



Dudley Local Plan Public Consultation
Planning Policy Team
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22 December 2023

Dear Sir/ Madam,

Dudley Council Draft Local Plan Review - Regulation 18 Consultation

National Highways welcomes the opportunity to provide comments on the first draft Local Plan (Regulation 18) prepared for Dudley Metropolitan Borough Council (DMBC), which is expected to cover the plan period up to 2041.

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

In relation to this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the SRN, notably the M5 network which routes along the eastern boundary of the Council limits.

In responding to Local Plan consultations, we have regard to the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the Strategic Road Network 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 National Planning Policy Framework (NPPF) and other relevant policies.

Draft Local Plan

The draft Local Plan contains locally specific policies and strategic / non-strategic site allocations to support the housing and employment requirements across Dudley for the plan period up to 2041. We note that when adopted, this Local Plan will replace all previous local plan documents that the Council has adopted, including the Black Country Core Strategy (adopted in 2011), Dudley Borough Development Strategy and the Brierly Hill, Dudley, Halesowen and Stourbridge Area Action Plans (AAPs). We also note that the Local Plan will contain a schedule of polices that remain saved from the previous plans, along with new supplementary planning documents.

National Highways agree in principle to the vision and objectives of the Draft Local Plan.

Housing and employment requirements

Based on our review of the Regulation 18 consultation, we note that the draft Local Plan consultation document outlines that there is a requirement to deliver 72 hectares of employment land and 11,954 dwellings over the plan period. We note that the housing and employment requirement have primarily been identified based on the National Standard method on housing projections and Economic Development Need Assessment (EDNA) respectively.

While the housing demand stands at 11,954 dwellings, supply for 10,876 dwellings is expected to come through the adoption of the upcoming Local Plan, thereby leaving an unmet need for 1078 homes. The quantum of employment land intended to be delivered through the Local Plan is 25ha, with a shortfall of 47ha. We appreciate that the Council aims to meet the additional housing and employment requirements by working with the neighbouring and other relevant local authorities under the Duty to

Cooperate. National Highways welcomes further information on this once the Council identifies the working arrangement and we look forward to understanding the impacts from these developments on the SRN in the area.

We note that the housing and employment supply identified in the Draft Local Plan has considered the existing planning applications, sites under construction, and windfall allowance. Table 5.1 of the Draft Local Plan indicates how the full housing and employment land requirements for the Dudley Borough will be met through the identified sites. Whilst the housing strategy set out for the 'The Growth Network' and 'Outside the Growth Network' totals to 5,300 dwellings, the housing allocations included in Table 6.1 is summing up to 4,391 dwellings, thereby having a difference of c.900 dwellings. We have noted a similar difference for the employment site allocations also, with 17.54ha set out in Table 5.1 and 14.02ha from Table 8.1 of the DLP. National Highways would need these numbers clarified and would expect more information to be provided on this.

We note that a Sustainability Appraisal process has been undertaken to streamline the different housing and employment growth options and acknowledge that the allocation of sites has taken into consideration the location, availability of greenfield/brownfield sites and sustainability elements. We note that the new development allocations are focussed within the Regeneration Areas and Centres, which is likely to lead to a more efficient use of land and in improving the sustainable travel options.

Potential impact on the SRN

Based on our high-level review of the draft local plan and the Polices Map, we have identified a few sites that may have the potential to impact the operation of SRN. Table 1 contains the list of potential new allocation sites that are likely to have an impact on the SRN in terms of traffic related matters.

Should the sites listed in Table 1 proceed to the final Local plan, during the Regulation 19 process we would expect to see further assessment work carried out to ascertain the impact on the SRN and to determine the need for any mitigation if required. Whilst we have identified the immediate SRN junctions in close proximity to the housing/employment site allocations where there is a chance for likely impact, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.

