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Via Email: [Sandwell\\_LocalPlan@sandwell.gov.uk](mailto:Sandwell_LocalPlan@sandwell.gov.uk)

Dear Andy

**Consultation on Sandwell Council's proposed main modifications to the Sandwell Local Plan (Regulation 19)**

National Highways welcomes the opportunity to comment on the proposed main modifications to the Sandwell Local Plan. The Plan outlines the key challenges and opportunities facing the borough and sets out a spatial strategy to guide future growth up to 2041.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the Infrastructure Act 2015. We are the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). Our role is to ensure the safe and efficient operation of the SRN, while supporting sustainable economic growth.

Our primary interest in relation to Sandwell is the operation of key SRN routes, including the M6 Junction 10 and M5 Junctions 1 and 2. The Plan also acknowledges the importance of the West Midlands Key Route Network (KRN), which provides connections to the SRN. In responding to Local Plan consultations, we have regard to the National Planning Policy Framework (NPPF) and Department for Transport Circular 01/2022, *The Strategic Road Network and the Delivery of Sustainable Development*. Paragraph 26 of the Circular emphasises the importance of early engagement with National Highways to understand how land use proposals may affect road safety and network performance.

The Sandwell Local Plan proposes three main modifications to ensure the plan's soundness and legal compliance:

- Allocation of part of Rowley Regis Golf Course for housing development
- Revisions to Policy SCC4 – Embodied Carbon and Waste
- Replacement of Hill House Farm as a habitat bank for Biodiversity Net Gain

**Allocation of Part of Rowley Regis Golf Course for Housing Development**

A portion of Rowley Regis Golf Course, located at Tippet Green, Rowley Regis, is proposed for residential allocation for 250 new homes. This site was previously identified as a

reasonable alternative during the Regulation 19 consultation and has been assessed in the Sustainability Appraisal Addendum. The appraisal identified some mixed effects but concluded that the allocation would not significantly alter the overall sustainability performance of the Plan.

With regard to the SRN, transport modelling undertaken as part of the transport evidence base for the Local Plan (Black Country Modelling Report) indicates that the proposed development, including the Rowley Regis site, may have minor impacts on the SRN, specifically at M6 Junction 10 and M5 Junctions 1 and 2. However, these impacts are not considered significant. While some increases in congestion are anticipated during peak periods, overall SRN performance is expected to remain within acceptable parameters.

### **Revisions to Policy SCC4 – Embodied Carbon and Waste**

Policy SCC4 has been amended to strengthen its commitment to reducing embodied carbon and managing waste. The Sustainability Appraisal concluded that these changes are unlikely to result in significant effects and that the policy continues to align with the Plan's sustainability objectives. National Highways has no further comments on this matter.

### **Replacement of Hill House Farm as a Habitat Bank for Biodiversity Net Gain**

Hill House Farm has been removed as a potential habitat bank and replaced with Ray Hall Pastoral Land. The Sustainability Appraisal reviewed this change and found no significant impact on the Plan's sustainability performance. National Highways has no further comments on this matter.

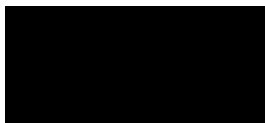
### **Infrastructure Requirements and Evidence Base**

The SLP is supported by an Infrastructure Delivery Plan (IDP), which sets out the infrastructure requirements arising from proposed development. This includes consideration of transport, utilities, education, and green infrastructure. The IDP is a key part of the evidence base, helping to ensure infrastructure is delivered in step with growth.

The Plan is further underpinned by a comprehensive evidence base, including transport modelling, sustainability appraisals, and environmental assessments, to support sound policy development and alignment with national planning policy.

We have no further comments at this time and trust the above is helpful in the continued progression of the Sandwell Local Plan. We look forward to ongoing engagement, including through the development of your Local Transport Plan.

Yours Sincerely

A solid black rectangular box used to redact the signature of Kathryn Simmonite.

Kathryn Simmonite