

Planning Policy Team
Sandwell MBC
Council House
Freeth Street
Oldbury
West Midlands
B69 3DE

18th December 2023

Dear Sir/Madam

Re: Draft Sandwell Local Plan Consultation (Regulation 18)

Thank you for inviting comments on the Draft Sandwell Local Plan Review: Stage 2. 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 Sandwell, which outlines new opportunities within the coming years, and its bold intent for improving the transport system.

This version of the Sandwell Local Plan has also addressed many of our issues highlighted in the Issues and Options stage, or in previous responses to the Black Country Plan and this is very welcomed.

Many of the transport proposals referenced will assist in delivering wider economic growth aspirations including providing over 185 hectares of employment land and 29,773 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 Sandwell 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 11 Transport, are now outlined below, with a focus on the questions posed in the consultation. However, we have also

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

Introduction Section

Paragraph 60 under the header “Sandwell’s Spatial Portrait” it refers to the Strategic Road Network. However, this does not acknowledge the Major Road Network or Key Route Network that operates within Sandwell.

When describing the road network across Sandwell, it should be noted that the WMCA have recently begun a review of the Key Route Network (KRN) and subject to approval, the following changes will be implemented and will affect Sandwell. These being:

- The removal of the B4171 Birmingham Road from its junction with A4100 Henderson Way (Rowley Regis) to its junction with A459 Castle Hill (Dudley)
- NEW KRN: Sandon Road from its junction with A4030 Bearwood Road (Smethwick) to its junction with A4040 Barnsley Road (Birmingham)

Capturing opportunities through our levelling up zones as part of the ground-breaking Deeper Devolution Deal should also be noted, especially for those across the wider Black Country.

Therefore, making sure the Sandwell Local Plan picks up on these changes would be welcomed.

11. Transport Chapter

TfWM strongly welcomes reference to the importance of regional transport links being made and how the borough may impact other areas. 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, and while other elements of the suite of Local Transport Plan 5 (WMLTP5) documents have yet to be approved including our Six Big Moves and Area Strategies, these should all be approved by the end of 2024. Once all elements of the WMLTP5 are endorsed by the WMCA Board, Movement for Growth will be superseded by the WM LTP5.

Additionally, as a general comment whilst decarbonisation is mentioned within the Climate Change chapter, a key objective of our WM LTP5 is to decarbonise our transport system. We would therefore strongly encourage greater consideration of decarbonisation throughout all of the transport-related policies 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

In the introduction section of the transport chapter (11), there appears to be parts of the KRN missing from Figure 13. This may be due to the mapping layers used but we would like clarification that the KRN is correctly designated on Sandwell’s highway network.

Furthermore, on page 17, paragraph 34 (and last bullet point) should be changed to say “Wednesbury to Brierley Hill Metro Extension via Dudley – this will create a direct public

transport route from Wednesbury to the Wolverhampton to Walsall **Birmingham New St** rail line at the Dudley Port interchange”.

Additionally, on page 23 (section 61) this should read “West Coast Main Line” and not West Coast Mainline as is currently the case.

Policy STR1 – Priorities for the Development of the Transport Network

We strongly welcome this policy and broadly agree with it. However, our comments on Sandwell’s issues and options document still stand, where we requested stronger acknowledgement to exploring road space re-allocation for active travel and public transport. Our assessment of the challenges being faced by the region suggests this will be difficult to realise unless there are conscious efforts to reduce overall car dependency.

We would further welcome the plan capturing our ‘15 minute neighbourhood’ concept, together with exploiting the opportunities at regional interchanges to ensure that people can access other services (e.g. health and leisure) by public transport, with this being our ‘45 minute region’ concept.

Paragraph 11.17 should also reference and fully reflect the new West Midlands LTP Core strategy. And likewise, paragraph 11.20 should reference the Bus Service Improvement Plan which outlines a number of positive bus measures being introduced over the next few years to increase patronage and deliver on modal share targets.

While several measures in this local plan are clearly moving in a positive direction towards achieving this ambition, only 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.

While we fully agree that the impacts of Covid 19 have had significant impacts on patronage levels and taking several years to recover, which is talked about in the opening paragraph for this policy, we would welcome some statistics on this and the tone to be framed in a more positive manner, to not diminish the importance of public transport and the opportunities which lie ahead for us. But appreciating that bus services have been particularly impacted by rising fuel and inflationary costs as well as driver shortages and threatening their operational costs and viability. But with continued funding through the transport levy, from our local authority partners we remain positive in delivering a strong public transport network.

Whilst we further appreciate indirect references to our KRN Action Plans, elements of these are now considered (in parts) outdated, and we would welcome a greater emphasis placed on good partnership working with TfWM to deliver on these elements.

