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BY EMAIL ONLY

Dear Mr Mellor,

**Draft Dudley Local Plan: Regulation 18 Consultation**

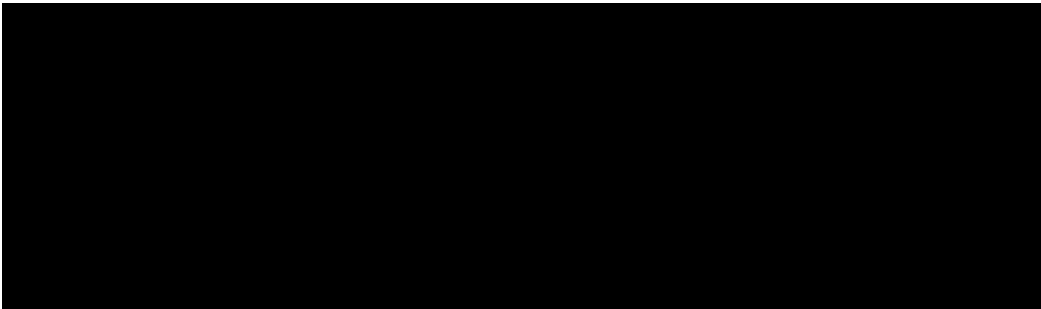
Worcestershire County Council (WCC) welcomes the opportunity to comment on the above consultation and we look forward to ongoing engagement with Dudley Metropolitan Borough Council (DMBC) as a neighbouring authority as the Local Plan develops.

Set out below are officer-only comments from WCC's Minerals and Waste Planning Policy team, Transport Planning Unit, and Worcestershire Children First.

We trust that our response will be helpful and assist you with preparing your Local Plan. We look forward to working with you through the remainder of the plan-making process.

If you require any further clarification on these points, please do not hesitate to contact me.

Yours sincerely,



## Waste

### Cross-border waste movements

We welcome the commitment in paragraph 17.1 that *“The Council will work collaboratively with other Waste Planning Authorities to address the identified waste infrastructure needs.”* WCC will be responding to Dudley Borough Council’s Duty to Co-operate letter on this issue.

### Policy DLP75 ‘Waste Infrastructure - Future Requirements’

Part 1 of policy DLP75 ‘Waste Infrastructure - Future Requirements’ states that *“Proposals for relevant, major development shall evidence how its operation will minimise waste production, as well as facilitating the re-use and recovery of waste materials including, for example, through recycling, composting and energy from waste.”* It is not clear if this policy relates to on-site provision of recycling, composting and energy-from-waste facilities, to or enabling waste segregation at source and supporting collection. Although there are examples of relatively small-scale energy from waste plants being integrated into mixed-use developments, additional clarity about when on-site energy from waste provision would be an appropriate option on major development sites would be helpful, due to its particular characteristics.

Part 2(e) of the policy states that *“waste must be disposed of, or be recovered in, one of the nearest appropriate facilities, by means of the most appropriate methods and technologies, to ensure a high level of protection for the environment and public health.”* Whilst this makes sense in terms of locating waste management facilities within proximity of the waste sources to minimise transport distances, it is unclear how the policy would apply in practice.

We support part 2(g) of policy DKP75, which refers to *“working collaboratively with neighbouring authorities with responsibilities for waste who import waste into, or export waste out of, the borough, to ensure a co-operative cross boundary approach to waste management is maintained.”* WCC welcomes further engagement on this through, and support the commitment in paragraph 17.16 of the Justification towards *“ongoing collaboration with relevant local authorities under the Duty to Cooperate”*. We remain committed to this cooperation, including through any successor alignment regime that may follow the DtC.

Paragraph 17.26 of the Justification states that *“The identification and delivery of new waste management facilities will contribute towards meeting new capacity requirements set out in Policy DLP75 and will help meet the strategic objectives of the Plan.”* But we note that Policy DLP75 does not set out new capacity requirements. It does refer to the requirements, but the policy does not state

what they are. In WCC's experience, Local Plan inspectors may want to see specific numbers within the policy itself.

### Policy DLP76 Waste Sites

Part 1 of the policy refers to the safeguarding of "*all existing **strategic** (as listed in the 'Justification' below) **and other** waste management facilities*" [our emphasis]. The policy does not set different tests depending on whether the waste site is "*strategic*". The Justification, at paragraphs 17.18-17.20, explains why some sites are strategic and goes on to list them, but again does not suggest any difference in approach between a strategic site and any other waste site. If there is no difference in how the policy is applied to strategic and non-strategic sites, then the policy could avoid confusion by simply referring to "*all existing waste management facilities*".

