

22<sup>nd</sup> December 2023

Dear Sir/Madam

**Re: Draft Dudley Local Plan Consultation**

Thank you for inviting comments on the Draft Dudley Local Plan Review: Part One. Overall, we support this plan with many of the proposals referenced fully assisting with the West Midlands Combined Authority (WMCA) goals and aspirations to create a more prosperous and better-connected West Midlands which is fairer, greener and healthier and those within the agreed Core Strategy of the new West Midlands statutory Local Transport Plan (WMLTP5), the draft Six Big Moves and work on the Area Strategies. We especially welcome the positive ambition for improving transport across Dudley, which outlines new opportunities within the coming years, and its bold intent for improving the transport system.

This version of the Dudley Local Plan has also addressed many of our issues highlighted in our previous comments on the Black Country Plan.

Many of the transport proposals referenced will assist in delivering wider economic growth aspirations, including providing over 72 hectares of employment land and 10,876 new homes by 2041 (but appreciating the shortfalls in meeting these figures) together with continuing to help reduce transport impacts on people and places including supporting decarbonisation. We would therefore like to continue this strong partnership working in delivering on both WMLTP5 outcomes and in shaping the transport elements contained within the Dudley Local Plan.

This response by Transport for West Midlands (TfWM), who are the transport arm of the WMCA and the region's Local Transport Authority, consists of comments on the general strategic direction of the Local Plan, as well as some specific technical comments on various modes including public transport services, smart and active travel and the Key Route Network (KRN).

These comments, which predominantly focus on chapter 16 Transport, are now outlined below, with a focus on the questions posed in the consultation. However, we have also

provided comments on other chapters of the local plan, which have implications on our transport network including housing, employment and local centres.

### **Introduction Section**

We welcome Dudley's inclusion of climate change as a consideration in development and planning. We would however recommend a reference to the WMCA's 2041 Climate plan and how the Local Plan aligns with this.

We would further welcome reference of the new WMLTP 5 to provide that regional context within the introduction chapter of the Local Plan capturing our work on this suite of documents. Noting the LTP Core Strategy has been approved by our WMCA Board in February.

## **16. Transport Chapter**

TfWM strongly welcomes reference to the importance of regional transport links being made and how transport projects in the borough may impact other areas of the West Midlands. We must point out however, that our 'West Midlands Local Transport Plan 5 Core Strategy: Reimagining Transport in the West Midlands' has now been approved by WMCA Board, and while other elements of the Local Transport Plan 5 (WMLTP5) are yet to be approved including our Six Big Moves and Area Strategies, these should be adopted by the end of 2024. Once all elements of the WMLTP5 are adopted, Movement for Growth will be superseded by the WMLTP5 which is referred to within this transport section.

Additionally, whilst decarbonisation is mentioned within the Climate Change chapter, a key objective of our LTP is to decarbonise our transport system. We would therefore strongly encourage greater consideration of decarbonisation throughout all of the transport-related strategies and in particular, be mindful of the work WMCA is undertaking as part of Adept's Live Lab 2 programme with the Centre of Excellence for the Decarbonisation of local Roads (CEDR).

### **Introduction section**

We welcome the identified priorities for the development of the transport network. It is important to recognise the impact that national transport strategy has on development in Dudley, but we would also like to see recognition of regional strategy as well, as we discuss above regarding the WMLTP5 suite of documents and the policies contained within them, to further strengthen this transport chapter.

### **Policy DLP67- The Transport Network**

We strongly welcome this Policy and broadly agree with it and the commitment to improving sustainable modes including options for car sharing and potentially micro-mobility. But noting the plan should indicate that the relevant priority rapid transit corridors identified in the LTP5 are as follows:

- Birmingham – Bearwood - Hagley Road – Halesowen
- Walsall – Brierley Hill – Stourbridge, (incorporating Dudley – Brierley Hill)

Longer term proposals further include:

- Hagley Road – Dudley (A4123 corridor)

We also welcome the exploration of road space reallocation for public transport and active travel. Based on the challenges being faced by the region, particularly climate change and decarbonization, it will be difficult to realise improvements without conscious efforts to manage demand for personal vehicle travel.

Cross city bus packages, however, should be moved from the rapid transit section to the Key Road Corridors section as these are not rapid transit.

