



Our Ref:
Your Ref: Sandwell Local Plan – Regulation 19 Consultation
Extension

Sandwell Local Plan (Reg 19) Public Consultation,
Planning Policy,
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08 November 2024

Via email: Sandwell_LocalPlan@sandwell.gov.uk

Dear Sir/Madam,

Sandwell Local Plan Review - Regulation 19 Consultation (Publication Version)

National Highways welcomes the opportunity to provide comments on the Publication Version of the Local Plan (Regulation 19) prepared for Sandwell Metropolitan Borough Council (MBC), which is expected to cover the plan period from 2024 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 which route through the Local Plan boundary.

In responding to Local Plan consultations, we have regard to the Department for 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 Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

Previous Consultations

National Highways was previously consulted during the 'Issues and Options' consultation in February 2023 and during the 'Regulation 18 – Draft Local Plan' consultation in November 2023. The total demand identified during the 'Issues and Options' consultation was 205.4 hectares of employment land and 30,300 dwellings, and during the 'Regulation 18 – Draft Local Plan' consultation was 185 hectares of employment land and 29,773 dwellings, over the plan period up to 2041.

Regulation 19 Local Plan (Publication Version)

The Regulation 19 Local Plan outlines locally specific policies and both strategic and non-strategic site allocations to meet the housing and employment needs of Sandwell for the plan period from 2024 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. We also note that the Local Plan includes a schedule of policies that remain saved from the previous plans, along with the inclusion of few new policies, as detailed in Appendix N of the Local Plan (Publication Version) document.

National Highways agree in principle to the vision and objectives of the Regulation 19 Local Plan.

Employment and Housing Requirements

Based on our review of the Regulation 19 consultation, we note that the housing and employment requirement has changed since the 'Regulation 18 – Draft Local Plan'

consultation. It outlines a requirement to deliver 211 hectares of employment land over the plan period. This includes 185 hectares identified in the Economic Development Needs Assessment (EDNA) 2023, with an additional 26 hectares of existing operational employment land reallocated for housing and other uses. The housing demand for the plan period from 2024 to 2041 has slightly reduced to 26,350 dwellings (1,464 dwellings per year), which is less than the earlier projection of 29,773 dwellings (1,489 dwellings per year) during the Regulation 18 consultation. We would welcome clarification from you on whether this is based on the latest housing requirement calculation.

Employment

The Regulation 19 Local Plan aims to deliver c.42 hectares of employment land, leaving a shortfall of 169 hectares.

Upon comparing the site allocations for employment land between the Regulation 18 and Regulation 19 consultations, we note that the allocations remain the same with only one site being removed (Site ID: SEC1-4 during the Regulation 18 consultation).

We note that both employment and housing supply identified in the Regulation 19 Local Plan considers existing planning applications, sites under construction, and windfall allowances.

We acknowledge receipt of the comprehensive assessment report submitted in support of the Regulation 19 consultation and appreciate that you have undertaken an integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) to evaluate the different housing and employment growth options. We note that the site allocations have been considered based on the location, the availability of greenfield and brownfield sites, and sustainability, following a 'Balanced Green Growth' approach. It is notable that the new development allocations are concentrated within Regeneration Areas and Centres, which is expected to result in a more efficient use of land while enhancing sustainable travel options. This focus aligns with the plan's broader objectives of promoting sustainable development and supporting local regeneration efforts.

Housing

While the housing demand is set at 26,350 dwellings, the Regulation 19 Local Plan identifies a supply of 10,434 dwellings, leaving an unmet need for 15,916 homes. We welcome the Council's initiative to address this shortfall by working with neighbouring local authorities and Black Country Authorities through the Duty to Co-operate mechanism, which aims to accommodate some of Sandwell's unmet housing needs within their own housing provision. We look forward to receiving an update on this in due course to understand how the impacts from the unmet housing need will be captured.

Table 7 of the Regulation 19 Local Plan indicates that a total of 8,057 dwellings will come through as allocated sites (including sites under construction and with planning permission). However, when reviewing the site allocation details available in Appendix B, this only reflects a total of 7,717 dwellings. We welcome clarity on the allocations and recommend that you update this in the final version of the Local Plan for consistency.

On comparing the site allocations in the Regulation 19 consultation with those included in the Regulation 18 consultation, we note that a few sites have been added and removed however, we have no comments to make on this.

