

**Amey**

# Technical Note

**Dudley Metropolitan Borough Council TRO Process  
Review**

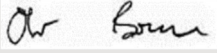


**COMHA1DMB0 / 01**

**20/09/2023**



# Document Control Sheet

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<b>REPORT NUMBER:</b>	01
<b>PROJECT NAME:</b>	Dudley Metropolitan Borough Council TRO Process Review
<b>PROJECT NUMBER:</b>	COMHA1DMB0

STATUS/AMENDMENT	PREPARED	REVIEWED	APPROVED
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## Executive Summary

Dudley Metropolitan Borough Council have commissioned Amey to review and suggest improvements to the existing policy for dealing with requests for minor schemes involving Traffic Regulation Orders (TROs).

The current process is to score and rank all incoming requests before undertaking an annual review. After the review the top 30 requests in the scoring system are progressed.

The process does not provide good service to the residents of the borough as it can take over a year from a TRO request being made before a scheme is implemented. Implementing 30 TROs at the same time also puts a strain on Dudley Metropolitan Borough Council staff.

A new scoring system is proposed linking more closely with Dudley Metropolitan Borough Council objectives. It is also proposed that scoring takes place three times a year to reduce the waiting time following making a TRO request. These three reviews would take place in June, September & December and have been set to avoid the period around local elections.

Increasing the number of review periods from one a year to three will increase the cost of advertising TROs for the council. Orders must be advertised in a local newspaper, and this is currently done as one large advert annually. Three smaller adverts will individually cost less than one large advert, but combined, the cost will exceed that of a single large advert.

This process would spread the workload of implementing TROs across the year rather than all at once, reducing pressure on staff. The new process would also improve the service provided for introducing Disabled Residents Parking Places and TROs associated with new developments and planning requirements as these are also included within the annual TRO advert.

It was also requested that Amey consider the site noticing which is required for any TRO as part of the regulatory process the council must follow. Complaints are regularly received, stating that the existing notices were not seen or were difficult to interpret.

Streamlined notices are proposed which include less detail but contain a QR code linking to a Dudley Metropolitan Borough Council web page listing all active TRO consultations. This will allow for more information and plans to be distributed to residents and business owners without the need for costly letter drops. The new notices would also be easier to prepare for members of the Dudley Metropolitan Borough Council Traffic team with less site-specific information required on each notice.

It is recommended that Dudley Metropolitan Borough Council adopts the new TRO policy despite the potential increased costs associated with advertising. It is considered that the reduced waiting period will provide a better level of service to residents whilst also reducing pressure on staff members.

It is also recommended that Dudley Metropolitan Borough Council I adopts the new site noticing template as laid out in this report to provide better information to residents.

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# 1. Introduction

## 1.1. Brief

- 1.1.1 Amey have been asked by Dudley Metropolitan Borough Council's Traffic & Road Safety Team to review the existing process which they follow to score and select minor schemes which require Traffic Regulation Orders (TROs).
- 1.1.2 The purpose of the review is to provide a better service to residents and businesses in the borough by providing responses more quickly, whilst also being a transparent process.
- 1.1.3 Whilst also considering changes to the TRO process, Amey have been also asked to consider how site noticing associated with TRO adverts could be improved following complaints.

## 1.2. Background

- 1.2.1 The existing process for dealing with requests for TROs (such as localised waiting restrictions (typically double yellow lines), loading restrictions, the provision of loading bays, one-way streets etc) is undertaken on an annual basis so residents could be waiting over 12 months before receiving feedback on if requests have been successful or rejected.
- 1.2.2 In some cases, this could lead to potentially unsafe practices / conditions on the highway remaining an issue for up to two years (when the time to implement the TRO once it has been selected to be taken forward is considered).

## 1.3. What is a TRO?

- 1.3.1 A Traffic Regulation Order (TRO) is the legal tool used by Highway Authorities to control vehicular movement and waiting along and on the highway.
- 1.3.2 The Road Traffic Regulation Act 1984 lists the reasons for which a TRO can be introduced. These include:
  - ⑩ To prohibit traffic or certain classifications of vehicles from proceeding along a road or section of road
  - ⑩ To restrict or prohibit waiting and loading
  - ⑩ To prohibit or make certain movements compulsory
  - ⑩ to set a speed limit or direction of travel on a road or part of road
- 1.3.3 There are two types of TRO, Stationary Vehicle Offences (SVO) and Moving Vehicle Offences (MVO).
- 1.3.4 SVOs relate to prohibitions or restrictions on kerbside activity such as waiting restrictions, loading restrictions or the provision of restricted use bays such as loading bays, disabled parking bays or limited waiting bays.
- 1.3.5 MVOs relate to prohibitions and restrictions of movement for all or certain types of vehicles, such as a prohibition of entry at a junction, a one-way road or a weight limit on a bridge.
- 1.3.6 The highway is intended to maintain traffic flow and no right of parking exists on the highway. The only rights you have on a highway are to pass and repass. Parking provision is therefore a concession and, however desirable, should not be at the expense of traffic flow. Parking restrictions aim to resolve specific local issues.

## 2. TRO Process Review

### 2.1. Current Process

- 2.1.1 Requests for minor TROs are received throughout the year and addressed together annually in October. Requests are scored against criteria using the scoring sheet which can be found in Appendix A to this report.
- 2.1.2 Examples of minor TRO requests include short lengths of double yellow lines, (No Waiting At Any Time Restrictions), parking bays, no entry signage, or one-way streets.
- 2.1.3 The scoring sheet includes factors including:
- ⑩ Road type,
  - ⑩ carriageway width,
  - ⑩ If the request is for works on a bus or winter gritting route,
  - ⑩ The nature of properties impacted by the proposal,
  - ⑩ The level of support for the request
- 2.1.4 The score sheet is completed by a member of the Traffic & Road Safety team and the score is inputted into a spreadsheet where the requests for the year are stored and ranked by score.
- 2.1.5 Generally, the top scoring 30 requests are taken forward for advertisement and implementation. In practice this figure varies year by year as many requests may achieve the same score which can then result in a requirement to implement fewer than 30 schemes e.g., if the a score of 28 is taken as a cut off one year, this may result in 26 requests which are to be implemented, but to lower the cut off to 27 would add an additional 10 requests which all scored 27, thereby requiring more requests to be implemented than there is capacity for the Dudley Metropolitan Borough Council Traffic team to handle.
- 2.1.6 The successful schemes are then progressed with design drawings prepared and necessary consultation undertaken.
- 2.1.7 A single TRO advert is then prepared which encompasses all of the successful requests but also disabled bay applications and any orders associated with new developments in line with planning approvals.

### 2.2. Issues with the Current Process

- 2.2.1 The benefit of the current process is that only one TRO Advert is placed in the Express and Star local newspaper which keeps costs to a minimum, the process does cause some issues.
- 2.2.2 As covered in sections 1.2.1 & 1.2.2 to this report, the main issue relating to the current process is that residents can wait over 12 months to find out if a request will be progressed. This does not represent a good service to residents
- 2.2.3 The current process also puts strain on council staff with numerous requests needing to be processed at the same time once selected and approved.
- 2.2.4 Council staff also have to deal with more enquiries with frustrated residents getting in contact for updates on requests during the long waiting period.
- 2.2.5 The existing scoring system has also been criticised for not putting sufficient weight on the safety and other related highway factors such as the proximity to major traffic generators, being on a bus route, Air Quality Corridor or gritting route.

## 2.3. Proposed Changes

### TRO Process

- 2.3.1 It is recommended that instead of collating all TRO requests over a year long period and undertaking a single programme of implementation, requests be logged and reviewed on three occasions throughout the year.
- 2.3.2 Initially a quarterly review was considered, however it was deemed that dealing with TRO requests around the time of elections would be problematic due to purdah.
- 2.3.3 Instead, requests would be reviewed in June, September and December, with the 10\* highest scoring requests selected to be progressed.
- \* NB 10 requests could be subject to change depending on scoring issues (as covered in 2.1.4)
- 2.3.4 This new process would then see three smaller TRO adverts placed through a year rather than the existing one.
- 2.3.5 It is anticipated that the cost of these three smaller adverts will exceed the price of one large newspaper advert. However, there is potential to offset these advertising costs by combining TRO adverts with other schemes which are implemented by Dudley Metropolitan Borough Council and require legal orders which are advertised throughout the year.
- 2.3.6 The benefits of the proposed approach would be as follows:
- ⑩ TRO requests will be dealt with and implemented more quickly representing a better service to the residents and businesses of the borough.
  - ⑩ Other TROs such as disabled residents parking places and those associated with developments would also be undertaken more frequently, as they are currently bundled with the annual TRO advert.
  - ⑩ The process would also reduce pressure on Dudley Metropolitan Borough Council staff as they would introduce the TRO requests over the course of a year rather than all together.
  - ⑩ It is anticipated that the more frequent TRO scoring would reduce the number of residential queries which staff have to respond to.
- 2.3.7 A process map detailing the proposed new TRO Request Policy can be found in Appendix B to this report.

