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**DUDLEY METROPOLITAN BOROUGH COUNCIL**

**MEETING OF THE CABINET - 14<sup>th</sup> DECEMBER 2005**

**REPORT OF THE DIRECTOR OF THE URBAN ENVIRONMENT**

**BLACK COUNTRY STUDY – APPROVAL OF COMMENTS ON THE OPTIONS DOCUMENT**

**Purpose of Report**

1. To seek approval for the Dudley Council response to the Black Country consultation 'Choices' document.
2. To seek member approval for Officers to forward the comments at appendix A to the Black Country Consortium.

**Background**

3. The Black Country Study is the first phase of the review of the Regional Spatial Strategy. In approving the existing Regional Spatial Strategy in June 2004 the Secretary of State stated that future reviews were necessary and that an early review of certain aspects of the document were necessary. He stated that "A particularly important study is underway for the Black Country to assist in resolving the many inter-connected issues affecting this part of the Region. This will advise on a broad range of issues including regeneration priorities, the strategic role of Town Centres and Brierley Hill/Merry Hill, urban capacity, identification of employment land, scope for environmental and town centre improvements, and ways of improving access to regeneration sites particularly on the eastern side of the Black Country" (Para 1.32, RSS, 2004). This study is the Black Country Study.
4. In February 2005 the project plan for the Black Country Study was launched by the Regional Assembly in partnership with the Black Country Consortium and the four Black Country Boroughs setting it out as the first phase of the Review of the Regional Spatial Strategy. Since the launch of the project plan a great deal of technical work has been undertaken which your officers have been involved in. It is now time to consult on this work and the Black Country Consortium are consulting on the spatial options for the Black Country. These spatial options are set out in the spatial options consultation document. The document seeks views on a number of set questions.

5. Members will recall on the 13<sup>th</sup> October 2005 a report was presented to the special meeting of the Cabinet seeking member agreement to use the evidence base and the consultation options document as a basis for consultation. The consultation period runs from the 14<sup>th</sup> November 2005 to the 6<sup>th</sup> January 2006. Dudley Council held a consultation event as part of the local consultation, on the 28<sup>th</sup> November. This event included workshops where stakeholders were asked their views on issues relating to Dudley Borough. The issues raised have been incorporated, where appropriate, in the Dudley Council response to the Consultation. A separate information item on this agenda details all of the main issues arising from this event from all our partners in the Borough.
6. The consultation stage offers the opportunity for Dudley Council to raise specific issues which are particular to the Dudley Borough. The following sets out the key issues raised in the consultation. The Dudley Council response to the consultation is set out at Appendix A.
7. The key issues appertaining to Dudley raised as part of the consultation are as set out below.

### Centres

- One of the key outcomes of the Black Country Study will be the future role of the centres in the Black Country including Brierley Hill. The Black Country vision clearly articulates Brierley Hill as a strategic centre. This status is essential to the future delivery of the regeneration initiatives of the area. This would mean a change in Planning Policy for the Borough's Town Centres. Dudley Town Centre would maintain a focus on civic, leisure and heritage tourism. The confirmation of the centre as a strategic centre will allow retail led regeneration and spread wider regeneration benefits across a wide area. The emphasis on strategic centres within the Black Country Study is considered appropriate, and the strategy for focusing civic, leisure and tourism within Dudley Town Centre is essential. It is essential that this strategy of confirming Brierley Hill as a Strategic Centre is supported. It is also important that the message that Dudley Town Centre is a forward looking Town which is moving forward and focusing on its qualities as a sub regional focus for tourism and leisure development is also clearly articulated. It is essential that Halesowen and Stourbridge have defined roles within the centres strategy and development should be promoted of a scale appropriate to their role in the Borough to meet the needs of Borough residents. Similarly the smaller centres need to be recognised as performing a local service to their communities.

## Transport

- It is anticipated that the suggested growth focussed on Brierley Hill as a strategic centre will require further transport intervention to maintain its future sustainability. Current highway proposals only address the centres needs up to the midlife of the study (2015) and it is assumed that additional public transport improvements building on and complimentary to the delivery of the Wednesbury Brierley Hill Metro in 2011 that link to the main population areas will be encouraged.
- Access to the western side of the conurbation will continue to be a cause for concern with much of the borough being well beyond the 5 to 10 min travel time to the motorway network. Improved road access to the Pensnett Trading Estates building on improvements to the A4123 and A461 should be encouraged to improve the movement of goods to and from that area. It is considered that Highway Improvements could integrate with public transport proposals being sought to address the needs of Brierley Hill and access to employment opportunities within the Black Country. Accessibility to the western side of the Black Country is a key issue for Dudley Borough.