Paragraph 17.20 of the Justification lists the seven types of sites/facilities that are defined as "*strategic*". Part (d) is "*all facilities likely to make a significant contribution towards existing waste management capacity*". It is unclear what could constitute "*significant*". Part (f) is "*a facility forming part of the UK's network of installations for waste disposal, such as landfill sites.*" We are unclear if this network is an 'official' grouping defined by government or industry. If it is, further detail would be welcomed. If it is not, the point could be changed to simply "*a facility for waste disposal, such as landfill sites.*"

The four criteria (a) –(d) under Part 1 of the policy set out the circumstances where waste site safeguarding will not apply. These are:

- a. there is no longer a need for the facility; and*
- b. capacity can be met elsewhere; or*
- c. appropriate compensatory provision is made in appropriate locations elsewhere in the borough; or*
- d. the site is required to facilitate the strategic objectives of the Plan.*

We question whether the "*and*" after criteria (a) should actually be an "*or*". If there is no longer a need for the facility, then it is unclear why the additional circumstances (e.g. providing capacity elsewhere) would be necessary.

Criteria (d) appears to be very broad in scope, due to the high-level nature of the plan's strategic objectives. This is especially the case with objective 2 "*Enabling Economic Prosperity*" and objective 3 "*Enhancing Places and Communities*". There is a risk that either of these broad objectives could be used to justify the alternative use of a waste site for most types of development coming forward;

we are therefore concerned about the ability to effectively safeguard waste development using this policy and feel this could be strengthened.

Part 3 of policy DLP76 addresses potential land-use conflicts between waste management facilities and other development, referring to housing and other potentially sensitive uses not being permitted “*near to*” or adjacent to existing waste management sites. Footnote 47 seeks to explain what “*near*” means in this context, but this open-ended explanation fails to provide the necessary clarity, leaving it to a case-by-case judgement. The absence of a definitive distance could make the policy difficult to apply. While any distance must necessarily be arbitrary to some extent, either of the upper or lower range of figures cited in footnote 47 (100m or 150m) could be included within the policy as a reasonable ‘rule of thumb’ to trigger consideration of safeguarding. We note that part (3) of Policy DLP81 - concerning minerals safeguarding - sets a single distance of 150m to trigger consideration of mineral safeguarding; this may also be an appropriate distance to apply to waste sites. The potential for the 150m distance threshold to trigger unnecessary and onerous assessments could be avoided by making clear that the assessment would be proportionate; the waste assessments described in 17.25 would allow for this proportionality, such that where a site is within 150m (or whatever fixed distance is included in the policy), but it would clearly not present a waste safeguarding concern, the assessment could be commensurately brief.

Criterion (a) of policy DLP76 part 3 set out that an exemption to waste safeguarding would be where “*a temporary permission for a waste use has expired, or the waste management use has otherwise ceased, and the site or infrastructure is **considered** unsuitable for a subsequent waste use.*” [our emphasis]. It is unclear from the word “considered” whether it is for the applicant to make this judgement, or for the planning authority.

The exemption in criterion (b) of policy DLP76 is where “*redevelopment of the waste site or loss of waste infrastructure would form part of a strategy or scheme that has wider environmental, social and /or economic benefits that outweigh the retention of the site or infrastructure for the waste use and alternative provision is made for the displaced waste use*”. Does the alternative provision need to be qualified to ensure it is suitable to waste management operators? As with our concerns on part 1(d) of this policy, this wording may be too broad. Most housing developments could, and possibly would, argue that they provide wider environmental, social and/or economic benefits and that these benefits outweigh the retention of the waste site. Policies elsewhere in the DLP that support appropriate housing, employment and other non-waste development will need to be taken into account by decision makers. As such, there is arguably no need to include the weighting issue within the waste policy, in the same way that the

weighing of waste safeguarding against a non-waste development does not need to appear in relevant policies for housing and employment land.

We would also welcome clarity on what type of development would “*form part of a strategy or scheme*”. If the policy point is intended to relate only to larger-scale comprehensive regeneration schemes, then this may need to be made clearer. A single dwelling or single business unit could potentially have wider environmental, social and/or economic benefits to be weighed against waste safeguarding.

