

Black Country Core Strategy  
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Our ref: BCCSAug 2017  
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[REDACTED]  
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Dear Sirs/Madam

**Re: Black Country Core Strategy: Issues and Options 2017**

Thank you for inviting comments on the Draft Black Country Core Strategy: Issues and Options consultation. The comments in this response represent the views of Transport for West Midlands (TfWM) - the transport arm of the West Midlands Combined Authority.

We welcome the opportunity to respond to this consultation, given the strategic importance of the Black Country and the key role it plays in delivering the growth agenda, meeting future economic and housing demand and in attracting and retaining investment. It is vital therefore that the Black Country is able to provide the necessary infrastructure and high quality transport links across its four local authorities, around the wider West Midlands and beyond.

**WMCA Strategic Transport Plan “Movement for Growth”**

As a body delivering regional transport, we are pleased to witness clear referencing and alignment of the West Midlands Combined Authority’s (WMCA) Strategic Transport Plan “[Movement for Growth](#)” (MfG) with the Core Strategy. MfG is the long term, overall transport strategy document for the West Midlands and supports the Combined Authority’s “umbrella” Strategic Economic Plan. MfG together with TfWM’s 10 year Delivery Plan will be the guiding documents for other localised transport plans and will help drive strategic transport decisions, along with public transport and active travel measures across the wider region.

The draft Black Country Core Strategy is fully supported by TfWM as its approach for growth and development is clearly underpinned by a sustainable transport system, in accord with our existing policies. There are, however areas where TfWM would welcome positive partnership working with the Black Country, to develop further a sustainable transport approach of the plan, to accommodate the scale of new development planned and support its future growth and prosperity. Our comments for each chapter are now highlighted below:

**2: The Black Country Today – The Existing Strategy**

In tables 3 and 4, TfWM would like to see all three HS2 Connectivity package SPRINT routes schemes included. These should include the Hagley Road Extension (Halesowen, 2), Hagley Road Extension (Dudley to Birmingham) and the (A34) Walsall to Birmingham City Centre scheme.

### **3: The Strategic Challenges and Opportunities**

Within table 1 (Evidence Base for the Black Country Core Strategy Review), TfWM welcomes reference to the Strategic Transport Plan “Movement for Growth” but does however suggest that reference is made to TfWM’s 10 Year Delivery Plan (detailing transport schemes and programmes), the HS2 Growth Strategy and the Black Country Rapid Transit Study. All three documents should also be included in the evidence base and be referenced in policies TRAN1 –TRAN5.

Concerning key issue 2: ‘Meeting the housing needs of a growing population’ whilst we encourage development close to railway stations, we appreciate that this is not always possible. Therefore improved connectivity to stations/interchanges should also be noted, especially for housing and employment sites proposed afar from existing railway stations, with all new housing being inclusive of cycling connectivity.

Finally in terms of Key Issue 6 ‘Reviewing the role and extent of the green belt’, TfWM suggest reference is made to the importance of public transport options for development in the greenbelt, together with the importance of strategic park and ride sites serving greenbelt areas.

### **4. Reviewing the Strategy to Meet New Challenges and Opportunities**

Throughout this chapter, more emphasis needs to be placed on cycling and walking together with public transport, especially in terms of access to new housing and employment development. We feel the Core Strategies vision should reflect all modes. Therefore there should be greater recognition for how active travel could support the Black Country’s growing population and the challenges of capacity felt on the road/rail network.

In terms of delivering efficient public transport, priority as well as capacity for SPRINT and conventional bus services should be given equal priority. Accommodating additional services and making them more reliable is often much harder to achieve than putting on more services. Therefore priority measures for public transport should be much more prominent in the draft Core Strategy than is currently.

When deciding on the location of new developments, consideration to existing cycling infrastructure such as canals and greenways should be clearly part of the criteria of decision making. Also where cross boundary developments do occur cycling and walking infrastructure should be of a similar standard, across all local authorities (those within the Black Country or bordering it) and all should agree to the Cycle Charter principles, to provide regional consistency. TfWM are currently working with the ‘Shire Counties’ to agree a more unified regional wide approach to cycling.