Table 1: List of potential new allocations in the Dudley Draft Local Plan (up to 2041) likely to have an impact on the SRN in the area

SI no.	DLP Site Reference	Site Ref (Site Assess. Ref)	Site Name and Address	Ward	Type of Allocation	Indicative Capacity (net homes)	Employment land (Floor space sqm)	Type of potential impact on SRN	Immediate SRN junctions likely to be impacted
1	DLP KQH1	206	Ketley Quarry, Dudley Road, Kingswinford	Kingswinford South	Housing allocation	650		Traffic	M5 J2
2	DLP H002	22	Land at Old Wharf Road, Stourbridge	Amblecote		256		Traffic	M5 J2, J3
3	DLP H031	H16.1	Land at Birmingham New Road	Coseley East		472		Traffic	M5 J1, J2
4	DLP H050	400 / SA-373	National Works, Hall Street, Dudley (Nuttalls)	St Thomas's		150		Traffic	M5 J2
5*	DLPE02		Moor Street Freight Depot	Brierley Hill	Employment Allocation		9000	Traffic (Cumulative impact)	M5 J2, J3
	DLPE11		Hard standing area south of Silver End Trading Estate			1700			
6*	DLPE04		Hillcrest Business Park, New Road	Netherton, Woodside and St. Andrews		1600	Traffic (Cumulative impact)	M5 J2, J3	
	DLPE08		Westminster Industrial Estate, Cradley Road, Netherton	Quarry Bank and Dudley Wood		1600			
	DLPE15		Hulbert Drive, Blackbrook Valley	Netherton, Woodside and St. Andrews		3900			
	DLPE16		Graze brook Park	Netherton, Woodside and St. Andrews		1700			
7	DLPE05		Narrowboat Way	Netherton, Woodside and St. Andrews			5000	Traffic	M5 J2, J3
8*	DLPE06		Steel Park Road, Halesowen	Halesowen North			2700	Traffic (Cumulative impact)	M5 J2, J3
	DLPE09		Land off Amber Way, Coombeswood Industrial Park			1800			
9	DLPE10		Land adjacent to railway, Pedmore Road (Blackbrook Salvage)	Netherton, Woodside and St. Andrews			3700	Traffic	M5 J2, J3
10	DLPE12		Land off Timmis Road, Lye	Lye and Stourbridge North		2300	Traffic	M5 J3	

*Sites compiled together as cumulative impacts are expected

Sustainable transport

We acknowledge that the Draft Local Plan has specifically focussed on policies to tackle climate change by reduction in carbon emissions, improving sustainable modes of transport and development of energy efficient buildings which is welcomed.

DLP 67 sets out the need for planning applications to demonstrate how the development ensures adequate accessibility and connectivity, and measures to improve sustainable transport. References have been made in Policy DLP 67 on how developers are expected to create an environment that encourages walking, cycling and public transport when designing their schemes .

Policies DLP 70 (The Movement of Freight), DLP 71 (Active Travel) and DLP 72 (Demand for Travel and Travel Choices) sets guidelines on improving the sustainable transport. We appreciate the effort taken in developing these policies and consider this to be aligned with the expectations set out in the National Planning Policy Framework and [National Highways' Net Zero Strategy](#).

Impact Assessment

Any potential site that is anticipated to have an impact on the SRN in the area is recommended to be subject to consultation with National Highways, and appropriately assessed in line with the Department for Transport (DfT) Circular 01/2022 to determine the extent of their potential impacts on the SRN in the area. Depending on the scale of likely impact on the SRN in the area, the developer may need to identify suitable mitigation measures (if required). We welcome that Policy DLP 69 that all the developments are required to submit a Transport Assessment (TA) or a Transport Statement (TS) along with a Travel Plan (TP).

It is to be noted that the cumulative impact of the proposed site allocations also needs to be assessed in line with the Circular for understanding the likely traffic impacts on the SRN in the area in terms of capacity & safety and identifying any possible mitigation measures (if required).

We wish to continue to liaise with Dudley MBC during the development of the Local Plan to understand which sites will be allocated and the potential impacts of these allocations on the SRN. National Highways recommends that a robust transport evidence base in the form of a Strategic Transport Assessment (STA) be produced to support the development of the Local Plan which should be reflected in their Regulation 19 evidence. To support this key piece of work we would recommend the setting up of a Transport Working Group, who can work with Dudley MBC as the Local Planning Authority to agree the methodology, assessments, and infrastructure requirements to support the Plan's development and adoption.

