emerged through the local plan's preparation. Key events in the plan's preparation, and the manner of co-operation between parties is set out below.

Previous consultation stages and ongoing cooperation to date on strategic transport issues

6. In 2018 SSDC consulted on an Issues and Options consultation setting out a preferred housing target and employment targets, indicating indicative development typologies that may assist in meeting these strategic growth needs. These development needs were not specific to individual sites or broad locations, meaning that there was limited ability for SCC, NH or CWC to correspond on specific transport issues at this stage, although a key part of the consultation that each party was given a chance to comment on was the adequacy of the planned transport evidence base to be used to support the Local Plan. A summary of key points raised in the consultation is set out below.

Respondent	Key strategic transport points from 2018 consultation response
SCC	<ul style="list-style-type: none"> - 2017 Integrated Transport Strategy should be included as evidence - Indicated intention to provide evidence of sustainable transport accessibility, indicated new development should have access to high quality public transport to jobs, education and services, whilst acknowledging the very limited funding to support bus services - Indicated intention to provide evidence of traffic impacts of proposed new development sites - Priority should be to locate development within easy access to the rail network - Feasibility of new rail station at Brinsford to be explored by Midlands Connect with engagement of SCC
NH	<ul style="list-style-type: none"> - Robust transport evidence base required to provide basis for selection of growth options and assessing impacts and necessary mitigation for preferred spatial option - Evidence base must include assessment of impact on SRN roads and junctions, both site specific and cumulative - Supportive of providing critical mass of development at smaller number of locations to ensure full use of sustainable and public transport in mitigation - Offered indications of potential highways implications of certain broad development locations
CWC	<ul style="list-style-type: none"> - Transport impacts of development, including on Wolverhampton, should be fully assessed, minimising trip generation - Allocations should link to the strategic transport network and avoid excessive pressure on sensitive transport links - Employment land allocations should be made in locations most accessible by a choice of means of transport to the Wolverhampton workforce - Support the Brinsford Strategic Park and Ride proposal

7. In preparing the subsequent 2019 Spatial Housing Strategy and Infrastructure Delivery consultation SSDC had regard to the views raised above, particularly the identified need to prioritise development in areas with high quality public transport links (especially rail) to jobs, education and services. It also noted the support for progressing feasibility work on the

rail-based park and ride at Brinsford and the need to fully assess cross-boundary transport impacts upon CWC's administrative area. It also had regards to the point raised by NH that concentrating a critical mass of development in a smaller number of large developments may offer better opportunities for public transport mitigation. SSDC also progressed initial discussions with NH and SCC at this point to understand the transport evidence base needed to support future iterations of the Local Plan where site allocations were identified.

8. This led to the 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation in late 2019, which set out SSDC's preferred spatial distribution of housing growth and alternative strategies considered. The Council's preferred strategy concentrated new allocations primarily to the District's Tier 1 settlements, which had larger services and facilities and rail links into the conurbation, and urban edge locations directly adjacent to the cities and towns of the Black Country and their associated services and public transport links. Whilst specific sites were not identified at this stage, this approach of proposing growth in broad locations was used to help to understand the infrastructure needs and opportunities that would result from such an approach and test alternative methods of distributing growth with key stakeholders prior to site selection taking place. A summary of key points raised in the consultation is set out below.

Respondent	Key strategic transport points from 2019 SHSID consultation response
SCC	<ul style="list-style-type: none"> - Indicated SCC had request access to NH's model for the M54-M6 link road to assess impacts on the strategic road network (SRN) - Updated on jointly commissioned study between SCC and SSDC to examine the case for a new rail-based park and ride at Brinsford - Strategy should make best use of existing infrastructure to ensure it is sustainable and affordable - Expected that sustainable transport options are carried through to policies and mitigation proposals - Required highways mitigation to be identified with reference to traffic modelling to inform local plan - Provided indicative measures likely to support sustainable transport mitigation in specific broad locations
NH	<ul style="list-style-type: none"> - Highlighted need for a robust evidence base to provide basis for impacts on the SRN and necessary mitigation - Indicated SRN work will need to include SRN roads and junctions within the District and immediately nearby, assessed on both a site specific and cumulative basis - Advised on progress and likely impacts of West Midlands Interchange and M54/M6 Link Road scheme
CWC	<ul style="list-style-type: none"> - Requested development link effectively to strategic transport network and avoids excessive pressure on sensitive transport links - Additional homes for HMA wider needs should have good access and transport choice into Black Country urban area and wider HMA - Supported Brinsford Park and Ride allocation and requested this is promoted in local plan