Sustainable Transport

We acknowledge that the Regulation 19 Local Plan has specifically focussed on policies SCC1 – SCC4 to tackle climate change through a reduction in carbon emissions, improving sustainable modes of transport, and development of energy efficient buildings etc.

We note that the following policies remain the same as stated in the Regulation 18 consultation and we welcome this. Policy STR3 (Managing Transport Impacts of New Development) sets out the need for planning applications to demonstrate how the development ensures adequate accessibility and connectivity, measures to improve sustainable transport, and the 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 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.

Impact Assessment

As noted in our response during the earlier consultation, any potential sites anticipated to have an impact on the SRN in the area are 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 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).

Black Country Modelling Report

During the Regulation 18 consultation, the 'Black Country Transport Modelling Report (2023)' was submitted as part of the evidence base, which included the draft scenario assessments. Following our high-level review, National Highways acknowledged that the modelling exercise would be revised as the Local Plan progresses and provided comments which had to be considered in the full scenario assessment process.

As part of the Regulation 19 consultation, we note that a revised modelling report (dated 2024) is available. We have reviewed this along with the following documents:

1. PRISM6 Model Validation Report
2. PRISM6 Future Year Report
3. Transport Modelling to Support Local Plans within the Black Country (July 2024)

Based on our initial checks, we have the following comments where we seek clarity to help us proceed with the review.

- a) Clarification on how the impacts of Covid-19 on forecasts have been accounted for, ideally with reference to the guidance in TAG M4. We note that the report highlights that the previous Local Plan did not account for it, and that this was a red risk factor, but there is no reference to correcting for this, except for asserting that some elements of the lingering effects of Covid-19 are considered as part of NTEM 8.0. That is true, for the Behavioural Change CAS only (ref: Uncertainty Toolkit, para 5.30), but it's a different issue from assessing whether the base from which forecasting is undertaken needs adjustment (which is what M4 appendix B looks at).
- b) Clarification on when NTEM is referred to, which specific version and scenario is being used.
- c) Clarification on the forecasting approach: this appears to be presenting the results of a single forecast. In line with the advice in the Uncertainty Toolkit, what was the decision process for not exploring uncertainty?
- d) Information on the derivation of any new parameters developed, e.g. how were the parameters for new forecast years created, including the sources of inputs to the parameter calculations.
- e) Information that allows us to understand the stability of model outputs, how these change by area, etc. We would expect to see, as a bare minimum, demand model

convergence, highway model convergence and stability, and network statistics (ideally by sector).

We look forward to engaging with you in addressing the above comments to expedite the process.

Infrastructure Delivery Plan (IDP)

During the Regulation 18 consultation, the Infrastructure Delivery Plan (IDP) – Part 1 (Infrastructure Assessment Need) was submitted, which provided an understanding of baseline infrastructure capacity and needs within Sandwell to accommodate the future growth.

As part of the current consultation, we appreciate that an Infrastructure Delivery Plan (IDP) – Part 2 (Infrastructure Delivery Schedule) has been submitted. Table 1 of IDP Part 2 notes that National Highways was consulted by the Council and asked to provide details on any specific transport infrastructure requirements related to the proposed site allocations, including cost estimates. At the time, National Highways indicated that we would confirm the need for mitigation measures following our review of the results of the Strategic Transport Assessment, once completed.

A total of 43 transport infrastructure schemes are included in the IDP Part 2, the majority of which focus on improving active travel and public transport. We acknowledge that specific infrastructure / mitigation requirements are yet to be finalised, as the modelling work associated with assessing the transport impacts of the proposed growth is ongoing. We look forward to receiving the final list.

Policy STR1 of the Regulation 19 Local Plan refers to improvements at M5 Junctions 1 and 2 (Appendix L – Transport Proposals) and we look forward to collaborating with you in identifying feasible mitigation measures.

Duty to Cooperate

For any developments which have an impact on neighbouring Local Authorities (LA), National Highways advises a joined-up approach whereby National Highways, Sandwell and the other Local Authorities attend joint meetings with future developers 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 Metropolitan Borough Council Regulation 19 Local Plan (Publication Version) 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 faithfully

Kathryn Simmonite
Spatial Planner
Email: