

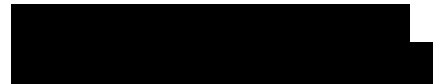


Our Ref: NH/24/05044
Your Ref: Cannock Chase Local Plan

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19 March 2024

Dear Sir/Madam,

Cannock Chase District Local Plan Consultation – Pre-Submission (Regulation 19) Publication Version and associated documents

National Highways welcomes the opportunity to comment on the Publication Version of the Cannock Chase District Local Plan 2018 – 2040 ahead of upcoming public consultations. We note the document is designed to guide and manage the development of the district and is intended to replace the existing Cannock Chase Local Plan (Part 1) 2014 upon adoption by Cannock Chase Council. The new plan contains local planning policies and site allocations which will meet the development needs of the district over the plan period up to 2040.

National Highways has been appointed by the Secretary of State for Transport as 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. 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.

In relation to this consultation, National Highways' principal interest is in safeguarding the operation of the A5 Trunk Road which routes through the area.

Regulation 19 Consultation (Publication Version)

We understand that a Regulation 19 consultation is focused upon the legal compliance and soundness of the Local Plan, and meeting the tests of 'soundness' as set out in the National Planning Policy Framework (NPPF), along with the Council's approach to the 'duty to co-operate'. Whilst we can provide some comments from a transport perspective in relation to the soundness of the Local Plan and the duty to co-operate, we do not consider that we have any comments in relation to the legal compliance of the document.

In responding to local plan consultations, we have regard to the Department for Transport (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 NPPF and other relevant policies, which helps to ensure the soundness of the Local Plan is being appropriately considered (from a transport perspective).

Housing and Employment Requirement

National Highways has previously been engaged during the 'Issues and Options' and 'Preferred Options' stages of the consultation process for the Local Plan. The Preferred Options consultation supported a pattern of development that minimises trip generation at source and encourages the notion to make the best use of existing infrastructure, reduce the need to travel and increase opportunities for non-car travel, to ultimately help to reduce congestion on the SRN. To this end, the consultation supported an increase of development within and adjoining the larger settlements in the area, which benefit from a good concentration of amenities and public transport services.

We consider that focusing housing in urban areas would be likely to have a lesser impact on the SRN than in rural locations or in close proximity to the A5, due to reduced vehicle trip generation and availability of key facilities and services locally, therefore minimising journey lengths for employment, shopping, leisure, education and other activities.

As part of the Preferred Options consultation a total of 6,016 dwellings, comprising 5,516 for local housing needs and 500 to meet the unmet needs of neighbouring areas in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), in addition to up to 50 Ha of employment land, were identified as a minimum requirement to come forward during the plan period.

In the current Publication Version of the Local Plan, we note that a revised assessment has been undertaken wherein the minimum requirement has increased to 6,308 dwellings, comprising 5,808 to fulfil local housing needs and 500 to meet the unmet needs of neighbouring areas in the GBBCHMA as set out in Strategic Objective 3. The Local Plan also provides for up to 69ha of employment land set out in Strategic Objective 4, however Policy SO4.2 references employment land provision of up to 74ha, which we suggest is clarified.

We note that Policy SO4.3 permits the intensification of 16ha of existing employment sites in order to contribute towards meeting employment needs over the plan period. The majority of this existing employment land is located in Cannock and this figure is set to increase over the local plan period as more land becomes available, which is likely to contribute traffic to the A5.

Strategic Allocations

A large proportion of the housing supply is expected to be delivered through strategic residential site allocations. We have reviewed these quantum against those set out at the Preferred Options stage and note that there is an increase in the overall scale of growth to be delivered across strategic residential site allocations. Specifically, we expect that the scale and location of allocations SH1: South of A5190, Lichfield Road, Cannock, for around 700 dwellings and SH2 Land East of Wimblebury Road, Heath Hayes for 400 dwelling are likely to impact upon the capacity of the SRN. This in-turn can create potential congestion and safety issues.

In terms of employment land, we note that a proportion of the supply will be delivered through strategic employment allocations. The Preferred Options stage did not identify any strategic employment allocations, with the current consultation identifying two large strategic employment allocations located in proximity to the A5 which could add

further demand on the performance of the SRN in the area. This is also likely to be the case given that as stated in Policy SO4.2: *“Proposals for new employment development involving distribution (B8) uses and large numbers of HGV movements will be directed to areas with good access to the parts of the Strategic Road Network where impacts upon air quality can be avoided and mitigated.”*

Specifically, Strategic allocation *SE2: Watling Street Business Park Extension* will be accessed via modifications to an existing junction with the SRN (A5). Modifications will need to comply with the DfT Circular 01/2022 and comply with DMRB standards. Similarly, 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.