9. In preparing the subsequent 2021 Preferred Options consultation SSDC worked with both NH and SCC to secure agreement to use the Saturn model associated with the M54/M6 link road development consent order to assess cumulative traffic flows arising from proposed development allocations prior to the 2021 Preferred Options consultation being finalised and identify any initial areas of concern. This exercise was completed alongside the preparation of the 2021 Preferred Options document, with the input of NH and SSDC to ensure a consistent picture of committed development and proposed allocations. The results from this exercise informed the SCC and NH's response to the consultation, which is included in the table below.
10. SSDC, CWC and SCC commissioned SLC Rail to prepare a Strategic Outline Business Case (SOBC) for a new parkway rail station at Brinsford. The SOBC considered options to address transport issues in the surrounding area around Brinsford, concluding that constructing a 2-platform station with a minimum service of 2 local trains per hour to Birmingham, alongside 500 car parking spaces, was considered the most appropriate solution, which could also be constructed with minimal intervention to existing rail infrastructure. This work also indicated that all scenarios would achieve a positive benefit to cost ratio and would increase net rail demand by nearly 500,000 trips.

Respondent	Key strategic transport points from 2021 Preferred Options consultation response
SCC	<ul style="list-style-type: none"> - Indicated that Brinsford Parkway Station Strategic Outline Business Case and Transport Impacts (with Staffordshire County Council) 2022 should both be listed in the evidence base - Requested support was stated for the rail-based parkway at Brinsford - Confirmed SCC's role in providing high level transport modelling, accessibility and connectivity advice in supporting the spatial strategy - Confirmed SCC's support for a rail-based parkway at Land at Cross Green and partnership working with CWC and SSDC to support its delivery - Provided updated accessibility modelling, cumulative assessments of strategic housing sites (including details of methodology used) and identified areas of the road network likely to require mitigation once transport assessments completed - Provided information on likely active travel mitigation measures for each site to inform further transport work - Indicated that an updated LCWIP would be published in 2022/23
NH	<ul style="list-style-type: none"> - Confirmed no additional transport evidence base required for employment due to the work undertaken through the DCO for West Midlands Interchange and the ROF Featherstone planning consent - Indicated a suitable transport approach first should be taken forward to support the housing allocations - Indicated NH's model for the M54-M6 link road should be used to determine trip distribution and assignment of traffic to inform the site's own technical assessments, which will then be used to identify the need for and form of any mitigation measures

	<ul style="list-style-type: none"> - Confirmed the principle of the approach taken by SSDC’s transport evidence base had been agreed through discussions with SSDC, but that technical details remained to be agreed - Highlighted site specific highways considerations relating to strategic housing sites.
CWC	<ul style="list-style-type: none"> - Requested that combined impact of SSDC and potential developments set out in the Draft Black Country Plan are assessed - Requested development minimise trip generation through services, promote multi-modal connectivity and maximise opportunities for future vehicle technologies (electric vehicles) - Indicated that initial evidence from discussions to date suggested that impacts on CWC’s highway network could be mitigated through a viable and deliverable package of developer-funded improvements - Indicated support for rail-based Brinsford park and ride allocation

11. Responding to the need for a further detailed transport evidence base to satisfy the issues raised in the consultation responses, prior to the 2022 Publication Plan consultation NH, SSDC, SCC and CWC worked together with individual site promoters to agree the scope of Strategic Transport Assessments (STAs) for each of the district’s then proposed four largest strategic housing allocations (Land at Cross Green, Land off Linthouse Lane, Land North of Penkridge and Land East of Bilbrook)¹. These assessments were then prepared by the site promoters, detailing the impacts of the sites on the surrounding highway network and proposing indicative mitigation measures (including public transport and active travel interventions where appropriate). Responding to the need for a cumulative assessment to be prepared, the site promoters also worked together jointly with SCC, CWC, SSDC and NH to prepare an assessment of cumulative transport impacts, which primarily related to the Strategic Road Network. This indicated that, at this time, no additional mitigation measures are needed to address cumulative impacts on the Strategic Road Network.