### TRO Scoring

- 2.3.8 A new scoring system for the TRO requests has also been developed to incorporate more factors including:
- ⑩ air quality
  - ⑩ the collision history
  - ⑩ The nature of the road in question (e.g. Primary route or local estate road etc)
  - ⑩ The impact of the reported problem (e.g. along a route, on one side of a carriageway etc)
  - ⑩ The duration / frequency of the reported issue (e.g. every day, working days, short durations)
  - ⑩ Proximity to a high-volume traffic generator such as a school or hospital
- 2.3.9 This better aligns with the Dudley Metropolitan Borough Council's priority of promoting sustainable travel choices and the wider West Midlands Local Transport Plan objectives of creating accessible places, encouraging walking, wheeling & cycling, promoting public transport and creating a safe, reliable highway network.

2.3.10

- 2.3.11 Scoring criteria have been set to be purely factual so the process can be truly transparent with no scope for scoring to be considered subjective.
- 2.3.12 Some requests are made which are not considered to be feasible. Instead of these going through the full scoring process and being considered in one of the three reviews each year, there are six initial gateway questions associated with the new scoring system. When each request is received it will be logged onto the system and the prequalifying questions will be completed at that time. Any request not meeting the criteria set out in these questions will be rejected and not taken any further. At this stage, the requestor will be notified that the request will not proceed.
- 2.3.13 The prequalifying questions are associated with:
- ⑩ The nature of the request (neighbourly disputes will not be prioritised)
  - ⑩ The carriageway width in the location of the request, (if the street is too narrow for what is requested, a request will not be considered)
  - ⑩ If there is a planned scheme in the area which the request could be incorporated into
  - ⑩ If surveys would be required to be undertaken (if so, the request will be considered separately)
  - ⑩ For requests for one-way streets, prohibitions of entry and access restrictions, if there is an alternative route for impacted traffic (if not, the request will not be considered further)
  - ⑩ Once a request has been rejected on the grounds of not meeting prequalifying questions it will not be considered again, unless there have been changes which would mean the request would meet the prequalification.
- 2.3.14 A list of requests which are selected in each review will be shared on the Dudley Council website.
- 2.3.15 A copy of the new scoring system for TRO requests can be found in Appendix C to this report.

## 3. Site Noticing

### 3.1. Requirement for Site Noticing

- 3.1.1 The process for making a permanent TRO is subject to national legislation in the form of The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. These regulations identify a series of steps that must be taken before making an order.
- 3.1.2 These steps include consultation with stakeholders, impacted frontages, the emergency services, the highway authority, bus companies, road haulage association etc, publishing of a notice of the proposed TROs in a local newspaper, a 21-day objection period and a process to consider and resolve objections. A final notice is also published in a local newspaper once an Order is approved and officially sealed.
- 3.1.3 Once an Order is sealed it can be introduced onsite and then enforced.
- 3.1.4 As part of the Local Authorities' Traffic Orders (Procedure) (England & Wales) Regulations 1996 authorities are required to "take such ... steps as it may consider appropriate for ensuring that adequate publicity about the order is given to persons likely to be affected by its provisions."
- 3.1.5 The procedure also lists some measures which may be considered to be appropriate which are:
- ⑩ Publication in the London Gazette and or local newspaper
  - ⑩ displaying notices in roads affected by the order or the delivery of notices,
  - ⑩ letters to impacted properties.
- 3.1.6 As that the procedure does not specifically state what must be done as a minimum, different Local Authorities approach the publication of TROs in different ways.
- 3.1.7 The current practice is to erect site notices specific to each individual site impacted by an order but do not issue letters to impacted properties in the vicinity of the works.



- 3.1.8 Some authorities do not erect any notices at all but post letters to impacted frontages to give details of proposals and how to object, along with putting information on TRO adverts on council websites and or social media.
- 3.1.9 Other authorities choose to letter drop and erect notices, and post information online.

## 3.2. Issues With Site Noticing

- 3.2.1 Complaints are commonly received during TRO objection periods or when a scheme is introduced that residents didn't see the site notices or that the notices are difficult to read or understand.
- 3.2.2 An example site notice is enclosed within Appendix D to this note.
- 3.2.3 The current site notices include details of the proposed TRO along website links to further information to support the site notice such as plans and a statement of reasons. The long-winded nature of web addresses makes it difficult for residents to follow, particularly in poor weather conditions.