Paragraph 17.23 of the Justification states that “*Another important material consideration will be whether or not the waste operations are lawful, i.e., whether they have planning permission or a lawful development certificate. For example, if the waste operations are unauthorised and unsuitable for the location, the Council will normally consider taking enforcement action to stop them.*” The second sentence is unnecessary, as enforcement action is a separate issue. If the policy is intended to apply only to lawful waste operations - which we understand to be the case - it may be better to make this clear from the outset (for example in 17.17) and to remove this reference.

#### Policy DLP77 Preferred Areas for New Waste Facilities

Part 1 of policy DLP77 establishes a single “preferred location” for new waste management facilities. The actual effect of this is unclear. It appears that, although the area is preferred by DMBC, there is no specific policy tool that directs development to that location, rather than to any other suitable site. The relevant explanation is given in paragraph 17.36 of the Justification (which follows policy DLP78, not DLP77). Paragraph 17.36 appears to set criteria for when development that is not within the preferred area would be allowed. It states that this may be appropriate “*should opportunities at the ‘Preferred Area’ not be available or suitable for individual proposals*”. These tests are not explained further, and there is no requirement for applicants to provide any particular evidence, should they claim that one or both scenarios apply. More explanation may be useful here.

We would also welcome greater consistency in terminology, as the policy title and Justification refer to “Preferred Areas”, but policy point (1) refers to the “preferred location”.

Parts 2 and 3 of policy DLP77 require proposals to comply with other policies in the DLP (policies DLP75 and DLP78, respectively). Because the plan must be read as a whole, it is unclear why DLP77 needs to remind applicants to comply with any other policies. Parts 2 and 3 are therefore considered unnecessary.

Note there is a typo in paragraph 17.40, which refers to “open window composting”.

## Minerals

### Policy DLP80 Mineral Production - Requirements

Part 3 of policy DLP80 states that new development “will be encouraged” to be resource-efficient. We question whether this is too weak for policy. A stronger approach would be to state that new development “must” be resource-efficient, and require developments to demonstrate how they will satisfy this. This could include a presumption that recycled mineral products will be used unless it can be demonstrated that this is not possible.

Whilst Part 4 of policy DLP80 refers to working with the wider West Midlands Aggregate Working Party, paragraph 18.5 of the Justification only refers to working with the West Midlands Metropolitan Area (WMMA). We recognise the close relationship between WMMA authorities, and the fact that this grouping works together to produce an LAA. We look forward to considering the LAA as a member of WM AWP at such time as it is prepared and would encourage annual updates going forward. However, we question whether paragraph 18.5 should also refer to the WM AWP, which includes other MPAs. The WM AWP is mentioned briefly in paragraph 18.6, but this is only in relation to one specific business.

Paragraph 18.7 states that “*The evidence base has not identified any parts of Dudley Borough that merit being designated as Minerals Safeguarding Areas (MSA - i.e., any workable primary mineral reserves)*”. For clarity, the word “reserve” should apply only to those resources that have planning permission, and that “resources” may be a more appropriate word here. Whilst we agree that, in practical terms, this approach makes some sense, it may not be consistent with national policy. Paragraph 210 of the NPPF does not distinguish between “workable” minerals and “non-workable” minerals. It merely requires the safeguarding of mineral resources of local and national importance (without qualification). If evidence from the BGS or elsewhere suggests that such resources exist, then the NPPF may require them to be safeguarded. The *Black Country Minerals Study: Dudley minerals Update (October 2023)* states, at paragraph 2.1.2, that “*Due to the predominantly urban nature of the Black Country, the only BCA with viable mineral resources is Walsall (sand and gravel, brick clay, fireclay). All other mineral resources and permitted mineral reserves within Dudley, Sandwell and Wolverhampton have now been worked and remaining mineral sites are in the process of being restored.*” We note that the

Planning Inspectors who examined the Minerals Locals Plans in Worcestershire (2022) and Herefordshire (2023) required the proposed MSAs in both counties to be extended to cover all mineral resources of local or national importance, regardless of whether they underlaid predominantly urban areas or were otherwise already sterilised, and regardless of any viability sieving. Paragraph 18.8 refers to “...*mineral resources and sites that are expected to be producing, processing or transporting minerals and mineral products within Dudley Borough will be protected from other types of development that could compromise their continued operation over the plan period.*” (our emphasis). This suggests that resources do exist and raises the question of whether they should be defined as MSAs.