## Industrial/Employment Land

- It is important, from an employment and wealth generation point of view that we retain our high quality industrial areas and portfolio of employment land. The Black Country Study options document suggests that the support of industrial sites is dependent on their location with regard to motorway junctions. It is important that we keep sites such as:
  - Pensnett Trading Estate and Coombs Wood.as well as
  - improve and retain land to the north of Brierley Hill e.g. Hart's Hill, Peartree Lane
- It is essential that the Borough can provide employment land in the right place and the right quality to maintain a competitive economic base for the Borough.

## Housing

- The Black Country Study Vision has set ambitious targets for the increase in the number of dwellings across the four Black Country Boroughs (70,000 additional dwellings for the period up to 2031). The Vision also sets out the need to increase the range of dwellings within the sub-region in order to retain people with higher incomes within the Black Country.

- To achieve these levels of housing, without the need to encroach on Green Belt land, will require massive redevelopment of older housing areas and increases in housing densities in certain parts of the sub-region. More significantly, it will require a large change in land use particularly in older industrial areas. Based on previous trends and research, it is predicted that there will be less employment land required in the future due to the decline in manufacturing and the more compact nature of modern industry. As large areas of current employment land become derelict, the Study has highlighted that such areas need to be given over to housing to meet the increased housing need.

### Environment

- A key element of the Black Country Study is to improve the environment in the Black Country and to create a safe, attractive and healthy place to live and work. Dudley has a wealth of opportunity to tap into this, being rich in geological, natural history. The Borough also has many opportunities in terms of the historic environment, in particular in the Borough's Town Centres. This is an opportunity to fully engage in regeneration of the Borough's assets and heritage.

### Finance

8. The Black Country Study is managed centrally by the Black Country Consortium, which is part funded by this Council and the three other Borough's. Dudley Council provides very significant support in terms of officer time.

### Law

9. The Black Country Study is the first phase of the Review of Regional Planning Guidance for the West Midlands (RPG11) (2004) as advised by the First Secretary of State in RPG 11 (2004). Under Section 38 (3) of the Planning and Compulsory Purchase Act 2004 states that the Development Plan for the Borough consists of Local Development Plan documents and the Regional Spatial Strategy. The Regional Spatial Strategy therefore must be taken account of in the consideration of development proposals in the Borough.

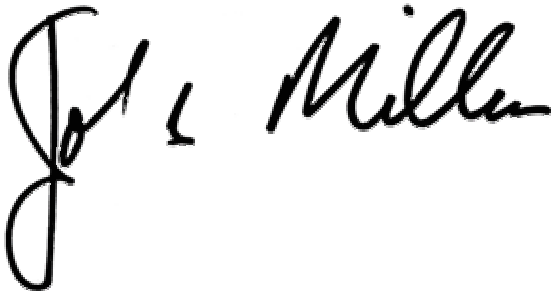
### Equality Impact

10. The Black Country Study seeks to create a positive impact to increase regeneration opportunity in the Black Country, to create a better quality of life and create a more prosperous economic base. Moreover, the study seeks to reverse the trends that lead to social exclusion in the Black Country. The consultation methods employed at a sub regional and Borough level will aid in ensuring that the aspirations of all citizens are taken into account in an inclusive manner. The content of this report complies with the Council's Equal Opportunities Policy.

## **Recommendation**

11. It is recommended that:-

- Members approve the comments made on the Black Country Study Options Consultation as set out in this report and as detailed in Appendix A.

A handwritten signature in black ink, appearing to read 'J. B. Millar'. The signature is written in a cursive style with a large initial 'J'.