Policy SO7.7: Amendments to the Green Belt

We also note that site allocation S4: Jubilee Fields, Norton Canes, which is identified as Safeguarded Land is identified to be removed from Green Belt to accommodate growth requirements of the District beyond the plan period or following a review of this Plan. We are aware that proposals for 5.27ha of employment land are currently at pre-application stage, with access proposed directly from the A5. As above, any new access to the SRN will need to comply with the DfT Circular 01/2022 and comply with DMRB standards.

Gypsy and Traveller Pitches

We acknowledge that *‘being in proximity to the A5 transport corridor’* has been added to Policy SO3.4 in the Publication Version of the Local Plan, in relation to reasons why new sites for Gypsies and Travellers and Travelling Showpeople could be allowed within the Green Belt, along with national policy requirements and other material planning considerations. In terms of traffic impacts, we consider the potential impact of allocated traveller’s sites set out in Policy SO3.4 unlikely to result in highway capacity issues on the SRN.

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 [National Highways’ Net Zero Strategy](#). National Highways also welcomes the inclusion of specific policies within the Plan to directly tackle climate change with initiatives such as designing for active travel, electric vehicle charging and designing for green infrastructure.

Objective 5: Supporting the Provision of Sustainable Transport and Communications Infrastructure

We note that *Policy SO5.1: Accessible Development* sets out that developments which generate significant amounts of movements will be required to submit a Transport Assessment (TA) and Travel Plan (TP) to set out clearly how the proposals they include will be implemented, monitored and evaluated. We also welcome the requirement for specific TA's to be submitted in relation to the large-scale strategic site allocations specified in this response. We note that this should also apply to Strategic Allocation SE2.

It will be expected that a TA will identify measures to deal with any anticipated transport impacts of the site and will consider the cumulative impacts of local plan allocations. This will be welcomed by National Highways as a means of safeguarding the efficient operation of the SRN.

We also note the requirement for a Transport Statement (TS) to be submitted for development generating or having a significant effect on vehicle or pedestrian movement or other transport movement, and we welcome this. We recommend that the requirement for a TA (or TS if more appropriate) be extended to include any site which is expected to have a likely impact (traffic and/or boundary related) on the SRN in the area.

We would expect to be engaged in the consultation exercise for these sites to determine the suitability of the assessment and understand the extent of the potential impacts on the SRN. This approach is in line with both the DfT Circular 01/2022 and NPPF guidance, which further helps to ensure the soundness of the Local Plan.

TA's will need to be agreed through site specific pre-application consultation with National Highways. At the planning application stage, the TA will be reviewed in accordance with the current DfT circular. Where appropriate, conditions may be agreed to mitigate any unacceptable impacts that may be identified through the assessment process.

Transport Evidence Base

We would expect that the growth proposals put forward as part of the Local Plan be supported by a robust transport evidence base. As such, we recommend that a Strategic Transport Assessment (STA) be prepared to underpin the transport evidence base. The STA should highlight the transport implications of bringing forward the strategic allocations and identifies the adoption of a modal shift target to ensure that the transport network continues to operate to a satisfactory level.

In this regard, we welcome the inclusion of *Policy SO5.4: Maintaining And Improving The Transport System* within the Publication Version of the Plan. This sets out that the Council will work in partnership with the local highway authority, transport stakeholders, developers, key funding partners and investors, and the local community to maintain and improve the transport system. The policy sets out that planning applications should demonstrate how the development maximises sustainable transport options and states that development proposals will be required to:

“Contribute towards transport infrastructure improvements that are necessary to mitigate the demonstrable impacts of the development upon the strategic and local highway network, public transport services, and cycle and footpath links within and beyond the site.”

The inclusion of this policy within the Local Plan aligns with NPPF guidance and [National Highways’ Net Zero Strategy](#) which helps to ensure the soundness of the Plan, and adherence to this policy would help to support the findings of an STA.

Infrastructure Delivery Plan (IDP)

We acknowledge that the Infrastructure Delivery Plan (IDP) has been updated to 2023 and supports the Publication Version of the Local Plan. This identifies a total of nine highway schemes to be delivered across the plan period in order to facilitate Local Plan growth, including the following improvements on the SRN:

- Churchbridge A5 / M6 Toll / A460 / A34 junction, which borders the South Staffordshire authority area; and
- A5 Corridor Improvements through the A5 Partnership, which comprises 16 local councils and therefore falls into neighbouring authority areas including South Staffordshire, Walsall and Lichfield.