#### Policy DLP81 Minerals Safeguarding

Part 2 of policy DLP81 refers to “*encouragement*” being given to prior extraction. This is a very different tone to the NPPF, which states at paragraph 212 that “Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.” The DLP Justification, at paragraph 18.10, contains clearer tests that should arguably be within the policy box itself.

Part (c) of paragraph 18.10 states that, where prior extraction is not feasible, evidence should be provided that [inter alia] “*prior extraction of minerals would result in abnormal costs and / or delays which would jeopardise the viability of the development*”. Most developments do not include prior extraction of minerals and therefore, by definition, the use of prior extraction would be highly likely to result in “*abnormal costs*”, unless the prior extraction formed part of engineering works that would have been carried out in any event. As such, the threshold for this exclusion is arguably so low that it would effectively provide an automatic exemption to almost every development.

#### Policy DLP82 Managing the Effects of Mineral Development

Part 1(c) of policy DLP82 refers to “*generation of noise, dust, vibration, lighting, and excessive vehicle movements.*” We would suggest the word “*excessive*” would apply equally to the other issues listed in part (c) - as well as to most of the other lettered parts of this policy - as much as it does to vehicle movements. In any event, the word may not be needed, as the assessment of vehicle movements will necessarily involve a judgement on the level of such movements.

Policy points (d) and (g) seem to largely duplicate each other.

Policy point (h) refers to “*impacts on the highway, transport, and drainage network*”. We would suggest that the drainage network is a different type of issue than highways and transport, and does not sit comfortably alongside them.

### Worcestershire Children First

Worcestershire Children First have reviewed the plan. Where housing is proposed, this is likely to have an impact on educational infrastructure. There is an element of cross-border migration of pupils within this region.

Any change to the housing make-up (and particularly the provision of large-scale housing) is likely to affect this and therefore we would appreciate continued inclusion in the review of such impacts.

### Transport

WCC is the Local Highway Authority for Worcestershire and is responsible for operating and maintaining the county’s local road network, both in respect of its current activities and needs, as well as its long-term operation and integrity. We are interested in the potential traffic and transport implications of development proposals and/or policies coming forward through the Local Plan process and need to ensure these are fully assessed, understood and where necessary, managed through the plan-making stage(s).

We note that this consultation follows the cessation of work on the Black Country Plan in October 2022, which was being prepared to set out the joint strategic growth targets and policies for the Black Country authorities including Dudley Council. The Draft Dudley Local Plan (DLP) builds on evidence, policies and consultation feedback from work undertaken for the Black Country Plan (BCP) and the Brierley Hill Area Action Plan (BHAAP) Issues and Options consultation (February 2022). WCC provided responses to both the BCP and BHAAP consultations outlining that WCC would welcome further engagement and information regarding the development of the transport evidence base and the implications of the plans on Worcestershire’s highway and transport network.

The DLP area adjoins Worcestershire’s highway network at the A491 Hagley Road, the A4036 Ham Lane and the A456 Birmingham Road/Hagley Hill. These routes provide the key connections between the county and DLP area that may



be impacted by growth in Dudley, particularly at Stourbridge, Brierley Hill and Halesowen. We are therefore keen to ensure that transport and land use planning policy is closely integrated, so that the impact of Dudley's future planned growth on Worcestershire's transport network is appropriately managed so that the transport network is able to facilitate the delivery of sustainable economic growth across the Plan area.

### Relevant Plan-Making Policy – Transport

Our responses to Local Plan consultations are guided by relevant policy and guidance including the National Planning Policy Framework (NPPF), which was most recently updated in December 2023.

The NPPF sets out that plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees (para 16).

Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including county councils (para 25).

Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary (para 26).

In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these (para 27).

Transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impact of development on transport networks can be addressed. (para 108).

The planning system should actively manage patterns of growth such that significant development is focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. (para 109).

Planning policies should be prepared with the active involvement of highway authorities and other transport infrastructure providers so that strategies and

investments for supporting sustainable transport and development patterns are aligned. (para 110).

Planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use. (para 128).

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. (para 115).

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (including transport). Such policies should not undermine the deliverability of the plan. (para 34).

The transport strategy to support the plan will need to be based on a robust evidence base. As a minimum, in order for the transport evidence base to satisfy the requirements of NPPF, it is necessary to establish:

- The transport impacts of the development allocations.
- The improvements necessary to ensure that the impacts are not unacceptable.
- Any land required for the delivery of the necessary improvements.
- The cost of the necessary improvements.
- Any other deliverability constraints.