**J. B. MILLAR – DIRECTOR OF THE URBAN ENVIRONMENT**

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## **List of Background Papers**

**BLACK COUNTRY STUDY OPTIONS DOCUMENT**



## APPENDIX A

# Choices Document – Dudley MBC response

### STRATEGIC CENTRES – SECTION 3A

1. *Instead of people having to travel outside the Black Country for shopping and leisure, as at present, do you think that more shopping and leisure should be located within the Black Country to meet its current and future needs?*

**DMBC Comment – Yes. It is essential that the Black Country meets its own needs in terms of its shopping and leisure expenditure.**

2. *Do you agree that future major shopping areas and leisure facilities in the Black Country should primarily be focused in four strategic centres, one in each Borough?*

**DMBC Comment – Yes. These areas should be the focus of the activities which attract large amounts of people. There should however, be development in the other local centres and district centres which appropriate to their scale, in order to survive and meet the needs of the centre.**

*If no, what other approach would you suggest?*

**DMBC Comment - Dudley Council considers that there should be proper and appropriate development in the local town and district centres of a scale appropriate to their role and function.**

3. *At present, each Borough in the Black Country has a Strategic Centre (ie. Dudley Town Centre, Wolverhampton City Centre, Walsall town Centre and West Bromwich town centre). Evidence shows that Dudley town centre is not currently performing as a Strategic Centre and is unlikely to be able to fulfil its role as a Strategic Centre in the future. However, Brierley Hill/Merry Hill offers a major opportunity to attract new investment to the Black Country and meet the needs of its population. Therefore do you agree that Brierley Hill should take over the role of Dudley as a strategic centre?*

**DMBC Comment - Yes. Brierley Hill acts as a strategic centre and should be afforded that status to unlock potential for regeneration. The centre has the capacity to expand. Detailed work has demonstrated that the centre can fulfil the requirements of the objectives of the Regional Spatial Strategy and can meet the vision set out in Planning Policy Statement 6 (Planning for Town Centres). The scale of retail growth in the Borough (and indeed the Black Country) necessitates large scale retail growth. The Brierley Hill centre can accommodate this growth, whereas the other centres are not able to fulfil that role from a capacity perspective or from a market perspective. Brierley Hill has the potential for the retail led regeneration to create wider opportunities to meet the needs of the wider Brierley Hill area and indeed benefit the wider Borough. An example of this would be the Metro extension to Brierley Hill, this will benefit a wider area, not just the Brierley Hill area.**

4. *If you answered yes to the previous question, do you agree that Dudley town centre could be developed as a regionally significant tourist centre in the future, complemented by its residential and cultural role?*

**DMBC Comment - Yes. Dudley town centre also has a significant civic centre focus, and has the potential to create an attractive residential environment capitalised by the quality historic and architectural assets of the Town Centre.**

The Council have also an adopted SPG which sets out how the Council's vision for the Town as set out in the UDP (2011) can be realised. This focuses strongly on the residential opportunity areas within the town centre, but also focuses on maintaining the centre as a strong centre meeting retail and leisure needs of the community it serves.

*5. Do you agree that shopping and leisure growth should be shared broadly equally between the four strategic centres, whilst still allowing some growth to take place in local town and district centres?*

**DMBC Comment - Yes. It is essential that there is an appropriate level and scale of growth in local town and district centres to contribute to sustainability and meet the needs of the community that the centre serves.**

*6. Do you agree that most culture, health and learning facilities should be focused in and around centres, in particular the four strategic centres?*

**DMBC Comment - Yes. Dudley Council considers that major facilities should be focused in the strategic centres. However, it should be recognised that local, town and smaller centres must have facilities to meet the needs of their communities and to reduce the need to travel. For example, Dudley Town Centre is a focus for cultural activities with considerable potential to expand their role for economic regeneration.**

### **OFFICES – SECTION 3B**

*7. Do you agree that the Black Country should maximise the future potential growth in office jobs within the Black Country rather than rely more on locations outside the area?*

**DMBC Comment - Yes. This is essential to deliver a sustainable and balanced Black Country which does not rely on other areas for its employment opportunities. If the Black Country relies on other areas outside the sub region for its offices this will lead to unsustainable travel patterns and will lead to the Black Country missing out on opportunities to create high quality jobs, and missing out on regeneration opportunities.**

*8. Do you agree that future offices based jobs should be:*

*a. Located mostly only in the four strategic centres (Wolverhampton, Walsall, West Bromwich and Brierley Hill)*

**DMBC Comment – Yes. This is important. Offices and retail and leisure should be located within these centres. This is important as these uses can create confidence in the centres and create opportunities for regeneration opportunities and comprehensive development strategies.**

Or

*b. Spread more between these four centres and other locations:*

*i Other smaller town and district centres?*

*ii Other public transport interchanges such as along corridors between strategic centres?*

*iii Located at motorway junctions and other existing concentrations of employment?*

**DMBC Comment - The vision for Dudley Town Centre seeks to ensure that it remains a focus for civil life. Although not operating as a strategic**



centre, it has a significant presence within the Black Country and is an entirely appropriate focus for office based jobs.

