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Dear Sir/ Madam,

Sandwell Council Draft Local Plan Review - Regulation 18 Consultation

National Highways welcomes the opportunity to provide comments on the first draft Local Plan (Regulation 18) prepared for Sandwell Metropolitan Borough Council (MBC), which is expected to cover the plan period from 2022 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). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In relation to this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the SRN, notably the M5 and M6 networks which route through the Local Plan boundary.

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 Strategic Road Network 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 DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

National Highways had previously been consulted during the 'Issues and Options' consultation, where a total demand of 205.4 hectares of employment land and 30,300 dwellings were identified as a requirement to come forward over the plan period. During that consultation, we acknowledged the shortfall of housing and employment sites in our response. We also recommended that the potential impacts (both individual and cumulative) on the SRN in the area from the developments be considered through the development of a robust transport evidence base. It was also noted that;

'National Highways would like to ensure that all the relevant transport impacts and requirements are taken into account.

We suggested to work together to;

- Identify the individual and (where necessary) cumulative impacts that the proposed allocations are likely to have on the SRN, factoring in the demands arising from developments planned in adjacent authorities.*
- Assess the impact of the SRN on the development potential of proposed site allocations.*
- Consider travel plans, travel demand and off-work improvements.*
- As necessary, identify the infrastructure requirements of the proposed allocations, or specific parts (phases) of proposed allocations. '*

We are still committed to the above and wish to setup a working group to develop further as you head into your Regulation 19 process.

Draft Local Plan

The draft Local Plan contains locally specific policies and strategic / non-strategic site allocations to support the housing and employment requirements across Sandwell for the plan period of 2022 to 2041. We note that when adopted, this Local Plan will

replace the Black Country Core Strategy (adopted in 2011), the Sandwell Site Allocations and Development Plan Document (the SAD, adopted in 2012) and Area Action Plans for West Bromwich, Smethwick and Tipton. We also note that the Local Plan will incorporate elements of former supplementary planning documents as appropriate and will include details from the West Bromwich Masterplan and Interim Planning Statement.

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

Housing and employment requirements

Based on our review of the Regulation 18 consultation, we note that the housing and employment requirement has changed slightly since the 'Issues and Options' consultation. The draft Local Plan consultation document outlines that there is a requirement to deliver 185 hectares of employment land and 29,773 dwellings over the plan period up to 2041. We note that the housing and employment requirement have primarily been identified based on the National Standard method on housing projections and Economic Development Need Assessment (EDNA) respectively.

While the housing demand stands at 29,773 dwellings, supply for 11,167 dwellings is expected to come through the adoption of the upcoming Local Plan, thereby leaving an unmet need for 18,606 homes. We appreciate that the Council will liaise with the neighbouring authorities to help accommodate some of Sandwell's unmet housing needs through their own housing provision. National Highways welcomes further information on this once the Council identifies the working arrangement and we look forward to understanding the impacts from these developments on the SRN in the area as you progress into Regulation 19.

The quantum of employment land intended to be delivered through the Local Plan is 42ha, with a shortfall of 143ha. We note that the housing and employment supply identified in the Draft Local Plan has considered the existing planning applications, sites under construction, and windfall allowance.

We note that a Sustainability Appraisal process has been undertaken to streamline the different housing and employment growth options and acknowledge that the allocation of sites has taken into consideration the location, availability of greenfield/ brownfield sites, and sustainability elements through a 'Balanced Green Growth' approach. We note that the new development allocations are focussed within the Regeneration Areas and Centres, which is likely to lead to a more efficient use of land and in improving the sustainable travel options.

Sustainable transport

We acknowledge that the Draft Local Plan has specifically focussed on policies to tackle climate change by reduction in carbon emissions, improving sustainable modes of transport, development of energy efficient buildings, etc.

Policy STR3 sets out the need for planning applications to demonstrate how the development ensures adequate accessibility and connectivity, measures to improve sustainable transport, and requirement to produce a Transport Assessment and Travel Plan where necessary, and we welcome this. References have been made in Policy STR3 on how developers are expected to create an environment that encourages walking, cycling and public transport when designing their schemes.