### The Emerging Dudley Local Plan

The DLP will provide for an additional 10,876 new homes and 25ha of employment land across the Dudley Council area for the period up to 2041. The DLP is adopting an urban-led approach, aiming to efficiently utilise previously developed land, vacant properties and surplus industrial land that is well connected and well served by local amenities. To this end, future planned growth across Dudley is primarily focussed towards the borough's key towns and economic centres. WCC welcomes an urban-led approach to developing the growth strategy and considers that focussing housing growth and development at sites that are located in proximity to public transport corridors/services and employment opportunities, should offer the best opportunities for reducing the need to travel by private car.

As the DLP is developed, it is imperative that any necessary improvements to Worcestershire's transport network required to successfully deliver sustainable growth aspirations across Dudley borough but particularly Stourbridge, Brierley Hill and Halesowen, are identified, as set out in Government policy, also taking account of strategic growth emerging through the Wyre Forest Local Plan and Bromsgrove District Plan Review. In particular, Worcestershire County Council Highways would welcome further information regarding the intended approach to preparing the necessary transport evidence base and associated infrastructure strategy.

The Draft DLP has been prepared in two parts, with Part 1 setting out the Spatial Strategy and Strategic Policies and Part 2 setting out the Centres and Site Allocations.

### Vision and Objectives

The vision and objectives set the framework for the growth strategy and strategic policies to 2041.

We welcome the inclusion of an overarching principle within the vision which looks to deliver sustainable urban growth and promote more active forms of travel, especially by public transport and by a network of footpaths and cycleways providing connections to the rest of the West Midlands and the countryside around the borough. We also welcome Strategic Priority 7 which aims to support growth by successfully addressing borough-wide infrastructure needs and maximises the efficient use of existing infrastructure capacities, and by ensuring appropriate and timely delivery of infrastructure to support new developments.

The importance of safe, reliable and efficient highway links and transport services is a critical part of realising a number of the other DLP objectives and priorities (for example, creating safe, attractive and sustainable neighbourhoods and addressing the Climate and Ecological Emergency). Given the proximity of the Plan area to Worcestershire and the key highway links connecting the county to Dudley borough, there are potential cross-boundary movements utilising Worcestershire's transport network, particularly the A491 Hagley Hill and A456 Birmingham Road. It is therefore suggested that a specific objective relating to the safe operation and efficient performance of the transport network would also be appropriate. This would mean that the impact of development on the transport network, together with the deliverability/viability of necessary transport interventions, would be key considerations during the development of the growth strategy and infrastructure plan. Such an objective would also help the assessment of individual development impacts when considering the nature of the proposed mitigating infrastructure provision through the planning process.

## Growth Strategy

The Draft DLP adopts an urban-led approach to growth, with the aim of delivering 10,876 new homes and at least 25ha of employment land, to create sustainable mixed communities supported by adequate infrastructure. The emerging spatial strategy focusses growth and development at locations across the borough's identified 'Growth Network' comprising town centres, existing urban areas and regeneration corridors.

Part 1 of the Draft Local Plan outlines the proposed growth strategy as follows:

- The Growth Network
  - Brierley Hill Strategic Centre: 1,636 new homes
  - Dudley Town Centre: 682 new homes
  - Stourbridge Town Centre: 291 new homes
  - Halesowen Town Centre: 261 new homes
  - Regeneration Corridor 1: 585 new homes and 3.08ha employment
  - Regeneration Corridor 2: 854 new homes and 7.73ha employment
  - Regeneration Corridor 3: 514 new homes and 0.59ha employment
  - Regeneration Corridor 4: 100 new homes and 4.1ha employment
  
- Outside the Growth Network: 377 new homes and 2.04ha employment
- Small windfall housing sites: 2,685 new homes
- Large windfall housing sites (Brierley Hill): 200 new homes

WCC Highways considers that focussing housing growth and development at sites in urban centres that are located in proximity to public transport corridors/services and employment opportunities, should offer the best opportunities for reducing the need to travel by private car. However, there may be a number of challenges for identifying and delivering necessary highways and transport infrastructure in relation to windfall housing sites (cumulatively amounting to a significant proportion of the total planned housing growth) where growth may be dispersed across the borough.