12. Following the 2021 Preferred Options consultation, a Strategic Outline Business Case (SOBC) for the Brinsford parkway was completed and indicated that Brinsford station is potentially a viable project. The station would open railway connectivity to around 500,000 journeys per annum (of which c 220k ‘local’ demand, 180k ‘Parkway’, 65k ‘Brinsford area’). The Benefits/Costs Ratio (BCR) value (base cases 2.86 - 3.03) is ‘high’ resilient and tested against a range of sensitivities and the BCR remains satisfactory in all but the worst of scenarios. Early station scoping has been carried out, which would envisage a ‘simple’ unstaffed station with 500 car parking spaces with the design vision key to minimise interference on railway to reduce cost, construction time and risk. Safeguarded Land to accommodate the station was proposed in the Local Plan Publication Plan (November 2022).

Respondent	Key strategic transport points from 2022 Publication Plan consultation response
SCC	<ul style="list-style-type: none"> - Requested that developers of land north of Penkridge update the STA due to concerns with some of the schemes in the STA, though believe there is an acceptable solution to be agreed prior to examination.

¹ Subsequently, as the Local Plan has evolved SSDC has removed two of these four sites from the plan (Linthouse Lane and Cross Green).

<p>NH</p>	<ul style="list-style-type: none"> - Welcome Policy EC12: Sustainable Transport however further details will be required for review as proposals are developed further, - Confirmed no additional transport evidence base required for employment due to the work undertaken through the DCO for West Midlands Interchange and the ROF Featherstone planning consent. - Indicated NH's model for the M54-M6 link has been provided to trip distribution and assignment of traffic to inform the site's own technical assessments, which will then be used to identify the need for and form of any mitigation measures. Confirmed that this is still to be determined. - Highlighted site-specific highways considerations relating to strategic housing sites.
<p>CWC</p>	<ul style="list-style-type: none"> - Requested development minimise trip generation through services, promote multi-modal connectivity and maximise opportunities for future vehicle technologies (electric vehicles) - Initial evidence suggested that impacts on CWC's highway network could be mitigated through a viable and deliverable package of developer-funded improvements - works to be completed in support of the Submission Plan in order that appropriate mitigation measures are agreed. - it is essential that the Plan and / or Statement of Common Ground provides assurance that CWC will be consulted on any transport assessments / planning applications associated with development sites near the Wolverhampton boundary, including land adjoining Perton and land adjoining Codsall / Bilbrook. - Indicated support for rail-based Brinsford park and ride allocation

13. Following the 2022 Publication Plan proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

14. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDC's revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA. This has resulted in a revised housing target of 4,726 homes. This revised strategy resulted in two strategic sites (Land at Linthouse Lane and Land at Cross Green) being removed from the plan and therefore likely resulted in lesser impact on the Strategic Road Network than the previous iteration of the plan.
15. For employment land the strategy will see the Council meet its own needs of 62.4ha and a contribution of 45.2ha to the unmet needs of the Black Country (excluding WMI). This will be predominately met by the existing pipeline of employment sites, with only one new allocation at M6 Junction 13 proposed.
16. The deletion of land at Cross Green from the Local Plan also means that part of the site is no longer proposed for safeguarding for Brinsford park and ride. Following the 2022 Publication Plan and the completion of the Strategic Outline Business Case for Brinsford park and ride. West Midlands Rail Executive commissioned consultants to assess the potential case for developing a number of new stations including Brinsford park and ride. The study concluded that bus enhancements were the optimum solution, but with an option to revisit rail if significant developments² materialise in the area. Given this uncertainty around the feasibility of the scheme, it is no longer considered appropriate that the scheme is included in the plan, however, will remain as an aspiration in SSDC's Infrastructure Delivery Plan should circumstances change which allow it to be revisited.