The aim to provide sustainable and active travel facilities alongside the Metro Extension through Dudley borough is welcomed. But good partnership working with Midlands Metro Alliance to develop these facilities should be explored in this section so good connectivity between different sustainable transport modes can be achieved.

It is very positive that the DLP prioritises highway improvements for public transport and active travel users, rather than drivers. Yet there is mention of transport reflecting existing demand. Within the new WMLTP5 suite of documents, we have adopted a 'decide and provide' (rather than 'predict and provide') approach to new developments and associated transport enhancements to support them. And while we appreciate the reference to KRN aims within Movement for Growth, WMLTP5 takes this more predict and provide approach to road maintenance and development and so this should be reflected throughout the DLP.

Following on from this in paragraph 16.14, we also encourage connection of Designated Strategic Employment Areas with good public transport and active travel connections which should be a key consideration alongside good links to motorways. Noting a fifth of households don't have access to a car, it will be important to explore sustainable transport options to such sites, beyond that of car travel.

We further welcome reference to Park and Ride facilities where appropriate, but noting TfWM should be involved in any conversations regarding any development work which explores new Park and Ride locations, to ensure they are strategically located, take advantage of the links between the SRN and KRN, and help to reduce the number of private vehicle journeys.

It would also be helpful to have reference in this section to Strategic Road Network Designated Routes for Unplanned Events (DRUEs).

We further welcome reference to coaches and their role in providing affordable long-distance connectivity, but we would appreciate more specific policies or actions detailing the promotion of coaches in the borough.

Also, it is important to note in this section some minor amendments are required, and these are as follows:

- Page 328 Amend Bullet points to read
  - West Midlands Rail Executive - Single Network Vision (WMRE 2017)
  - ~~Driving a Revolution in Rail Services for West Midlands - A 30-year West Midlands Rail Investment Strategy 2022-2050 (WMRE 2023)~~
  - Midlands Connect Strategic Transport Plan (updated in 2021/22)
  - Midlands Rail Hub OBC (2022)
- Page 329
  - West Midlands Rail Investment ~~Plan~~ Strategy

It may also be important to note that following the cancellation of HS2 Phase 2, there may be some challenges in delivering all of our rail ambitions across the Black Country. In particular, Phase 2A of HS2 to Crewe would have provided an alternative rail route around the West Midlands conurbation, which in turn would have released some capacity on the Birmingham - Wolverhampton/Walsall – Staffordshire rail corridors that could have been used to improve local and regional rail services and provided a second hourly Wolverhampton – Sandwell & Dudley – London Euston service.

To conclude, clearly several measures are moving in a positive direction in terms of delivering on a good, integrated transport network. Yet by continuing to work in partnership, in areas like local plans/transport plans, we can collaboratively be “bolder” in the actions we take to support and drive behaviour change and respond to those difficult challenges, which in turn will then deliver on shared local, regional and national ambitions using a range of transport, land use and wider public policy levers. Therefore, continued partnership working with TfWM will be essential in this.

### **Policy DLP68- The Key Route Network**

This is a strong policy and we fully welcome this, together with continued partnership working to develop strategies for the KRN. The KRN is important for making journeys across our region and we will continue working closely with Dudley to ensure that the KRN:

- Provides safer and reliable journey times to ensure a consistent customer experience.
- Reflects the ‘Sustainable Transport User Hierarchy’ (as referenced in our 6 [Big Moves](#)) and rebalancing the needs of people, place, and vehicles.
- Is resilient to existing and future challenges, and adaptable to emerging innovations to capitalise on future opportunities.

In terms of public transport, we welcome the importance placed on this mode but we recommend the narrative be strengthened around journey numbers rather than trips, which TfWM can provide on request. We also welcome the emphasis on roadspace reallocation for public transport and active travel.

We would encourage mention of regional road safety aims, such as Vision Zero and a safe system approach. The recently approved Regional Road Safety Strategy by TfWM sets out the vision to eliminate all fatalities and injuries from traffic collisions. The Regional Road Safety Partnership plays a key role in delivering this vision.

Finally, in paragraph 16.23 it mentions collaboration of all four authorities in their role as LHAs in managing the network efficiently. Presumably this is referring to the four Black Country Authorities, but we would also welcome the importance of working collaboratively Dudley’s Local Highway Authority neighbours such as Birmingham City Council and National Highways.

