

Our Ref:
Your Ref:

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22 May 2025

Via Email: a.evans@sstaffs.gov.uk

Dear Alex

South Staffordshire Local Plan

National Highways welcomes the opportunity to comment on the emerging South Staffordshire Local Plan. The Plan sets out the challenges and opportunities facing the district and outlines the proposed spatial strategy for addressing future growth needs up to 2040.

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.

In relation to South Staffordshire, our primary interest is in safeguarding the operation of key SRN routes, including the M6, M54, M6 and the A5 corridor. In responding to Local Plan consultations, we have regard to the National Planning Policy Framework (NPPF) and DfT Circular 01/2022, *Strategic Road Network and the delivery of Sustainable Development*. Paragraph 26 of the Circular highlights the importance of early engagement with National Highways to understand how land use proposals interact with road safety and network performance.

We appreciate the constructive and proactive engagement from South Staffordshire Council and your consultants throughout the development of the transport evidence base. In particular, we welcome the iterative discussions and technical collaboration over the past several months as part of the cumulative modelling process.

Summary of Work to Date

We note that the transport assessment has involved the use of a cordoned version of the Midlands Region Transport Model (MRTM), supported by supplementary analysis. Key aspects of the work to date include:

- Definition of a revised cordon area to reflect the likely area of influence from planned growth, including SRN corridors and junctions.

- Assessment of committed development, the West Midlands Interchange (WMI) and ROF Featherstone sites, with associated mitigation included where appropriate.
- Development of Local Plan scenarios (with and without WMI/ROF) and sensitivity tests to assess cumulative impacts.
- Base year validation against observed flows, journey times and screenlines.
- Consideration of trip rates and distribution assumptions using MRTM zone structures and refinements at strategic nodes (e.g. A5/A449 Gailey).
- Forecast assessment of impacts at key SRN locations, including M6 Junctions 11–13, M54 Junctions 2/2A, M6 Toll interchanges, and sections of the A5 corridor.

We have consistently emphasised the importance of applying DfT Circular 01/2022 thresholds when interpreting modelling outputs. We welcome that these thresholds have been used to identify locations where material impacts may arise.

Our Position

Based on the current evidence and responses provided to date, National Highways is able to offer support for the progression of the South Staffordshire Local Plan to Examination.

This support is offered on the basis that:

- The strategic transport assessment has taken into account the cumulative impact of Local Plan growth on the SRN.
- The methodology and assumptions have been developed in collaboration with National Highways and are considered proportionate to the level of assessment required at plan stage.
- The outputs identify locations on the SRN where impacts are likely to be material, and where mitigation may be necessary.
- The Local Plan recognises that individual site allocations will require detailed Transport Assessments at the planning application stage, to confirm impacts and mitigation requirements.

Our support is subject to the following caveats:

- Our agreement to the approach and findings does not remove the need for further scrutiny at the development management (planning application) stage, particularly where forecast changes at SRN junctions exceed:
 - an increase of 30 vehicles in any hour,
 - a rise in volume/capacity ratio above 85%, or
 - a 5% uplift in traffic flows.
- The cumulative impact assessment work has demonstrated that several of the proposed allocations are likely to require mitigation to the SRN at planning application stage to facilitate their delivery
- Final approval of any specific access proposals or mitigation schemes on the SRN remains a matter for National Highways during future consenting stages and would be assessed in accordance with Circular 01/22 and the Design Manual for Roads and Bridges

We remain committed to supporting the Council in delivering a sound and sustainable Local Plan, and to ensuring that the SRN continues to operate safely and efficiently. Should the

Inspector require any clarification or further input during the Examination process, we would be happy to assist.

Yours Sincerely

A handwritten signature in purple ink, consisting of the letters 'KS' in a stylized, cursive font.

Kathryn Simmonite

National Highways

Spatial Planner