Please suggest examples of the types of locations you would prefer:

**DMBC Comment - Dudley Council considers that the significant growth should be focused in the centres, recognising that smaller scale office development can and should be accommodated in the local towns and smaller centres.**

9. Do you think that in balancing the share of future office jobs between the four strategic centres, more should be targeted on:

a. Wolverhampton as the city in the Black Country **DMBC Comment- NO**  
or

b. Wolverhampton and Brierley Hill due to their existing office market  
**DMBC Comment - YES**

or

c. Evenly shared between Wolverhampton, Walsall, West Bromwich and Brierley Hill? **DMBC Comment- NO**

10. If future growth in offices, as well as shopping and leisure is to be focused in these four centres, do you accept that these centres will need to expand physically beyond their existing boundaries?

**DMBC Comment - It is recognised that in some cases on a long term basis this may well be necessary. However extensions need to be planned through Development Plan Documents produced by the four Black Country Authorities and should meet the requirements of Planning Policy Statement 6 (Town Centres) and should meet the objectives of the RSS.**

11. To allow strategic centres to play a major role in the future of the Black Country, it will be crucial to maintain and improve their accessibility (See 3A, strategic centres and 3B, offices)

For each of the following centres, what method of transport should be focused on to achieve this? Please tick one for each centre:

	Wolverhampton	Walsall	West Bromwich	Brierley Hill
Bus Services	✓	✓	✓	✓
Metro	✓		✓	✓
Rail Services	✓	✓		
Roads	✓			✓

**DMBC Comment - This is not an exclusive list and further measures to improve accessibility ought to be considered over the period of time and should be phased through development and implementation frameworks.**

In each case, please give any examples where improvements might be made.

**DMBC Comment - It is essential that hubs and networks are developed across the Black Country to ensure that the centres are fully networked to areas within the sub region, but are also well connected to areas outside the Black Country and the Region.**

## **EMPLOYMENT LAND – SECTION 3C**

12. *Instead of people having to travel outside the Black Country for employment, as at present, do you think that more employment should be located within the Black Country?*

**DMBC Comment – Yes. This is essential so that the Black Country can strive to be a balanced community where residents do not have to travel long distances to find employment opportunities close to where they live. The accessibility to employment sites is a key issue and will be an important factor in the creation of a sustainable Black Country.**

13. *In order to provide quality locations for future employment land (including manufacturing and logistical uses), do you think we should:*

- a) *Retain and improve sites in locations with easy access (5-10 minutes travel time) to the motorway network, eg along the Black Country route and close to motorway junctions? **DMBC Comment - Yes***
- b) *Create/enhance new locations in the Black Country with easy access (5-10 minutes travel time) to motorway junctions through redevelopment/land assembly? **DMBC Comment - Yes.***
- c) *Create opportunities for wider spread of investment by building new roads within the Black Country to improve access from poorly located existing sites/new sites to the motorway network (M5, M6, M54 and M6 Toll)? Please refer to section 3E, environment, and section F, transport) **DMBC Comment - Yes***
- d) *Identify major new sites on the edge of the urban area, close to motorway junctions? **DMBC Comment - This would only be as a last resort when a full sequential appraisal of inner urban area sites has been considered.***
- e) *Promote sites at locations that can be served by rail as well as by road? **DMBC Comment - Yes***
- f) *Create/enhance sites served by public transport to enable people to access jobs? **DMBC Comment - Yes***

*Please give examples under a-f.*

14. *Do you think that the developments associated with High Technology Corridors could be drawn into the wider Black Country area to help deliver its future economic needs? **DMBC Comment – Yes, This is a very good idea. This could be via association with the Higher Education establishments within the Black Country, and by the promotion of new HE establishments within the Black Country. It should be remembered that regionally the corridors are as much about functional inter-relationships as spatial corridors and this must be transferred to the sub regional dimension.***

*Please give examples of how this might be achieved*

15. *Do you think a specific location or locations should be identified where specialist research and associated business development should be promoted? **DMBC Comment - Yes***

*Please give examples of the types of potential locations you would prefer.*

**DMBC Comment - Dudley Borough would welcome the promotion of specialist research and associated business development.**