Policies STR4 (The Efficient Movement of Freight and Logistics), STR5 (Creating Coherent Networks for Cycling and Walking) and STR6 (Influencing the Demand for Travel and Travel Choices) sets guidelines on improving the sustainable transport. 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](#).

Potential impact on the SRN

Based on our review of the Draft Local Plan and the Policies Map, we have identified a few sites from that may have the potential to impact the operation of the SRN in the area. The table overleaf (Table 1) contains the list of potential new housing sites that are likely to have an impact on the SRN in terms of traffic and / or boundary related matters. Please note that we have not included the employment sites in this table as the anticipated land-use and size of developable area are unavailable at this stage. Nonetheless, impacts are expected from employment sites identified in Policy SEC 1-2,3,5,7,9 and 10 as a minimum.

Should the housing sites listed in Table 1 proceed to the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for any mitigation if required. Whilst we have identified the immediate SRN junctions in close proximity to the housing site allocations where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.

Table 1: List of potential new housing allocations in the Sandwell Draft Local Plan (2022 – 2041) likely to have an impact on the SRN in the area

SI no.	Site Ref (Site Assess. Ref}		Site Name and Address	Town	Indicative Capacity (net homes)	Employment land (Ha.)	Type of potential impact on SRN (Traffic and/ or boundary)	Immediate SRN junctions likely to be impacted
1	SH18 (SA 55)		Friar Park (STW/SMBC Land), Wednesbury	Wednesbury	630		Traffic	M6 J8, M6 J9 and M6 J10
2	SH35 (SA 85)		Rattlechain site- land to north of Temple Way, Tividale	Oldbury	518		Traffic	M5 J1 and M5 J2
3	SH37 (SA 87)**		Edwin Richards Quarry, Portway Road, Rowley Regis	Rowley Regis	526		Traffic	M5 J2
4	SH41 (SA95)		North Smethwick Canalside	Smethwick	500		Traffic	M5 J1 and M5 J2
5	SH54		Cranford Street/ Heath Street / Canal, Smethwick	Smethwick	115		Traffic	M5 J1
6	SH55		Cape Arm, Cranford Street	Smethwick	170		Traffic	M5 J1
7	SH58		Abberley Street Grove Lane Master Plan	Smethwick	140		Traffic	M5 J1
8	Mixed-use site allocations	SM1 (SA 91)	Chances Glass Works, Land west of Spon Lane, north of Palace Drive	West Bromwich	276	0.7	Traffic and boundary	M5 J1
9		SM2 (SA 199)	Lion Farm, Oldbury	Oldbury	200	2.3	Traffic	M5 J2
10		SM6	Queens Square Living, West Bromwich	West Bromwich	396	0.2	Traffic	M5 J1
11		SM7	West Bromwich Central	West Bromwich	343	0.5	Traffic	M5 J1
12		SM8	George Street Living, West Bromwich	West Bromwich	327	-	Traffic	M5 J1

**** Site for which a planning application has already been put forward partially and decision pending**

Impact Assessment

Any potential site that is anticipated to have an impact on the SRN in the area is recommended to be subject to consultation with National Highways, and appropriately assessed in line with the Department for Transport (DfT) Circular 01/2022 to determine the extent of their potential impacts on the SRN in the area. Depending on the scale of likely impact on the SRN in the area, the applicant/developer may need to identify suitable mitigation measures (if required). It is to be noted that the cumulative impact of the proposed site allocations also needs to be assessed in line with the Circular for understanding the likely traffic impacts on the SRN in the area in terms of capacity & safety and identifying any possible mitigation measures (if required).

We wish to continue to liaise with Sandwell MBC during the development of the Local Plan to understand which sites will be allocated and the potential impacts of these allocations on the SRN. National Highways recommends that a robust transport evidence base in the form of a Strategic Transport Assessment (STA) be produced to support the development of the Local Plan. To support this key piece of work we would recommend the setting up of a Transport Working Group, who can work with Sandwell MBC as the Local Planning Authority to agree the methodology, assessments and infrastructure requirements to support the Plan's development and adoption.