### **Policy DLP69- Transport Impacts of New Development**

It is welcoming to see a strong stance being applied to achieving accessibility for new development and the joined-up approach this policy lends itself to, which in turn, will contribute to the reduction of private vehicle journeys and good built-in public transport and active travel alternatives for all new developments. But sustainable travel should always be prioritised above single occupancy car use and it is important everything is done to achieve this within the policies outlined under this header.

We encourage Dudley to consider active travel facilities beyond just storage facilities for vehicles. There are additional facilities, including showers at workplaces, lockers for storage of personal items, charging for e-bikes, etc. that can also help encourage active travel uptake.

While no direct reference is made to the 'Triple Access System' of accessibility which includes: physical mobility, digital connectivity, and land use planning nor reference to LTP5's Big Move 2: Accessible and Inclusive Places, we can see this policy pays consideration to helping provide enhanced accessibility whilst also addressing the negative impacts of mobility on people and places. Through the Black Country LTP Area Strategy, we will further hope together to be able to capture some of these elements.

### **Policy DLP70- The Movement of Freight**

We welcome this policy, and the role new technologies and modal shift could play in delivering more efficient, and sustainable alternatives, together with the use of rail to fulfil the increase in freight / HGV journeys, alongside that of e-commerce vehicles.

With the noticeable increase in van traffic across the region due to a combination of factors including the increase in online shopping, we welcome the consideration of last mile logistics and shifting freight movements from road transport to more sustainable modes where possible. Improving rail infrastructure will aid in this, but there should be explicit policy from Dudley to facilitate modal shift.

We recognise the use that reinstating disused rail lines can have on improving rail capacity, but we encourage Dudley to set out specific plans for how they will deliver this in the borough. Note that the Wednesbury – Brierley Hill tram line is currently under construction on part of the former railway alignment between Walsall and Stourbridge. Reinstatement of this route for rail freight services would require some form of shared use solution (e.g. use of tram-train vehicles on West Midlands Metro services)

There is omission of policies for suitable HGV parking provision to cater for the area's anticipated use, including as appropriate stop over provision, and amenity facilities to serve the needs of HGV drivers. This is especially important along the key routes of the M5 and M6 so considering policies which could address this would be welcomed.

Under this policy we would also suggest reemphasising the need for greater consideration being placed on time-based policy for freight vehicles using the KRN and other roads, so that there are fewer clashes between peak commuter traffic and freight movements.

While in the justification section in paragraph 16.34 it promotes the use of low emission vehicles and the use of parcel lockers, emphasising this in the actual policy section, along with e-cargo bikes and use of micromobility would further be welcomed, especially for those last mile journeys.

Finally, we encourage consideration of charging needs for sustainably fuelled freight vehicles. Charging provision for personal vehicles is important, but there also needs to be plans in place for where electric LGV's and HGV's will most need to refuel.

### **Policy DLP71- Active Travel**



This is strongly welcomed as a policy but we encourage more explicit mention of partnership working with TfWM and the WMCA.

We also encourage exploration of facilities for cycling that are more than just parking. This can include bike repair stations, showers and lockers for cyclists especially at their workplaces, charging infrastructure for electric bikes, etc together with opportunity for innovation in road space, such as side road zebra crossings, table junctions or shared streets, with policies promoting the trialling of these.

### **Policy DLP72- Demand for Travel and Travel Choices**

Again, we fully welcome many of these policies and are extremely supportive of those measures which prioritise sustainable and active travel options which help contribute to a more reliable performance along our KRN and local roads. We also welcome the ambition to manage demand for road space and car parking, as this will be important for encouraging modal shift and decarbonising the transport system.

It should be noted for new Park and Ride sites (where these maybe explored), TfWM's Park and Ride Strategy states "we will give priority to key intercept locations, rather than local park and ride expansions".

In fact, we continue to explore how we can discourage people from making short car trips to those local station / stops and encourage people to walk, wheel or use public transport instead, and ensure any car parking is available for people only who are travelling from further afield with investment in sustainable modes of travel to the station being the first priority. This approach is taken, as over two thirds of our current user's park and ride sites are travelling 2 miles or less to such sites.

Based on this evidence and our policies in this area, the policy relating to park and ride should be re-worded to say: "identifying appropriate intercept park and ride sites on current public transport routes to ease traffic flows into centres and surrounding areas" and we should not be expanding local park and ride sites in already busy local, residential areas. This policy should also give explicit recognition to TfWM's updated Park and Ride strategy.