*16. If new quality employment sites are to be created, do you agree that existing, poorly located sites should be redeveloped for other uses – e.g., housing, open space or other uses?*

**DMBC Comment - In some cases this is recognised that this will be essential. However, this must be properly managed and phased. It must not be seen as a blanket approach to the redevelopment of sites and should be carefully considered at Borough Planning Authority level.**

*Please give examples of the types of potential locations you would prefer.*

*17. Given the potential for the future development of logistics in the Region, should a location be identified for a Regional Logistics Site in the North Black Country/South Staffordshire area?*

**DMBC Comment - A site has been identified in the West Midlands Regional Logistics Study which was carried out by consultants Regeneris, Savills and MDS Transmodal in this broad location in preparation for phase 2 of the RSS review. In principle this can be supported. However, whilst this site would be acting as a Regional site, it will be essential that there are adequate transport infrastructural improvements to ensure accessibility from the western side of the Black Country to this location.**

*Please give examples of the types of locations you would prefer.*

*18. In order to serve the needs of specific sectors of the future Black Country economy, to provide **quality employment land**, should some employment land locations be 'reserved' for:*

- a. Manufacturing*
- b. Research and development*
- c. Logistics*

**DMBC Comment - Yes - This is essential to ensure that high quality sites are retained for high quality uses.**

*Please give examples of types of potential locations*

*19. In order to accommodate its housing growth, offices and quality manufacturing land, the Black Country would need to locate some logistics outside the area. Do you have any views on this?*

**DMBC Comment - It is important that logistics sites are located close to the motorway network and in areas of less congestion which may mean locating such facilities outside the area. However, as mentioned above, it is essential that such logistics sites are also highly accessible to all parts of the Black Country to ensure the swift transportation of goods throughout the sub-region. The issue of rail access should not be overlooked as this could be an integral part of the spatial strategy. One large single site near to the motorway is not**

necessarily the most sustainable answer and other opportunities which create access to all must be considered.

### **HOUSING – SECTION 3D**

20. *In order for the black country to meet its future housing needs and achieve a wider variety of house type and population mix, should we give priority to:*

- a) Housing growth within or very close (e.g., walking/cycling distance) to town centres, in particular the four strategic centres?

**DMBC Comment - Yes**

- b) Housing growth within walking/cycling distance to existing and currently planned public transport network e.g., Midland Metro, bus?

**DMBC Comment - Yes**

- c) Higher density housing around locations served by good public transport?

**DMBC Comment - Yes**

- d) Housing growth close to canal corridors?

**DMBC Comment - Yes**

- e) Intensification of development in existing housing areas throughout the Black Country including in the suburbs?

**DMBC Comment - Whilst this is acceptable in principle there is a danger of compromising other objectives within the BCS Vision. A balance needs to be achieved between housing growth and protecting/creating an attractive place to live and work. There is a danger that intensification could destroy the character that makes certain areas popular. In order to achieve real variety and choice in the housing stock, some locally distinctive areas will need to be protected from intensification.**

- f) Transformation of former Council estates?

**DMBC Comment – Yes. This is strongly supported.**

- g) Transformation of older terraced housing?

**DMBC Comment - This is dependant on the area and circumstances. Older terraced housing can in many places create a distinctive and attractive street scene. The focus here should be on transforming poor quality housing and living environments rather than focussing on any particular tenure or type of housing.**

- h) Use of surplus employment land areas?

**DMBC Comment - It is important, from an employment and wealth generation point of view that the Borough can provide employment land in the right place to maintain a competitive economic base. In principle it is accepted that any surplus employment land can be made available for residential purposes provided that the sites are demonstrably not required for industry and that they are sustainable, accessible and generally meet the other policy requirements for being a suitable residential site. The proper management of change in these areas is crucial.**

- i) Other? (please give examples)

-

Which three examples would you most like to see implemented?