As per our previous consultation on the Issues and Options stage of the Local Plan, we recommend that reference is made to the M54/M6 link road project, which we note falls within the South Staffordshire authority area. This scheme is now subject to further design considerations following the results of consultation on the preferred route announcement. Approval was granted via Development Consent Order (DCO) in April 2022.

Further technical analysis will need to be carried out to identify the need for, location of, and form of any mitigation for the SRN. Accordingly, as the transport evidence base for the local plan evolves through a STA, it may be necessary to further update the IDP.

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. This provides certainty of delivery.

Updated Sustainability Appraisal Report And Habitat Regulations Assessment (HRA) Report

It is noted that the May 2019 version of the Sustainability Appraisal incorporated the DfT Circular 02/13. We now request that Appendix B of the 2024 report be updated to reflect the 01/2022 update to the Circular.

Duty to Co-operate

We acknowledge reference in the Publication Version of the Local Plan to the Council's engagement in the legal Duty to Co-operate process. It is stated in the document that the Council has engaged with partner organisations, statutory consultees and other relevant local authorities. We also note in the *Duty to Co-operate Statement of Compliance* (December 2023) that collaboration between the Council and some partners has been documented through signed Statements of Common Ground (SoCG).

We would welcome engagement with the Council in the development of a SoCG and will continue to work positively with the Council under the 'Duty to Co-operate' as the Local Plan progresses. The document would include details of how the Councils have responded positively to comments and representations made by National Highways as part of the Development Plan review process, the approach to collaborative joint working on the preparation of additional evidence, and agreement on where future collaborative work will focus.

For any developments which have an impact on neighbouring local authorities, we advise a joined-up approach in which National Highways, CCC and the other local authorities attend joint meetings with the future developer or applicants. This will ensure all parties interests are protected and a combined solution is derived.

General Comments

We note that all references within Local Plan documentation to 'Highways England' should be changed to 'National Highways'.

We are also aware of the potential for cross-boundary impacts of growth within neighbouring authorities. Whilst not within the Cannock Chase District boundary, this

could impact traffic levels on the SRN within Cannock Chase District. Proposed developments include:

- Approximately 300ha employment land at the West Midlands Interchange (WMI) located southwest of the A5 / M6 J12 within the South Staffordshire authority area. This has been approved by DCO;
- Approximately 46ha employment development on land southwest of the A5 / Barracks Lane, within the Walsall authority area. A TA has been submitted in relation to this application;
- 70ha employment-led development, north of Dunston and southwest of the M6 J13 within the South Staffordshire authority area. This site is allocated (E30) within the SSC Local Plan. We note from the Regulation 19 Sustainability Appraisal of the SSC Local Plan that SSC have '*expressed some initial concerns relating to site access and significant highway works would be required*'. A TA is being prepared to address these concerns; and
- Approximately 76ha employment development land at Gailey Lea Lane, on land northeast of M6 J12, situated within the South Staffordshire authority area with frontage along the A5. This has been assessed as part of the SSC Regulation 19 Local Plan submission (as E58a) but has not been allocated. SSC has expressed concerns regarding cumulative impacts on the surrounding network and a TA is being prepared to address these concerns.

Summary

From our review of the growth proposals put forward as part of the Publication Version of the Local Plan, we welcome the development of an evidence base in the form of a STA to assess the cumulative impact of the strategic allocations and the identification of subsequent schemes which aim to provide traffic mitigation along the A5. We would welcome engagement in the development of a STA to ensure its suitability for underpinning the transport evidence base for the Local Plan.

In addition to the above we will actively work with you to develop and draft a SoCG through the Local Plan process.

We also acknowledge the commitments in the Local Plan regarding submission of a TA / TS and TP. This will help to ensure that any potential impacts on the SRN are identified and managed, thereby safeguarding the operation of the SRN. Emphasis on the provision of sustainable transport options as part of future proposals is also welcomed as a means of reducing trip demand on the SRN.

We have no further comments to provide at this stage and would welcome continued engagement with the Local Planning Authority in order to support the delivery of the planned growth.

Once again, National Highways welcomes the opportunity to comment on the Cannock Chase District Local Plan Regulation 19 Consultation. In addition, we are looking forward working with you in a collaborative manner to aid and support the development and adoption of the new local plan for Cannock Chase.

In the meantime, if you have any questions or comments then please do not hesitate to contact me on the details provided, and through our email address PlanningM@nationalhighways.co.uk

Yours sincerely,



Patrick Thomas
Spatial Planner

Email: 