Additionally, the policy could be elaborated further regarding the need for more appropriate traffic calming measures and modal filters along residential roads, in addition to wider spatial planning policies. This will improve road safety and discourage cut-through driving. The work of TfWM's Behaviour Change Hub could also be touched upon in this policy through providing key travel planning information, advice and travel clinics as well as support where there is disruption. The Regional Transport Coordination Centre is also a key regional body for managing travel demand on the KRN, as well as for providing information on incidents and planned disruptions.

### **Policy DLP73 – Parking Management**

While these policies on parking management are strongly welcomed, there are no policies which promote parking provision for alternatives to car ownership, such as the use of ULEV car clubs or car sharing as examples. Additionally, whilst this would be complex, considering a workplace parking levy which aims to get more people to leave their cars at home when they commute could be something the local plan considers, and we would welcome exploration of this.

The reduction of long stay car parks is welcomed, but the Dudley Local Plan could be more ambitious and specific in its parking management, particularly for town centres.

Within our LTP Core Strategy, we further promote the managing of car parking more carefully (both in terms of availability and price). While we appreciate removing car parks all together and using the land for other uses, or raising car parking prices can often be contentious at first, they will often encourage more people to use public transport in the longer term. Where many places have undertaken these policies and raised revenue for reinvestment in more sustainable modes of travel, more positive results for both high streets and the wider locality have been achieved so we feel this policy could be strengthened.

There is further nothing relating to the enforcement of pavement parking laws to give that space back to people walking or wheeling or for better enforcement of parking, moving traffic offences and Traffic Regulation Orders together with the digitisation of these to make them more accessible to the wider public, noting proposals in the government's Plan for Drivers documentation. We would especially like to see reference to how Dudley will prepare for and participate in the National Parking Platform and how this can link to the wider network management and customer (Road user) benefits.

This should also coincide with a simplification of on-street waiting and loading restrictions across Dudley – and an agreed alignment across the West Midlands – to ensure drivers are not confused. This will help make enforcement easier and ensure greater compliance from road-users, ensuring there are fewer disruptions on our road networks caused from indiscriminate parking. If the policy section could capture these additions, we feel this could make a significant difference.

### **Policy DLP74- Planning for Low Emission Vehicles**

While we welcome the suggested policies proposed under this section including accommodating Zero Emission Vehicle (ZEV) charging networks, more fundamental shifts in behaviours, including a reduction in car usage will also be required to achieve decarbonisation of the transport network. It should be further noted that ZEVs tend to be larger and heavier and produce higher levels of PM<sub>2.5</sub> than conventional cars and many models require more space for parking, and therefore we should not seek to incentivise individuals to use an ZEV, over public transport and active travel modes.

It will also be important these policies align to WMCA's updated (Draft) ZEV Charging and Refueling Strategy, where Dudley Council was a key partner in its development. This includes ensuring the location of EV charging points are strategically located appropriate to users' needs, i.e. on street parking in densely populated areas without garages for on street parking. Yet also noting that EV chargers can often be seen as part of ever growing "street furniture clutter". Considering more widely those policies on road space reallocation, priority should always be given to active travel and rapid transit before accommodating EV charging on the KRN. This also improves access for more vulnerable road users.

We would also welcome the inclusion of consideration for an ZEV council fleet and its charging needs, as a further policy suggestion.

## **Policy STR10 – Transport Innovation and Digital Connectivity**

The comments regarding how traffic signals can respond to levels of congestion and prioritise sustainable transport modes is supported. Yet at the same time, we would welcome greater information that discusses the proven benefit of this at M5 J1 and how getting signals on UTC allows greater direct influence from signal engineers to support the network at times of need, via integration with Dudley UTC and greater coordination with the RTCC.

### **Other Chapter Comments**

#### **3. Context of the Local Plan**

Within table 4.1 concerning the Dudley Local Plan – Strategic Objectives and Priorities, masterplans are referred to in relation to more details concerning the level of new developments planned, the infrastructure expected to support this and good design through appropriate design codes and guidance. TfWM request being informed of such masterplans, with copies of these and such consultations being shared with appropriate teams to review, to fully assess the impacts these developments may have on our integrated transport network and KRN.