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 to Strategic Road Network Designated Routes for Unplanned Events (DRUEs). These routes could be indicated within Figure 13 and referenced in paragraph 11.31.

Finally, we welcome reference to coaches and their role in providing affordable long-distance connectivity. However, there is no policy or action detailing the promotion of coaches which we feel should be included.

Policy STR2 – Safeguarding the Development of the Key Route Network (KRN)

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 will we continue working closely with Sandwell to ensure that this network:

- 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.
- Ensures the KRN 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.

In paragraph 11.23 the RTCC is the Regional Transport Coordination Centre and not the Regional Transport Control Centre, so please alter this.

In paragraph 11.24 reference is further made of providing “fast” public transport. Whilst this was likely intended to suggest that public transport could compete with private transport in terms of journey time, we would not encourage the use of this word. The Regional Road Safety Partnership is working toward Vision Zero and a safe system approach and believes all road users have a responsibility to use the network safely, so more appropriate wording like “reliable”, “dependable” or “consistent” public transport is recommended.

Finally, in paragraph 11.27 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 Sandwell working collaboratively with its neighbouring Local Highway Authorities such as Birmingham City Council and National Highways.

Policy STR3 – Managing Transport Impacts of New Development

It is welcoming to see a stronger 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.

While still 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 our 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, be able to capture some of these elements.

Under this policy, we would also like to ensure that all new development includes safe active travel infrastructure that makes connections to wider cycling and walking networks, as well as providing sustainable access and infrastructure to Park and Ride sites.

Provision of secure cycle parking at new developments is also important with infrastructure being aligned to LTN1/20 and Manual for Streets 2 guidance. The justification section could also provide more details of the risk exposure to cyclists and pedestrians, especially where the KRN provides facilities for fast, high-volume traffic. Providing near miss data (especially at junctions or where collisions involve cyclists and pedestrians) as well as undertaking spatial analysis (which appreciates the top deciles of areas of deprivation) will further be important, as these account for over 50% of all Killed and Seriously Injured in the region, with a reasonable proportion occurring in Sandwell. This data will then help justify a policy for these issues and TfWM can support in obtaining this data insight.

Policy STR4 – The Efficient Movement of Freight and Logistics

We welcome our previous comments on freight and logistics now being incorporated under a separate policy in its own right. We therefore welcome this policy, and the role new technologies 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.

Incorporating a policy which supports new infrastructure on existing railway land, to grow and improve the existing local rail network is welcoming but the policy should also ensure it safeguards new depots or stabling sidings which would then support additional, and longer trains.

There is omission however 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.

Under this policy, the safety of pedestrians should also be captured, as 68% of fatal and serious collisions are a result of heavy goods vehicles.

While in the justification section it promotes the use of e-cargo bikes, low emission vehicles and the use of micromobility to transport goods, emphasizing this in the policies would further be welcomed, especially for last mile journeys.

Finally, under this policy we would 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.

Policy STR5 – Creating Coherent Networks for Cycling and Walking

This policy is strongly welcomed, but its justification should take note that our KRN represents a significant number of journeys being made and is inclusive of bike journeys. Our ambitions focus heavily on delivering a segregated cycle network that matches the KRN, either directly,

or via parallel routes, to serve our region's centres, and so it is promising to see the proposed cycle routes delivering on this ambition.

Exploring further where there could be opportunity for innovation in this space would also be welcomed such as side road zebra crossings, table junctions or shared streets, with policies promoting the trialing of these.

Policy STR6 – Influencing the 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.

Adding a policy which focuses on the importance of the reallocation of road space and providing greater priority at junctions to sustainable transport users may be worth exploring under this section, to strengthen this policy concerning demand for travel.

Yet it should be noted for new Park and Ride sites (where these maybe explored), our Park and Ride Strategy states “we will give priority to key intercept locations, rather than local park and ride expansions”. In fact, we put measures in place to 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 being the first priority. This approach is taken, as over two thirds of our current users are travelling 2 miles or less.

Based on this evidence and our own 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.

The policy could also be elaborated further concerning the need for more appropriate traffic calming measures and modal filters along residential roads. This would improve road safety and discourage cut-through driving.

The work undertaken by TfWM's Behaviour Change Hub could also be touched upon through providing key travel planning information, advice and travel clinics as well as support where there is disruption.

Policy STR7 – Network Management

We are supportive of this policy and are happy to support Sandwell MBC in this duty through the sharing of TfWM assets and resources, as well as exploring innovative approaches together.

Policy STR8 – Parking Management

While many of 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 zero emission vehicles (ZEV) car clubs or car sharing as examples.