More consideration should also be paid to active travel opportunities on localised journeys. In particular, TfWM would like active travel needs to be designed into street design and layout from the onset to form a ‘Healthy Streets Approach’ as promoted by Transport for London. It should also address any local challenges to cycling such are safety issues, cycle facilities,

topography and behaviour change, for example. TfWM are producing a Health and Transport Strategy which recognises the way people travel is an important part of physical and mental health. Opportunities for greater levels of physical activity during travel can reduce obesity and associated conditions such as heart disease or strokes. Therefore, more emphasis should be placed on active travel - especially those being adopted as part of the canal improvement programme and strategic cycleways on the highway.

Within this chapter, there is also no reference to addressing the wider issues relating to air quality. In light of the Government's recent New Air Quality Plan, it is vital the Core Strategy picks up on air quality and matters relating to this and that any land use changes help to improve air quality and not worsen these problems. Where schemes could reduce air quality, appropriate redesign and/or effective mitigation should be considered along with the importance of changing people's behaviour so that they use cleaner transport options.

In terms of supporting employment and housing growth, 'continuing the role of the growth network' is a more favoured approach by TfWM but we appreciate that other options may need to be explored. If extending into the greenbelt is required, either within multiple smaller settlements (Option H1) or a limited number of large settlements (Option H2), we need to secure significant infrastructure improvements to support such development. Option H2 in particular, with more large scale developments such as SUEs could secure the necessary infrastructure improvements whereas option H1 may not justify large scale transport improvements and encourage only increased car usage.

However each proposed greenbelt location would need to be evaluated individually as to the public transport requirements. Some locations may just need adjustments to existing services, whereas others may involve extensive new networks to the green belt. Nevertheless, for any option it is vital adequate public transport along with active travel modes are considered from the offset and locations are considered first in terms of their access by the canal network/greenways for cycling/walking.

In terms of IA - IB, H1 – H2 and E1 – E4 options, TfWM feel that public transport along with active travel infrastructure should be mentioned in the key challenges and opportunities table. Places located in the greenbelt will be more remote, and the importance of better, multi modal integration should be included in the required infrastructure. TfWM would also welcome positive partnership working with the Black Country, to develop the required sustainable transport approach and support future growth and prosperity.

## **5. Delivering Growth – Infrastructure and Viability**

In terms of the location of affordable housing, greater consideration needs to be paid to active travel and public transport. In some instances, people may not be in a position to own a car and will rely on good public transport to access key opportunities.

The Black Country Core Strategy also places a high emphasis on rail and mass-transit, but it is unlikely that this infrastructure will be viable to meet all the Black Country's development needs. The strategy should not lose sight of the conventional bus network (providing 4 in every 5 public transport journeys across the Black Country) which offers route flexibility and

is responsive to change. Moreover, where there may not be the justification for investing in rail/mass-transit infrastructure new bus routes can be planned to connect new communities and support housing and jobs growth.

TfWM are also committed to delivering Network Development Plans (NDP) across the Black Country to ensure that the bus network continues to meet local needs and adapts to meet future development opportunities. NDP's take a long-term, spatial approach to planning the bus network which will support the Core Strategy, including analysing development quanta and phasing and in fulfilling any potential future growth. Buses, therefore, play a vital tool in supporting plan-making and should not be under played in the Core Strategy. This would mean including a core high frequency strategic bus network within the transport diagrams and within key transport polices and demonstrating the importance of bus priority measures.

## **6. Review of Existing Core Strategy Policies and Proposals**

### **Sprint**

In terms of section E: 'The Black Country Transport Network' we strongly recommend that specific reference to Sprint Bus Rapid Transit be made, as this is seen as a priority to connect the Black Country to HS2. Also paragraph 6.1.38 should refer to A456 to Halesowen rather than Quinton, which is referred to as the Hagley Road Extension (Halesowen, 2) as well as Hagley Road Extension (Dudley to Birmingham) and the (A34) Walsall to Birmingham City Centre.

As Sprint on the A34, A456 and to Dudley are all included in the HS2 Connectivity Package and HS2 Growth Strategy, they should therefore feature as a priority in paragraphs 6.1.36 / 37 / 38 and in table 3: 'Overview of Potential Changes to Existing Core Strategy Policies'. The importance of Bus Rapid Transit Park and Ride sites should also be included in this section.

