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Dear Sir/ Madam,

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

National Highways welcomes the opportunity to provide comments on the Publication version of the Local Plan (Regulation 19) prepared for South Staffordshire Council, which is expected to cover the plan period from 2023 to 2041.

National Highways has 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. It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

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 the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the Delivery of Sustainable Development ('the Circular') which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:

"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their

plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.”

In addition to the DfT’s Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

Regulation 19 Consultation on the Publication Plan (April 2024)

The Publication Plan contains locally specific policies and strategic / non-strategic site allocations to support the housing and employment requirements across South Staffordshire for the plan period of 2023 to 2041. We note that when adopted, this Local Plan will replace the Core Strategy which was adopted in 2012 and accompanying Site Allocations Document (SAD) which was adopted in 2018 as the Local Plan for the district.

National Highways agree in principle to the vision and objectives of the draft Local Plan.

Earlier Consultation on the Publication Plan

National Highways was previously consulted on an earlier version of the Publication Plan in 2022, and a response setting out our views and way forward was issued subsequently. We note that this version has now been updated to account for the changes to the National Planning Policy Framework (NPPF) published in December 2022, specifically in relation to the Green Belt policy.

Since our previous review, we have noted a few changes in the demand and supply details provided in the current version of the Publication Plan, as outlined in the sections below.

Housing and Employment Requirements

The earlier ‘Regulation 19 Publication Plan in November 2022’, identified a total demand of 63.6 hectares of employment land and 9,089 dwellings to come forward over the plan period up to 2039. This included South Staffordshire’s own housing needs of 4,097 dwellings (241 dwellings per annum) and an additional 4,000 dwellings

to compensate the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).

Having reviewed the current Regulation 19 Publication (April 2024), we note that a revised assessment has been undertaken for the plan period up to 2041, wherein, the minimum requirement has decreased to 62.4 ha of employment land and 4,726 dwellings. This includes South Staffordshire's own housing needs of 4,086 dwellings (227 dwellings per annum) and an additional 640 dwellings to compensate the unmet needs of the GBBCHMA as out in Strategic Policy DS4 – Development Needs.

Residential Allocations

In order to meet the revised housing demand, we note that a few strategic and non-strategic sites that were allocated in the earlier Regulation 19 Publication Plan have now been omitted. In the earlier version, four strategic residential sites were allocated which is now reduced to two as listed below:

1. Policy SA1 – Strategic development location: Land East of Bilbrook – A minimum of 750 homes; principal impacts on the SRN are likely to be at the M54 J2 and J3.
2. Policy SA2 – Strategic development location: Land North of Penkrige: A minimum of 1,029 homes; greatest traffic impacts are likely to be at M6 J13 and A5/A449 Gailey roundabout.

Policy SA3 sets out the non-strategic housing allocations identified to meet the District's housing target up to 2041. We acknowledge that the growth is largely planned to cover the most accessible and sustainable locations within the district, particularly focused on Tier 1 settlements such as Penkrige, Codsall, Bilbrook, etc. Policy SA4 includes the revised details of the gypsy and traveller pitches allocated in the emerging Local Plan.

Employment Allocations

In terms of employment sites, we observe that the existing supply of employment land over the plan period of 2023 to 2041 is sufficient to meet the employment needs.

The allocation quantum for the West Midlands Interchange site has now been fully captured to cover for the Plan Period in the latest version. However, we acknowledge that 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.

We note that a new strategic employment allocation has been included near M6 J13 with a quantum of 17.6 ha alongside the employment sites identified previously. Considering the proximity to the site, the greatest traffic impact is expected to be at the M6 J13. It is also noted that the north-east boundary of the site abuts the M6 in the area.

Potential Impacts on the SRN

As noted in our earlier responses, 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 allocations.

The table below summarises the likely potential impacts we expect from some of the housing and employment allocation sites (but not limited to) in terms of traffic and boundary impacts.