**DMBC Comment - Housing growth within or close to town centres; housing growth within walking distance to the public transport network; and higher density housing around locations served by good public transport.**

21. *In order to attract people to live in the Black Country, should we encourage a mix of housing types and densities?*

*Please choose one of these options.*

- a) *At every neighbourhood level?*
- b) *Within each town?*
- c) *Within each Borough?*
- d) *Across the Black Country as a whole?*

*Please also refer to the questions in the Capacity section (3G)*

**DMBC Comment - Ideally, a mixture of house types and densities should be provided at a localised level to allow for all sectors of the community to exercise their lifestyle choices. However, in some circumstances, an area at neighbourhood level may have a very distinctive character that is desirable to preserve. A balance must be struck between creating mixed and inclusive communities with choice in the housing market whilst also encouraging, and where necessary protecting, local distinctiveness.**

### **ENVIRONMENT – SECTION 3E**

22. *In order to create quality living, business and leisure environments, should we prioritise investment in the landscape and built environment:*

- a) *In and around our centres, in particular, the four centres of Wolverhampton, Walsall, West Bromwich and Brierley Hill (including Merry Hill and the Waterfront)?*  
**DMBC Comment - Yes**
- b) *Along existing corridors – e.g., canals/transport?*  
**DMBC Comment - Yes**
- c) *Improvements in residential areas*  
**DMBC Comment - Yes**
- d) *Creation of new corridors- e.g., river valleys not currently enjoyed or walking/cycling routes between centres?*  
**DMBC Comment - Yes- However this also requires environmental and accessibility improvements to existing corridors.**
- e) *Other locations? e.g., making more of existing historic and heritage assets/hill tops and valleys/open spaces and biodiversity areas/around water features?*  
**DMBC Comment Yes**
- f) *Creation of space for wildlife*

**DMBC Comment -Yes. However, Dudley Borough is rich in quantity of spaces rich in wildlife. It is considered that the strategy should focus on improving existing sites for wildlife and addressing issues of poor quality and public accessibility. Our strategy should be based on good and improved management of the potential which already exists as well as the creation of new high quality areas.**

**It is however important that wildlife opportunities are catered for in new development. This is an important issue which needs to be reconciled with creating high density housing in the urban areas. The Black Country Study needs to pay careful attention to this to meet its dual objectives of creating higher density and to create a better quality environment.**

*g) Creation of new large scale accessible sites to serve the Black Country and/or to attract regional or national events based around e.g., new water feature/sports venue/ festival/environmental attraction*

**DMBC Comment-Yes. There is potential for facilities to be based upon the existing natural and historic heritage attractions and features.**

*Which of the three examples should have priority?*

*Please feel free to give examples of the types of locations you would prefer*

**DMBC Comment - It is considered that Wrens Nest and Castle Hill present a unique opportunity for exploiting the natural and industrial heritage assets of the Black Country. It is also considered that environmental enhancement should be focused on the existing developments along the canal network but also in creating high quality environment along the canal corridors. It is also considered that a strategic approach to river valley development is essential to create a comprehensive approach. (e.g, along the Stour Valley).**

*23. Could policies relating to centres, employment land, housing and transport contribute to the Black Country's environmental improvements/objectives?*

**DMBC Comment -Yes. This could be achieved if they include a focus on high quality environment. Similarly, environmental objectives need to carefully balanced against the needs of infrastructure and development needs for the Black Country to allow the Black Country to meet its dual aims of development and environmental and social improvements.**

*(Please also refer to Section F Transport and other relevant theme sections)*

*Please give examples*

*24. Should the Black Country have specific Black Country policies relating to sustainable development to deliver sustainability, (in addition to the RSS Policies), which set higher than national environmental targets e.g., for sustainable design, waste management, water and air quality?*

**DMBC Comment- Yes. These should be focused on what is specifically appropriate to the Black Country and the needs of the urban area.**

*If Yes, please identify policy areas that you feel would best promote sustainable development.*

25. Do you agree that to make green space more accessible to communities, some existing open areas could be developed for other uses in exchange for creation of new green spaces e.g., from former industrial land?

**DMBC Comment – Yes. However this must be done on a case by case basis. The focus should be on improving the quality of areas and providing opportunity in areas of deprivation of open spaces. In all cases where loss of open space is anticipated, any approach must be considered against the nature conservation landscape, recreation and amenity value of areas.**

*(Decisions will be taken in the light of open space audits and assessment work)*

### **TRANSPORT – SECTION 3F**

26. In order to create an effective transport network for the Black Country, a transport strategy will be needed that includes some of the following elements for **people** to move around

*Please rate your preferences (as many as you like) and give reasons why you feel these are preferred: 1=Most Important 5=Not Important*

<b><i>Travelling within the Black Country</i></b>	<b><i>Rank (1 – 5)</i></b>
<i>Improvements to aid walking</i>	3
<i>Improvements to aid cycling</i>	4
<i>Improvements to bus services</i>	3
<i>Extending the Metro beyond its existing proposals</i>	1
<i>Improved rail services</i>	3
<i>New or improved roads</i>	2
<i>Demand management</i>	2
<i>Park and Ride services</i>	4