### **West Midlands Rail**

In terms of rail, West Midlands Franchise Award could see a number of rail improvements serving the Black Country, starting from the 10 December 2017 through to March 2026. This would include more trains between Birmingham and Wolverhampton and Birmingham to Walsall including a new direct service between Walsall and London. Concerning the Snow Hill lines (and subject to wider feasibility studies), services could call at a new station at Merry Hill together with a new station at the West Midlands Safari Park. Also, the new Franchise would support the operation of services along the Walsall – Wolverhampton line, calling at new stations including Darlaston and Willenhall. Despite many of these improvements being subject to further feasibility work, it is recommended they be referenced in the strategy.

### **Key Route Network**

Where the 'Principal Road Network' has been referred to, should this be changed to the 'Key Route Network'. In particular in paragraphs 6.1.24 and 6.1.40.

Greater clarity regarding the West Midlands Key Route Network (KRN) should also be included in the Draft Core Strategy. The KRN covers some 600km of road network (about 7% of the total WM network but carries 50% of all traffic) and incorporates the major local roads including:

- roads making up the designated Primary Route Network;
- all local roads serving motorway junctions;
- main roads forming part of or principal bus network or used by high-frequency bus services; and
- roads serving major education and employment sites.

Although our local highway authorities retain operation and maintenance powers on the KRN, they have delegated the management arrangement to TfWM and we must ensure effective flow of traffic on the KRN. It is also essential that we monitor and report on network performance and develop policies and strategies. Therefore, we must ensure efficient operation of the KRN is not prejudiced by development - whether it is directly through the impacts of traffic generation; or through poor coordination/planning of works to deliver the development.

### **Bus Standards**

It is important that any development should NOT have a detrimental effect on the flow of buses and respect the below policy within MfG:

- Ensuring town centre access for core bus routes facilitates their minimum commercial speed of 16 km per hour am peak journey times;
- Ensuring town and city centre access for SPRINT Bus Rapid Transit lines facilitates a minimum commercial speed of 20 km per hour am peak for proposed SPRINT routes.

### **Other areas of interest**

In paragraph 6.1.36, reference should be made to Highways England Junction improvements for cycling (currently in feasibility development), other cycle highway schemes and cycling/walking links to rail stations/interchanges. Also the significant improvements being made to canals is a step change for the region in making cycling easier and should be referenced in this section.

In terms of the Policy Area E - The Black Country Transport Network text should include the HS2 Growth Strategy as well as the HS2 Connectivity Package.

Finally, where the government's DaSTS is now out of date, the Department for Communities and Local Governments 'Transport evidence bases in plan making and decision taking' should be referenced, to ensure an appropriate assessment of the transport implications are undertaken when reviewing the Local Plan.

## Summary

TfWM supports the vision for the Black Country as contained within the Draft Core Strategy and broadly support its aims and policies. Key areas of interest are:

- TfWM's 10 Year Delivery Plan, the HS2 Growth Strategy and the Black Country Rapid Transit Study should all be included in the evidence base and be referenced in policies TRAN1 –TRAN5;
- More emphasis should be placed on the importance of sustainable transport options within the housing, employment and green belt areas, to support new development in periphery locations. For example bus priority measures, enhanced walking and cycling measures and reference to all three SPRINT Bus Rapid Transit schemes should all be included in the transport policy sections;
- When deciding on the location of developments, consideration to existing cycling and walking infrastructure such as canals and greenways should be clearly part of the criteria for development, especially concerning development in the greenbelt;
- In terms of the development options, sustainable travel modes must be mentioned in the challenges and opportunities tables for all options. TfWM would also welcome a close partnership approach, in developing the required transport to support growth.
- Reference should be made to 'Bus Network Development Plans' to ensure the bus network fully supports all proposed developments across the Black Country; and
- Finally, reference should be made to issues like air quality, clean air zones and healthy streets.

## Local Plan Delivery

We would like to further reiterate our support for the partnership approach that has been taken to addressing the strategic transport needs of the plan and the wider area and would welcome further dialogue as this plan develops.

We would also offer any support required in developing a comprehensive infrastructure plan that enables the successful delivery of the plan. This will clearly need to relate to ongoing work schemes within the 10 Year Delivery Plan, in line with the Strategic Transport Plan. The early development of this infrastructure plan will give potential investors confidence and allow funding and financing packages to be developed and is therefore a crucial piece of supporting evidence.

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

Yours sincerely



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