Black Country Transport Modelling Report (2023)

We note that the Black Country Transport Modelling Report (2023) has been submitted as an evidence base to support the Local Plan and includes the draft scenario assessment, and we welcome this. We acknowledge that the modelling exercise will further be revised in the future as the Local Plan progresses and we look forward to hearing more on this in the Regulation 19 consultation. We have undertaken a high level review of this report and have the following comments:

1. There isn't enough information available to understand the list of development allocations considered for the modelling exercise. Tables 2-2 and 2-3 of the report indicate the level of population and employment growth on a high-level basis, however no supporting appendices are available that list the development allocations included. Table 2-1 provides a list of the transport schemes coded within the model, and note that M5 J1 has been included in this list as a highway scheme. However, no further detail on the scope/extent of improvement is available. National Highways request clarification.
2. Table 2.1 details the transport schemes added to form the DS network. Several schemes were not included due to agreement between BCLA and the consultants, "...due to negligible impact on the network." National Highways request some justification/documentation of these decisions.

3. Based on the information set out in section 1 of the report, it is to be understood that the modelling exercise was undertaken to support the Black Country Plan allocations proposed at the time. Also, the modelling report is dated 10 Jan 2023 and therefore, it's highly unlikely that the current set of development allocations proposed in Sandwell and Dudley Draft LP has been included within the development uncertainty log of this PRISM model. National Highways request clarification.
4. Assumptions are only discussed where they differ from the RC work detailed in the previous stage. Our technical partners, are therefore unable to review the unchanged parameters such as highway generalised cost, PT fare, values of time, vehicle operating cost and bus speed etc.. National Highways request this information is provided.
5. Highway model convergence: delta and link cost stability is achieved, but link flow stability (>98% of link with link flow change <1% for 4 successive iterations) appears to be still improving (Tables 3-3 and 3-4). Stopping conditions appear to be too lenient.
6. Observation on numbers of iterations: the DM scenario appears to reach convergence much quicker than the equivalent DS scenario. This is counter intuitive, as the DM and DS have the same levels of development, with the DS having additional transport schemes. Additional capacity usually aids convergence. National Highways request further information from the model appliers.
7. Highway network statistics: average speeds (calculated by veh-km/veh-hr) decline between the RC and DM and the DM and DS. National Highways request some justification/commentary from the model appliers.
8. Flow difference plots. We note the commentary on page 29 and agree. National Highways request results of investigations into the model noise be supplied.
9. Journey time results seem to show that DS has slightly worse network performance than DM, which would benefit from explanation from the model appliers and National Highways requests this. Some large differences also support the previous comments about model noise.
10. If possible, National Highways requests the models are made available for review.

Infrastructure Delivery Plan – Part 1

Policy STR 1 has identified the need for improvements at M5 J1 and J2 to be delivered during the plan period. Following the identification of the improvement measures, we welcome you to have discussions with National Highways at an early stage.

We note that an Infrastructure Delivery Plan (IDP) – Part 1 (Infrastructure Assessment Need) has been submitted along with the Regulation 18 Draft Local Plan. Part 1 of the IDP reflects an understanding of baseline infrastructure capacity and needs within Sandwell and ensures that the implications of future growth upon infrastructure are understood. We understand that Part 2 of the IDP will include an Infrastructure Delivery Schedule and will be published alongside the upcoming Regulation 19 Pre-submission version of the Local Plan. We appreciate that National Highways will be consulted on any infrastructure improvements identified for the SRN in the area and we look forward to engaging with you at the early stage itself.

For information, there is currently no committed funding for this area within the RIS2 and RIS3 planned period and therefore we are keen to understand the monetary implications and what can and cannot be achieved via developer contributions.

Duty to Cooperate

For any developments which have an impact on neighbouring Local Authorities (LA) National Highways advises a joined-up approach in which National Highways, Sandwell and the other LAs 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 will actively work with Sandwell MBC to develop and draft a Statement of Common Ground (SoCG) to deal with any strategic cross boundary issues as the Local Plan progresses.

Once again, National Highways welcomes the opportunity to comment on the Sandwell Council Draft Local Plan consultation. We look forward to working with the Council in a collaborative manner to aid and support the development and adoption of the Local Plan for Sandwell.

Please do not hesitate to contact me if you require any further information or clarification.

Yours Sincerely,

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