**DMBC Comment – The movement of people will increasingly depend on good public transport, however, the roads and their management will continue to have a mayor role to play. Accessibility to the western side of the Black Country is a key issue which needs to be addressed by the Black Country Study.**

<b><i>Travelling within the Metropolitan conurbation</i></b>	<b><i>Rank</i></b>
<i>Improved bus services</i>	2
<i>Extending the Metro beyond its existing proposals</i>	1
<i>New or improved roads</i>	3
<i>Improved rail services</i>	2
<i>Park and Ride services</i>	3
<i>Demand management</i>	2

**DMBC Comment – As above but with even greater role for Public Transport augmented by better Park and Ride facilities.**

<b><i>Links to/from the West Midlands conurbation</i></b>	<b><i>Rank</i></b>
<i>Improved links to the rail network</i>	2
<i>Improved bus and coach services</i>	4
<i>New and/or improved roads</i>	1

<i>New and/or improved links to Birmingham International Airport</i>	3

**DMBC Comment – Highways will continue to be the most important inter-conurbation mode of transport.**

*27. In order to create an effective transport network to support the Black Country Vision, a transport strategy will be needed that includes some of the following elements for **goods** to move around.*

*Please rate your preference (as many as you like) and give reasons for your preferences:*

	<i>Rank (1 – 5)</i>
<i>Improved local road links to aid distribution</i>	1
<i>Improved access to town centres for deliveries</i>	1
<i>Improved links to the motorway network</i>	1
<i>Improved rail services (including improved access)</i>	3

**DMBC Comment – Economic Regeneration and the Economic vitality of the Borough is dependant on good highway access to goods, services and employment.**

*28. Should policies be developed that prioritise the movement of freight by road in the same way as buses, cyclists and taxis?*

**DMBC Comment- Yes**

*Please also refer to questions relating to transport in Sections 3B Offices, 3C Employment Land, 3D Housing.*

### **CAPACITY – SECTION 3G**

*29. Studies have shown there is not enough land to accommodate all of the needs for the Black Country’s population growth, housing, office and employment land. Should the Black Country prioritise population growth and housing needs over office and employment land needs, even if this means that some jobs may need to be located outside the Black Country?*

**DMBC Comment -For the Black Country to thrive and meet the objectives of the Vision it needs to attract and retain population. This will only be achieved if the Black Country can provide a sustainable solution with suitable housing and employment as well as associated retail facilities, services including education and healthcare, and an attractive environment. An appropriate balance needs to be struck between each of these factors.**

**In respect of this, phasing of growth will need consideration to ensure that appropriate numbers of homes are provided in the right place and at the right time, reflecting changes and growth in centres, employment and local services. Management of areas of potential change is critical to the success of the strategy.**

*30. Or, should we seek to achieve a balance between providing housing growth and employment land even if this means we cannot accommodate all of our housing needs?*



**DMBC Comment - In addition, Dudley MBC considers house building targets to accommodate 71,000 more households by 2031 are ambitious but are achievable. However, the Black Country Urban Housing Capacity Study results suggest a reliance on intensification to meet the vision which may not be desirable to the extent envisaged. Also, the capacity study assumes that a 1:1 replacement ratio is achievable. This assumption has not yet been fully tested. The Regional Urban Capacity Study prepared for Phase Two of the RSS Review records a replacement rate of 73.33% in the Black Country between 2004-2011, 72.4% 2011-2021 and 83.24% 2021-2026 with an overall replacement rate of 75.89%. A failure to achieve the 1:1 replacement rate would reduce the capacity figures given in the Study and compromise the ability of the Black Country to meet the Vision. A robust strategy is required to deliver the objectives of the vision, which can ensure that the vision is met in appropriate manner. We need to accept fully the realities which are recorded in the Urban Capacity Study and to see this as a driver for the scale of urban regeneration which is required.**

**See also response to Q29 above**

*31. Alternatively, if there was a need for more dwellings to be provided to meet the needs of the Black Country population, should we perhaps consider building at higher densities?*

**DMBC Comment - Higher average densities are achievable and desirable in certain areas within the Black Country. However, it would need to be clear on where higher densities are, and are not, expected. This would need to be done within the context of on overall Black Country Strategy.**