#### **8. Dudley Housing**

##### **Policy DLP11 Housing Density Type and Accessibility**

Point 3.b needs to have a minimum stated of 50 dwellings per hectare not 45 (and should be the same for all 4 Black Country plans). This would make it consistent with Birmingham's plan and 50 dph allows more houses to be built in high density areas, supporting turn up and go frequency public transport.

In many other local plans across England, 50 – 60dph is often applied.

The local plan may also want to consider higher minimum housing densities for areas located along or close to high frequency public transport corridors or near to transport hubs.

We further welcome the ambition to maximise sustainable transport access to new developments, but we recommend developing a public transport accessibility criteria for residential developments. Depending on their location to high frequency transport corridors, stations and centres, this may be of value in the local plan. We are aware of Greater Manchester Combined Authority's *Places for Everyone Plan* which maximises the number of people living in the most accessible places, helping to increase the proportion of trips made by walking, cycling and public transport, and reducing the demand for car-based travel, and TfWM would be happy to work with Dudley Planners to explore such a criteria if it chooses to do so.

Setting standards to deliver on density appropriate developments at certain locations which reflect the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land would be welcomed. Also partnership working with TfWM and the WMCA to share and update Dudley's sustainable transport access modelling is encouraged.

#### **9. Employment**



We overall welcome these policies within the Employment Chapter but feel more emphasis could be placed on improving good, sustainable accessibility to labour markets. The importance of good accessibility to Strategic Employment Areas, Local Employment Areas, and other Employment Areas is not really considered in the proposed policies or justification sections yet given that parts of Dudley has high levels of non-car ownership, we need to ensure that all new employment is fully accessible by sustainable and active travel modes, for as many people to access as possible.

Therefore we would welcome Dudley MBC to capture within its employment policies the importance of wider accessibility by active travel and good public transport to such employment areas.

## **10. Dudley's Centres**

### **Policy DLP10- Centres and Town Centre Uses**

Similar to our comments concerning residential developments, in the general policy for centres across Dudley, public transport accessibility to differing tiered centres could further be considered, with a criteria in place to ensure that they are well served, by the core bus network. Similar public transport accessibility criterias have been developed for other local plans – ensuring varying hierarchies of centres are served by appropriate public transport provision. This could be something Dudley Council may want to consider developing within its local plan.

## **12. Climate Change**

Paragraph 12.5 in the Climate Change section mentions decarbonising transport, but this should also include decarbonisation of transport infrastructure and in particular be mindful of the work WMCA is undertaking as part of Adept's Live Lab 2 programme with the Centre of Excellence for the Decarbonisation of local Roads (CEDR).

Additionally, there needs to be more specific reference made to the climate adaptation requirements for the transport infrastructure.

### **Policy DLP44- Air Quality**

The KRN team welcomes the section relating to Air Quality in the Climate Change chapter and would encourage embedding policy relating to air quality in all transport-related strategies, due to the high percentage of responsibility that transport holds for air pollutants.

## **Appendix 2 – Adopted Dudley Local Plan Policies and Allocations to be superseded by the Dudley Local Plan**

Reference to Stourbridge Ring Road and the proposals to install pedestrian surface level facilities are very welcomed. However, subject to modelling outputs, we would support going one step further and encourage exploration of the feasibility of wider signalisation (inclusive of pedestrian phases) of the Ring Road to enhance network management capability, which will bring public transport as well as wider pedestrian benefits. TfWM would be happy to discuss this further with Dudley Council.

## Conclusion

Overall, we very much welcome the sustainable transport ambitions set out in Dudley's Local Plan for improved connectivity via public transport and active travel infrastructure and we can clearly see many measures in this local plan moving in a positive direction to achieve our WMLTP5 ambitions.

We hope our above policy suggestions and comments, may further help strengthen the plan, and we welcome these being included in the next stage of the local plan. Our work with you on the Area Strategy for the Black Country will further help to improve the relationship between the Dudley Local Plan and the development and delivery of transport strategy across Dudley - be it concerning those key regional transport schemes like rapid transit and our core bus networks or in ways to support more local behaviour change and those measures that can help people move around more sustainably in their local neighbourhoods.

In the meantime, please do not hesitate to contact me if you require further information or clarity on our points raised in the letter and we look forward to continuing working with Dudley MBC on their local plan and through the proposed transport policies.