In terms of location, employment development often contributes significantly to peak-hour traffic, and hence there can be challenges to accommodating high levels of trip demand, which may only exist for limited periods of the day on the road network. The attraction to business of locating in highly accessible locations is recognised, and we are aware that for many businesses, close proximity to

locally-strategic routes such as the A491 Hagley Road and A456 Birmingham Road is essential.

When considering the transport strategy supporting site allocations across the Growth Network and wider borough locations, WCC Highways requests that consideration is given to the planning of adequate transport infrastructure, including any necessary highway capacity improvements in Worcestershire to provide for cross-boundary movements.

### Strategic Policies

WCC Highways welcomes the inclusion of a strategic transport policy that requires new development to actively promote active travel and sustainable transport and provide safe access for all users. WCC Highways considers the inclusion of a policy which requires new development proposals to assess their impact on the capacity of the transport network and which positively supports proposals that include mitigation against any unacceptable road safety or significant adverse congestion impacts, to also be beneficial.

### Transport Evidence Base

A Black Country Plan Modelling report 'Draft Plan 01 Assessment Technical Note' January 2023 (ATN) has been provided as part of the transport evidence base informing the Draft Dudley Local Plan Consultation.

In response to statutory consultation stages for the former Black Country Plan (BCP) and Brierley Hill Area Action Plan, WCC Highways requested further engagement from the plan-making authorities regarding the approach to developing the transport evidence base and transport modelling, as WCC was concerned that the then-emerging growth strategies may result in potential cross-boundary impacts on Worcestershire's highway and transport network. However, to date, further engagement with WCC Highways has not been undertaken.

WCC Highways notes from the ATN that Sweco, supported by Arcadis, were commissioned by Sandwell Metropolitan Borough Council to undertake the Black Country Plan Modelling (BCPM) for the purposes of understanding the transport impacts of the BCP to 2039, across the Black Country and its surrounding regions, utilising the West Midlands Combined Authority (WMCA) PRISM transport model.

WCC Highways is concerned that the PRISM model network does not extend to Hagley or the northern-most extents of Worcestershire's highway network. In particular, the model network and traffic impact analysis does not fully extend to the routes connecting Hagley to the Stourbridge, Brierley Hill and Halesowen

Growth Network development locations, with the A456 Birmingham Road/Hagley Hill missing from the modelled network extent, and limited analysis of the A491 Hagley Road.

Furthermore, WCC Highways notes that the impact analysis undertaken includes some future potential highway and transport schemes across the Black Country (although the status of these schemes remains unclear and it is noted some schemes have been 'skipped' due to 'negligible impact') as well as the full growth strategy proposed by the former BCP, which is no longer being pursued. WCC Highways is therefore unable to identify the traffic impacts of the Draft DLP growth on Worcestershire's transport network or the necessary infrastructure required to support and accommodate planned development, particularly in the Growth Network development locations.

Based on the analysis provided within the ATN, it is not possible for WCC Highways to confirm if the sections of modelled network connecting Hagley to Dudley growth areas is adequately calibrated. It is noted that there are limited changes to journey times on the A491 Hagley Road and the modelled section of the A456 east of Hagley in the 2032 and 2039 do-minimum scenarios compared to the reference case. WCC Highways would be interested to explore if these minimal journey time changes are as a result of the assumed delivery of highway and transport schemes in advance of emerging allocations being brought forward, or if they may be due to other model anomalies. In addition, WCC Highways would welcome the provision of ATN appendices, which include flow difference plots and volume capacity ratio plots for all modelled scenarios.

As previously requested, WCC Highways would welcome further engagement with Dudley Council with the aim of exploring the approach to the development of the transport evidence base supporting the Draft Plan and to understand whether further transport modelling is proposed to underpin future plan-making stages, that is focussed on assessing the impact of planned development across Dudley and its neighbouring areas.

Should further transport evidence base development be progressed utilising the PRISM transport model, or if it is proposed to develop the Plan's supporting transport strategy using the transport evidence presented in the ATN, WCC would welcome receipt of the Local Model Validation Report, data collection reports and any forecasting reports which may be available.

#### Transport: Next steps

The County Council requests that as the Dudley Local Plan is progressed, we are engaged by Dudley MBC to help determine any potential impacts on Worcestershire's transport network and identify any necessary infrastructure improvements to be included within the Infrastructure Delivery Plan. In particular,

we would welcome an early opportunity to review the PRISM transport model, Local Model Validation Report and any forecasting reports that may be available should the transport evidence base and transport strategy supporting the Dudley Local Plan continue to be progressed on the basis of the BCPM.