

Our ref: **SHARE/** 98483465
Your ref: South Staffordshire Local Plan - Issues
and Strategic Options Consultation

Strategic Planning Team
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Via Email:
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Dear Sir/Madam,

SOUTH STAFFORDSHIRE LOCAL PLAN PREFERRED OPTIONS CONSULTATION

Thank you for the opportunity to comment on the Local Plan Preferred Options Consultation in South Staffordshire.

National Highways has been appointed by the Secretary of State for Transport as 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 national asset and as such works 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.

The SRN in South Staffordshire comprises sections of the A5 and A449 trunk roads together with sections of the M6, M54 and M6T motorways.

Please note that all references in the Local Plan documentation to 'Highways England' need to be changed to 'National Highways'.

We have reviewed the key consultation documents; 'Local Plan Preferred Options' November 2021 and 'Infrastructure Delivery Plan' September 2021.

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 is already consented 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.

The preferred options identify no additional employment sites above the existing supply. Therefore, a transport evidence base for employment sites is not required as part of the Local Plans Preferred Options process.

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 SCC (as local highways authority). Our SATURN model prepared for the M54 – M6 link road proposal has been provided to SCC 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 and form of any highway mitigation works on the SRN.

Paragraph 5.22 of the IDP cites the discussions held between us and SCC 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. This is to identify the need for and form of any mitigation required for the SRN.

We also offer the following further comments in regards to the specific strategic allocation sites which abut 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.

Sustainable Transport

For the four strategic residential sites, the following infrastructure and design requirements are cited *'Highways, sustainable transport and active travel infrastructure, including links to infrastructure in the wider area'*. More generally, policy HC19 refers to the requirements for green infrastructure, including for active travel. Policy EC 11 *'Sustainable Transport'* sets out a number of broad policy measures.

The commitment to sustainable transport and active travel is welcomed; although further detail will be required for our review as proposals are developed further.

Additional IDP Comments

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; the decision is now expected in April 2022. The IDP will need to be amended to reflect this.

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 to delivery.

Next Steps

We look forward to continue to work with you as the Plan develops, in particular in relation to the transport evidence base. Please contact me should any queries arise.

Yours sincerely



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