

Sandwell Local Plan: Regulation 19 Consultation and Publication
The Planning Policy Team,
Sandwell Council,
PO Box 2374,
OLDBURY
B69 3DE

16th October 2024

Dear Sir / Madam

Re: Sandwell Local Plan: Regulation 19 Consultation and Publication

Thank you for inviting comments on the Sandwell Local Plan Consultation: Regulation 19 stage following our previous response to the Issues and Options Consultation in March 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 Sandwell, 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 42 hectares of employment land as well as supporting 10,434 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 Sandwell Local Plan.

Our response to Sandwell'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 Sandwell 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 Sandwell 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.

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.

Active Travel England (ATE) is not 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 STR1. With regards to point 2, 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.

We have a few suggestions on the wording within the Draft Local Plan, for SMBC's consideration:

- Para 11.19 refers to 'investigating' road space reallocation where physical constraints permit. This should be strengthened beyond investigation to give a strong commitment to the principle.
- Para 11.22 deals with Park and Ride. Reference should be made to providing good accessibility of Park & Ride sites by cycling, with secure cycle parking facilities, as this is in line with the wider transport principles of the plan.
- Para 11.44 refers to 'encouraging' people out of their cars. This should be changed to 'enabled' to reflect the importance of providing people with the facilities they need to make the change.
- Similarly, Paragraph 2 of Policy STR5 should say 'enables'.
- In Para 9 of Policy STR5 the word 'should' should be changed to 'will' to match para 11.51.
- Paragraph 10 of Policy STR5 should add '20mph speed limits' as these have been found to be an extremely cost-effective means of reducing road danger.
- We feel that given the hierarchy of users, Policy STR5 should feature higher up in the list of policies."

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.

Page 328 and the Core Bus Network Plan requires amending to reflect the following:

- The plan shows a route along the A457 Tollhouse Way/Soho Way and then along the B4135 Cranford Street/Heath Street however there are no bus services along this route so this needs removing.
- The plan is missing the current cross-city route from Smethwick (near Rolfe Street Railway Station), through Cape Hill, towards Birmingham (serving buses 54, 82 and 87) and this should be added to the plan.
- The route along Hamstead Road should continue up to the A4041 Newton Road

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 Sandwell Local Plan with the following detailed comments.

- Page 66 - The proposed delivery date for the Dudley Port Integrated Transport Hub should be 2027.
- Page 324 Rail Priorities: the document should explicitly support the West Midlands Rail Investment Strategy 2022-50 (WMRIS) <https://wmre.org.uk/our-strategies/west-midlands-rail-investment-strategy/>

This WMRIS includes Midlands Rail Hub and also outlines further future improvements to local, regional and national rail services serving Sandwell.

- Page 324 Rail Priorities: SLP should ideally support HS2 or an alternative major rail capacity enhancement between Lichfield and Crewe

Without major capacity relief for this congested of the West Coast Main Line through Staffordshire:

- more freight will be forced onto the M6 road corridor
and it will not be possible to meet the objectives of the either
- improve local and regional services between Birmingham Sandwell and Wolverhampton
- provide a second direct London service between Sandwell and Dudley and London.
- Page 330 Policy STR3
 - A policy explicitly encouraging housing development around existing or planned railway stations and metro stops would be welcome.
- Page 331 Policy STR4
 - Amend 5. to read “Existing and disused railway lines and sidings will be safeguarded for rail-related uses”.
 - Amend 7. to read “Existing and proposed rail depots and train stabling facilities will be safeguarded.

- Add Policy 9. “Proposals to address rail network capacity bottlenecks between the West Midlands and Crewe will be supported”

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 Sandwell.

TfWM look forward to continuing to work with Sandwell Council on the development of the new Sandwell 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