Black Country Transport Modelling Report (2023)

We note that the Black Country Transport Modelling Report (2023) has been submitted as an evidence base to support the Local Plan and includes the draft scenario assessment, and we welcome this. We acknowledge that the modelling exercise will further be revised in the future as the Local Plan progresses and we look forward to hearing more on this in the Regulation 19 consultation. We have undertaken a high level review of this report and have the following comments:

1. There isn't enough information available to understand the list of development allocations considered for the modelling exercise. Tables 2-2 and 2-3 of the report indicate the level of population and employment growth on a high-level basis, however no supporting appendices are available that list the development allocations included. Table 2-1 provides a list of the transport schemes coded within the model, and note that M5 J1 has been included in this list as a highway scheme. However, no further detail on the scope/extent of improvement is available. National Highways request clarification.
2. Table 2.1 details the transport schemes added to form the DS network. Several schemes were not included due to agreement between BCLA and the consultants, "...due to negligible impact on the network." National Highways request some justification/documentation of these decisions.
3. Based on the information set out in section 1 of the report, it is to be understood that the modelling exercise was undertaken to support the Black Country Plan allocations proposed at the time. Also, the modelling report is dated 10 Jan 2023 and therefore, it's highly unlikely that the current set of development allocations proposed in Sandwell and Dudley Draft LP has been included within the development uncertainty log of this PRISM model. National Highways request clarification.
4. Assumptions are only discussed where they differ from the RC work detailed in the previous stage. Our technical partners, are therefore unable to review the unchanged parameters such as highway generalised cost, PT fare, values of time, vehicle operating cost and bus speed etc.. National Highways request this information is provided.
5. Highway model convergence: delta and link cost stability is achieved, but link flow stability (>98% of link with link flow change <1% for 4 successive iterations) appears to be still improving (Tables 3-3 and 3-4). Stopping conditions appear to be too lenient.
6. Observation on numbers of iterations: the DM scenario appears to reach convergence much quicker than the equivalent DS scenario. This is counter intuitive, as the DM and DS have the same levels of development, with the DS having additional transport schemes. Additional capacity usually aids

convergence. National Highways request further information from the model appliers.

7. Highway network statistics: average speeds (calculated by veh-km/veh-hr) decline between the RC and DM and the DM and DS. National Highways request some justification/commentary from the model appliers.
8. Flow difference plots. We note the commentary on page 29 and agree. National Highways request results of investigations into the model noise be supplied.
9. Journey time results seem to show that DS has slightly worse network performance than DM, which would benefit from explanation from the model appliers and National Highways requests this. Some large differences also support the previous comments about model noise.
10. If possible, National Highways requests the models are made available for review.

Infrastructure Delivery Plan

We note that an Infrastructure Delivery Plan will be prepared and submitted in support of the Regulation 19 consultation for Dudley Local Plan (DLP). Any infrastructure proposals identified for the SRN must be consulted with National Highways to understand the impacts, cost and potential trigger points of when the infrastructure would be required within the plan period. We encourage you to engage early with us to identify any infrastructure required on the SRN.

DLP 67 states that the following priority transport schemes have been identified for delivery on the SRN:

- M6 Junction 10
- M5 Improvements (Junctions 1 and 2, including Birchley Island)
- M54 - M6/ M6 (Toll) Link Road

We acknowledge that the improvements at M6 Junction 10 are under construction through RIS scheme and M54 – M6 Link Road is committed for the second Road Period (RP2). However, for the M5 junctions, we ask you setup discussions with National Highways as soon as possible to enable a successful regulation 19 process.

Duty to Cooperate

For any developments which have an impact on neighbouring Local Authorities (LA), National Highways advises a joined-up approach in which National Highways, Dudley and the other LAs attend joint meetings with the future developers. This will ensure that the interests of all parties are protected, and a combined solution is derived.

National Highways will actively work with Dudley MBC to develop and draft a Statement of Common Ground (SoCG) to deal with any strategic cross boundary issues as the Local Plan progresses.

Once again, National Highways welcomes the opportunity to comment on the Dudley Council Draft Local Plan consultation. We look forward to working with the Council in a collaborative manner to aid and support the development and adoption of the Local Plan for Dudley.

Please do not hesitate to contact me if you require any further information or clarification.

Yours Sincerely,