Respondent	Key strategic transport points from 2024 Publication Plan consultation response
SCC	- Consideration will need to be given to the A449 junctions through Penkridge and Stafford as a result of the M6 Junction 13 allocation. Still need confirmation that this can be delivered in transport terms.
NH	- Confirmed mitigation measures agreed through the DCO for West Midlands Interchange and the ROF Featherstone planning consent. Confirm that greatest traffic impact from M6, Junction 13 will be on Junction 13 itself. - Indicated NH's model for the M54-M6 link has been provided to trip distribution and assignment of traffic to inform the site's own technical assessments, which will then be used to identify the need for and form of any

² The previous Cross Green allocation was already assumed within the analysis

	<p>mitigation measures. Confirmed that this is still to be determined.</p> <ul style="list-style-type: none"> - Highlighted site-specific highways considerations relating to strategic housing sites. - Support for an updated SoCG detailing how the Council has responded positively to comments and representations by National Highways as part of the Local Plan review process
CWC	<ul style="list-style-type: none"> - Identifies sites at Bilbrook, Perton and ROF Featherstone as close enough to potentially impact Wolverhampton infrastructure. - Further work is required to understand the combined impact of South Staffordshire development proposals and Wolverhampton Local Plan developments on the wider transport network. - Disappointing that the South Staffordshire Local Plan does not safeguard land for a rail based park and ride north of the M54. Request that the benefits of this proposal are recognised and that the Local Plan continues to promote a rail-based park and ride north of M54

Areas of agreement and ongoing work

17. The following matters are agreed between all relevant parties to this Statement of Common Ground:
- Constructive and ongoing engagement has occurred between all parties and the Duty to Cooperate has been met
 - The methodology used in the two Strategic Transport Assessments for the two strategic housing sites in the South Staffordshire Local Plan 2023-2041.
 - There is a need for cumulative impact assessment of the strategic housing sites on the Strategic Road Network
 - That the combined impact of SSDC's Local Plan proposals on CWCs network can be considered and addressed when planning applications on relevant sites are submitted to SSDC. At this stage SSDC will undertake formal consultation with CWC highways team who will work with SCC highways to ensure impacts on both networks are assessed and appropriate mitigation measures identified.
 - Mitigation set out in the Strategic Transport Assessments (STAs) will be included in future iterations of the Infrastructure Delivery Plan (IDP) to support site delivery
 - SSDC and NH have agreed that a sustainable transport first approach should be undertaken to mitigate the impact of the allocated sites.
 - Finalised mitigation schemes will be set out at the planning application stage and will prioritise delivery of active travel and sustainable transport mitigation measures over measures to facilitate car trips
 - SSDC, SCC and CWC all support the principle of the Brinsford Parkway and will engage collaboratively if circumstances change which allow it to be revisited in the future
 - Based on the evidence to date, there are no concerns about the potential deliverability of growth set out in the South Staffordshire Local Plan 2023-2041

18. Areas of ongoing work:

- Mitigation measures set out in the IDP/STAs are considered indicative and are not yet finalised – all parties will work collaboratively to bring forward final mitigation schemes
- While the cumulative traffic impacts do not need to be fully resolved prior to the Examination in Public (EIP), National Highways commit to ongoing collaboration with the local council and developers to complete the cumulative assessment as part of the plan-making process.
- The STA and required mitigation measures for the strategic site north of Penkridge is yet to be agreed and finalised between SCC and the site promoters. The site promoters are currently addressing comments from SCC to live planning applications³ covering the whole site to ensure the necessary mitigation measures are in place.

19. Areas of disagreement:

- None

³ • 23/00851/FULMEI – Land East of the A449, controlled by Bloor Homes Ltd – detailed application for 135 dwellings;
• 23/01052/OUTMEI – Land East of the A449, controlled by Bloor Homes Ltd – outline application for 135 dwellings (note – this is the same site as 23/00851/FULMEI);
• 23/01079/OUTMEI – Land East and West of the A449, controlled by St Philips – outline application for up to 750 dwellings; and
• 24/00427/OUTMEI – Land West of the A449, controlled by Bloor Homes – outline application for up to 165 dwellings.

Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and City of Wolverhampton Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

South Staffordshire District Council

Name: Kelly Harris

Position: Lead Planning Manager

Signature:



Date: 14.11.24

City of Wolverhampton Council

Name:

Position:

Signature:

Date:

Staffordshire County Council

Name:

Position:

Signature:

Date:

National Highways

Name:

Position:

Signature:

Date: