

Dudley Local Plan: Regulation 19 Public Consultation
Planning Policy Team,
Dudley Council,
Council House,
1 Priory Road,
Dudley,
DY1 1HF

20th November 2024

Dear Sir / Madam

Re: Dudley Local Plan: Regulation 19 Public Consultation

Thank you for inviting comments on the Dudley Local Plan Consultation: Regulation 19 stage following our previous response to your Local Plan Consultation in December 2023. This letter represents a response from Transport for West Midlands (TfWM), the transport arm of the West Midlands Combined Authority (WMCA) which is the region's Local Transport Authority.

Overall, we support this plan with many of the proposals referenced, fully assisting with the West Midlands Combined Authority (WMCA) goals and aspirations as well as those within the agreed Core Strategy of the new West Midlands statutory Local Transport Plan (WMLTP5). We especially welcome the positive ambition for improving transport within Dudley, which outlines new opportunities within the coming years, and its bold intent for improving the transport system.

Many of the transport proposals referenced will assist in delivering wider economic growth aspirations including providing 72 hectares of employment land as well as supporting 10,470 new homes in the borough, together with continuing to help reduce the transport's impacts on people and places including supporting rapid 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 Draft Dudley Local Plan.

Our response to Dudley's Draft Local Plan has been primarily shaped around the emerging WMLTP5 'Reimagining Transport in the West Midlands', with the Core Strategy now setting the tone and approach for the development of transport policy and strategy within the region. The alignment of the Local Plan, West Midlands LTP and the Black County Area Strategy presents an opportunity for us to ensure that land use planning and transport are successfully integrated and continued alignment and partnership working will therefore be important between WMCA and Dudley Council as the Plan moves forward.

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Achieved.
Valid Until
June 2022



The following sections outline our more detailed comments on the Draft Dudley Local Plan Consultation for the issues relevant to TfWM. These are set out in relation to the LTP Big Moves.

Behaviour Change and Accessible & Inclusive Places

Where development is located and how it is designed plays a critical role in shaping people's travel choices and behaviours as well as the ability of the transport system to support and make viable options for sustainable modes. Therefore, we welcome that the Local Plan will focus growth on locations which are well served by public transport, cycling and walking infrastructure and other services and focus on approaches to maximise densities to make efficient use of land and to support more local services and facilities. This will help to deliver against the LTP's vision for a 45-minute region of well-connected neighbourhoods.

The approach around supporting Behaviour Change through information, support and resources is supported and welcome. In addition to the measures listed it is also important to note that there is a need to promote changing travel behaviours in response to unplanned travel disruptions as well as in response to planned events and in particular where disruption could be prolonged e.g. during infrastructure improvements. This would ensure smooth travel experiences for the residents.

The Borough will need to develop its existing transport networks ensuring that they provide an effective, efficient, and comprehensive public transport system, high quality routes and environments for pedestrians and cyclists, and efficient road network and modern digital infrastructure. In addition to improvements to its internal connections, the Borough will need to secure its further improvements in connectivity with surrounding areas, to the rest of the country and internationally in order to attract investment and support access to jobs. Also, attention must be given to mitigating the impact of large transport infrastructure projects on the affected areas encouraging sustainable travel and public transport uptake.

The TfWM Behaviour Change Team will continue education engagement with schools and colleges within Dudley MBC, promoting sustainable and active travel to primary and secondary schools, as well as colleges. Additionally, we will promote any travel incentives to encourage a modal shift for those who attend or work in educational settings.

The TfWM Travel Demand Management team support and influence travel behaviour during times of disruption out on the local and regional network. By analysing data, evidence and operational insights we create bespoke communications and initiatives to change the way people travel away from individual vehicle use and prioritise travel options promoting net zero targets such as shifting to public transport and cycling and walking as well as to reducing and removing journeys. We celebrate the work proposed within the Dudley Local Plan and in partnership with Dudley MBC will assist in promoting journeys for everyone in areas of development.

Walk, Wheel, Cycle and Scoot

This LTP draft Big Moves set a target for everyone in the West Midlands should be enabled to safely access a range of local destinations on foot, in a wheelchair or on a bike or scooter; with the aim of at least half of all trips in our area to be made by active modes by 2030. The aim is noted to promote sustainable transport and the focus on active travel. TfWM look forward to working with the Council in future to support achieving those goals.

It is positive to see Active Travel England (ATE) referenced in the document. ATE is now well-established as a Statutory Consultee on planning applications and has published a range of tools, including for new developments. The Plan should refer to the requirements of ATE for providing or contributing to walking and cycling infrastructure.

Generally, the plan refers positively to modal shift in several places which is welcomed. This would be strengthened and clarified if the plan also stated a clear objective of reducing motor vehicle traffic on the network, as this will then directly support the wider aims of the plan such as decarbonisation and reducing road casualties. We welcome the focus on Active Travel priorities as set out in Policy DL67. With regards to point 3, we would feel that the developments responsibility falls beyond the red line, with a focus on delivering high quality walking and cycling routes connecting the development to offsite destinations such as local facilities, education, and employment. This would provide a dense network of active travel infrastructure alongside that being delivered as part of the LCWIP.

Further comments include:

- **Part one – Dudley Local Plan Regulation 19 – General Comments**
 - The local plan makes no reference to residential streets being designed and restricted to 20mph.
- **Part one – Dudley Local Plan Regulation 19 – Policy DLP69**
 - This policy should have a greater focus on Vision and Validate principles, to reflect the changing nature of how we assess developments.
 - This policy should specifically reference the Active Travel England Planning Application Assessment Toolkit.
 - Point 3 in this policy should include the requirement of an audit of active travel routes to key local destinations (nearest school/shop etc) and request that design recommendations are put forward where deficiencies on the network are identified.
 - Reference should also be made to designing for permeable walking and cycling networks within new developments.
- **Part two – Dudley Local Plan Regulation 19 – Policy DLPD8**
 - This policy should specify compliance of new cycle links with LTN 1.20.
- **Part two – Dudley Local Plan Regulation 19 – Policy DLPS8**
 - Stourbridge high street would be more accessible for those traveling by bike, should contraflow cycling be permitted.
 - Reference to cycle parking should include a requirement for parking for non-standard cycles.
- **Part two – Dudley Local Plan Regulation 19 – Policy DLPH8**
 - We would recommend that this policy refers to accessible cycle parking and 20mph streets.

Public Transport & Shared Mobility

The draft LTP Public Transport and Shared Mobility Big Move identifies a West Midlands public transport system which is made up of three network tiers. These are:

- A Regional Rail and Metro network (with all 10 West Midlands strategic centres served).
- A Core network (mostly core “turn up and go” frequency bus (e.g. cross-city bus), with rapid transit lines for high volume corridors).
- A Secondary bus network (lower frequency bus and Demand Responsive Transport, providing comprehensive network coverage).

These networks will all be underpinned by common and integrated branding, ticketing, promotion, passenger information and high-quality interchanges.

Bus

TfWM welcomes the policies in the Draft Local Plan which seek to support and encourage the use of bus including securing investment from developers where appropriate. Decisions on where and how new development is designed alongside measures to provide priority and reallocate road space can support the region achieve its ambitions to improve bus services and grow bus use in the region. Should the region choose to pursue bus franchising it can provide an opportunity to improve how the bus network is planned and integrated with new developments.

The table related to Policy DLP67 The Transport Network should have a heading for Bus and the West Midlands Core Bus Network and Cross-city bus packages should be referenced under this heading

Paragraph 16.8. should include the following text in red and read as follows: “It is vital that new development has access to high quality sustainable/active travel and public transport infrastructure and services from the outset as this will ensure that people travelling to and from these areas do not establish unsustainable travel patterns”

Paragraph 16.9 should also reference the West Midlands Core Bus Network

Whilst the plan refers to the National Bus Strategy and West Midlands Vision for Bus, there is no reference to the West Midlands Bus Service Improvement Plan (BSIP). For example, Sandwell’s Local Plan states the following: “Therefore, work on the key corridors identified in the West Midlands Bus Service Improvement Plan (BSIP) will play a significant role in delivering this requirement, through a partnership of TfWM, Local Highway Authorities and operators”.

Paragraph 16.26. should include the following text in red and should read as follows: “Improvements will be made to meet the agreed performance specification for the links and junctions involved to support bus services, road based rapid transit proposals such as SPRINT (Bus Rapid Transit) and Metro”

Paragraph 16.26. should include the following text in red and should read as follows: “All improvements to support cycling should seek to adopt the principles contained in Local Transport Note (LTN) 1/20 and infrastructure improvements to support bus services should seek to adopt the principles on how to deliver priority for bus services contained in Local Transport Note (LTN) 1/24.

The document has one plan showing Transport and Movement Key Diagram and another plan showing Active Travel routes. There should be a plan showing the West Midlands Core Bus Network in Dudley as done in the Sandwell Local Plan.

Rail

Whilst representing a smaller proportion of trips overall, rail remains important in terms of access to central Birmingham and the regional rail network provides links between most of our strategic centres and their inner and outer suburbs and the wider journey to work area.

We broadly support the rail elements of the Draft Dudley Local. This West Midlands Rail Investment Strategy includes Midlands Rail Hub and also outlines further future improvements to local, regional and national rail services serving Dudley.

Shared Mobility

Planning policy has a role in helping to reduce the need for people to own a private car by encouraging new development, infrastructure investments and changing land uses to create more sustainable travel behaviours. Shared mobility is a key measure to provide options for travel where traditional public transport is not available or an appropriate option. As such the references to Mobility Hubs/Local Travel Points, car clubs and the West Midlands cycle hire scheme is welcomed. However, we would welcome a stronger reference to the role and approach for encouraging shared mobility in the Transport Chapter.

Summary

Overall TfWM are supportive of the approach set out in the Draft Local Plan document and the ambition to improve connectivity via public transport and active travel infrastructure in Dudley.

TfWM look forward to continuing to work with Dudley Council on the development of the new Dudley Local Plan and delivering improvements to transport through the LTP and Black Country AAP.

If you have any further queries or require any clarifications or additional information, please do not hesitate to contact me.

Yours sincerely

Gurdip Nagra
Principal Planning and Land Use Officer