Parking issues are also not specific to town centre car parks but are issues along key corridors such as the KRN. Therefore, parking should be seen as a bigger concern, beyond just town centres.

Within our LTP Core Strategy, we 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 much further.

There is further nothing relating to the enforcement of pavement parking laws to give that space back to people walking or wheeling or 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 or to enable more efficient loading and deliveries, noting proposals in the government's Plan for Drivers documentation. This should also coincide with a simplification of on-street waiting and loading restrictions across Sandwell – 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.

Finally considering a workplace parking levy to encourage more people to leave their cars at home when they commute could also be something the local plan explores.

Policy STR9 – 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. It should be further noted that ZEVs tend to be larger and heavier and produce higher levels of PM_{2.5} 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 WMCAs (Draft) ZEV Charging and Refueling Strategy, where Sandwell Council was a key partner in its development. This includes ensuring the location of EV charging points are strategically located.

Finally, TfWM would like to note that EV chargers can often be seen as part of the ever growing “street furniture clutter”. Therefore, with the importance of road space reallocation, priority should always be given to active travel and rapid transit before accommodating EV charging on the KRN and local road networks.

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 further 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 Sandwell UTC and greater coordination with the RTCC.

Other transport related comments

In terms of traffic modelling, the growth estimated from the data TfWM have received in the uncertainty log for our models from local authorities (the log which records housing and employment developments) is considerably different from that of national forecasts. This was first an issue based on the WBHE business case work, and while we have developed an approach to deal with this, we believe we need to re-look at this in the new year. The Black Country Authorities including Sandwell are aware of these issues and it will be important to continue working closely with TfWM's Transport Planning Team (with this function now being brought in-house). Especially in terms of the certainty of development so we can better control the process and requirements and fully align our transport schemes with those of new development coming forward.

Other chapter comments

3. Development Strategy

Policy SDS1 – Development Strategy

Under this policy header, the plan expresses a need to *ensure growth is sustainable by allocating housing in locations with the highest levels of sustainable transport access to residential services (retail provision, schools, healthcare facilities, fresh food, employment etc).*

Whilst fully supporting this, we feel this could be even stronger in that it should seek to ensure that all new development is designed to encourage sustainable travel and that it doesn't make transport worse in any way.

6. Health and Wellbeing in Sandwell

Policy SHW3 – Air Quality

While TfWM fully welcomes air quality being captured in this chapter, we would welcome embedding policies relating to air quality in all of the transport-related policies as well, due to the high percentage of responsibility that transport holds for air pollutants and policies throughout the local plan which favour growth in places which support sustainable modes and reduces the need to travel.

Also, whilst climate adaptation and ensuring the transport system is responding to climate impacts is picked up in chapter 15: Development Management, we need to ensure we reduce our carbon footprint and climate adaption is focused upon concerning transport in more detail, and not linked only to design but captured more generally.

7. Sandwell Housing

Policy SH03 - Housing Density, Type and Accessibility

Within the bullet points (for section 3 of the policy) we strongly feel a minimum of 50 dwellings per hectare and not 45 is recommended as a minimum. In many other local plans across England, 50 – 60 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.

Additionally, developing a public transport accessibility criteria for residential developments – depending on their location to high frequency transport corridors, stations and centres may further be of value in the local plan. We are aware of Greater Manchester Combined Authorities *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.

Setting standards therefore 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 may add value to this local plan. And TfWM would therefore be happy to work with Sandwell MBC on this additional policy, if they feel it is appropriate.

8. Sandwell's Economy

While we have no specific policies we would change in this section, we strongly welcome policy SEC5, in terms of access to labour markets. Yet accessibility could also be captured in the Strategic Employment Areas policies and Local Employment Areas, given that Sandwell has higher levels of non-car ownership than the rest of the West Midlands, so we need to ensure that all new employment is accessible by sustainable and active travel modes, for as many people to access as possible.

9. Sandwell's Centres

Policy SCE1 - Sandwell's Centres

Similar to our comments concerning residential developments, in the general policy for centres across Sandwell, 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 criteria's have been developed for other local plans – ensuring varying hierarchies of centres are served by appropriate public transport provision and could be something Sandwell Council may want to consider developing within its local plan.

Conclusion

Overall, we very much welcome the sustainable transport ambitions set out in Sandwell'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 WM LTP5 ambitions.

Clearly many of our comments from the last version of the local plan have been included and we hope our above policy suggestions and comments, may further help strengthen the plan, and we welcome these being included in the final 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 Sandwell Local Plan and the development and delivery of transport strategy across Sandwell - 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 Sandwell MBC on their local plan and through the proposed transport policies.

Yours sincerely

David Harris
Transport Strategy & Place Manager