S. No	Type of Allocation	Policy Number	Location	Quantum of Development	Boundary Impacts (Landscape, air, noise, drainage, etc.)	Traffic Impacts
1	Housing allocation	SA1	Land East of Bilbrook	750 Dwellings		M54 J2 and J3
2	Housing allocation	SA2	Land North of Penkridge	1029 Dwellings		M6 J13 and A5/A449 Gailey Island roundabout
3	Housing allocation	SA3	Land at Cherry Brook	88 dwellings	M6	
4	Housing allocation	SA3	Land between A449 Stafford Rd & School Lane	48 dwellings	A449	
5	Employment allocation	SA5	I54 Western Extension	40 ha	M54	M54 J2
6	Employment allocation	SA5	M6 Junction 13, Dunston	17.6 ha	M6	M6 J13

Note: The above list excludes ROF Featherstone and West Midlands Interchange as these sites benefits from an existing consent and mitigation measures agreed with NH

With regards to policies SA1 and SA2, it was agreed with South Staffordshire Council (as local highways authority) that the SATURN model prepared for the M54 – M6 link

road proposal will be used to determine the trip distribution and assignment of traffic for the Local Plan sites. It was also agreed that this data 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. We understand that this is still to be determined and we look forward to hearing from you in due course.

Other comments

Policy SA2 - Land North of Penkridge: The housing allocation site is 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 as set out in the Department for Transport Circular 01/2022. 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 SA3 - housing allocations, and Policy SA4 - 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 Circular 01/2022 and the Design Manual for Roads and Bridges (DMRB) guidelines. 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 the SRN including any necessary environmental mitigation, for example noise attenuation and surface water drainage to demonstrate compliance with the DfT Circular 01/2022. The formation of any new junction on the SRN will need to be compliant with the DfT Circular 01/2022 and 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 01/2022.

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.

The policy notes that all major developments or where a proposal is likely to have significant transport implications will be required to produce Travel Plans and Transport Assessments, with all other developments being required to submit a Transport Statement where appropriate. 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.

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 NB5 – Renewable and low carbon energy generation, NB6A – Net zero new build residential development (operational energy), NB6B – New build non – residential development (Operational energy), NB6C – Embodied Carbon and Waste, NB7: Managing Flood risk, Sustainable drainage system & water quality, EC – 12 Sustainable Transport, designing for active travel, electric vehicle charging and designing for green infrastructure. We appreciate the effort taken in developing these policies and consider this to be aligned with the expectations set out in the National Planning Policy Framework and [National Highways' Net Zero Strategy](#).

Infrastructure Delivery Plan

Paragraph 5.6 of the Infrastructure Delivery Plan (IDP) cites the discussions held between National Highways and South Staffordshire Council (SSC) with regards to the transport evidence base. Whilst the principle of the approach in assessing the traffic impacts has been agreed, there remain technical details to discuss and agree. We are committed to ongoing engagement with SSC and the local highways authority in order to finalise the technical details of this methodology.

We appreciate that the IDP will be updated regularly to accommodate the infrastructure schemes in the pipeline. 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.

Duty to Cooperate and Statement of Common Ground

We appreciate the Council's commitment to working constructively with neighbouring authorities and relevant bodies. We also note that the Local Plan provides a surplus of housing sites in order to remain flexible in accommodating the unmet needs of neighbouring authorities. For any developments which have an impact on neighbouring local authorities, we advise a joined-up approach in which National Highways, South Staffordshire Council and the other local authorities attend joint meetings with the future developer or applicants. This will ensure that the interests of all parties are protected, and a combined solution is derived.

National Highways would like to work to develop and draft a Statement of Common Ground (SoCG) to summarise the ongoing discussions and co-operation between the South Staffordshire Council and National Highways. The document would include details of how the Councils have responded positively to comments and representations made by National Highways as part of the Local Plan review process, the approach to collaborative joint working on the preparation of additional evidence, and agreement on where future collaborative work will focus.

Based on the above comments, National Highways would welcome the opportunity to support a draft SoCG to inform the Planning Inspector.

We look forward to working with the Council in a collaborative manner to aid and 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,



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