## 3.3. Proposed Changes to Site Noticing

- 3.3.1 When making changes to local procedures relating to TROs, consideration is commonly given to the processes which have been followed previously and as such, what residents have become accustomed to.
- 3.3.2 Given that Dudley Metropolitan Borough Council already follows a process of erecting a site notice it could be considered prudent to continue to erect a notice of sorts but in light of the criticism relating to how difficult the current notices are to read and understand, it is recommended that some changes to the nature of site notices are implemented.
- 3.3.3 A new format of site notice could be created that would be more eye-catching, easier to read and less onerous to prepare.
- 3.3.4 These would be designed to be more visible to residents in an attempt to reduce the number complaining that they did not see notices posted on street and could incorporate a QR code which would link to the council website where a page for ongoing consultations would contain a list of schemes, and then the resident would select the relevant site and find plans and supporting information as required. This would allow one QR code to be used on all site notices, making the notices quicker to create. The only site-specific information needed on the notice would be the scheme title and objection period closing date.
- 3.3.5 To accommodate those residents with no access to the internet, a phone number to discuss the proposals would be included.
- 3.3.6 A mock-up of how a new format site notice could look can be found in Appendix E to this report.

## 4. Conclusion & Recommendations

- 4.1.1 The existing TRO policy requires residents of the borough to wait up to 12 months before finding out if a request is to be progressed with a further three months required to undertake necessary consultation and statutory advertisement. This does not represent a good level of service and also puts strain on council staff, requiring the delivery of up to 30 projects at the same time.
- 4.1.2 Introducing the proposed new policy would improve service by reducing the time residents would need to wait to find out if a TRO request has been successful to a maximum of 6 months. Unfeasible requests will also be discounted following an initial check and requestors notified at an early stage.
- 4.1.3 It is envisaged that the scoring system could be put online, allowing residents to complete much of the scoring at the time of making the request. Although the information provided by requestors would still need to be checked, it is anticipated that this would further reduce the burden for members of the Traffic & Road Safety team. For those residents who do not have access to the internet, the application process could be undertaken via the Dudley Metropolitan Borough Council Plus call centre staff.
- 4.1.4 This would also reduce the strain on council staff by spreading workload throughout the year.

- 4.1.5 It is therefore recommended that the new process is adopted immediately and implemented at the earliest opportunity.
- 4.1.6 The existing site notices erected to advertise proposed TRO changes in an area have long been a source of complaint for residents of the borough. The site notices are wordy, and residents find these difficult to follow.
- 4.1.7 It is recommended that a streamlined site notice format be introduced which would link to a website containing plans and supporting information on proposals along with a point of contact for both objections and to discuss the proposed restrictions.

## Appendix A: Current TRO Scoring Sheet



**TRAFFIC REGULATION ORDER SCORE SHEET**

Location..... Date Received.....

From..... (contact) Petition Yes / No

Summary of Request

.....

.....

Supporting information attached yes/no

Total score..... Scored by..... Initials.....

Applicant advised – date...../...../.....

**PHYSICAL**

CRITERIA	DEFINITION	ALLOCATION	SCORE
Road Type	Primary Route	8	
	Other Strategic	4	
	Estate	2	
	End of Route / Residential	1	
Width of Carriageway	<6.5m	3	
	6.5 to 9.0m	2	
	>9m	1	
Bus Route	Service Buses, winter gritting	5	

Sub Score =

**ENVIRONMENTAL**

CRITERIA	DEFINITION	ALLOCATION	SCORE
Poor Visibility, Obstructive parking	Route	8	
	Junctions	6	
	In several streets	4	
	Both sides of carriageway	2	
Duration of problem	One side of carriageway	1	
	For 24 hours	5	
	During daytime only	4	
	During peak hours only	3	
Affected Interests	During night time only	2	
	For short periods	0	
	Local Economy - Shops	4	
	Commerce - Offices	3	
	Heavy Industry – Industrial Estate	2	
	Residential properties	1	

Sub Score =

C:\Documents and Settings\Helen.Moore\Local Settings\Temporary Internet Files\OLK15\2013 TRO Ranking Score Sheet2.doc

<b>COMMUNITY</b>
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CRITERIA	DEFINITION	ALLOCATION	SCORE
Engagement	Petition	10	
	Emergency Services	8	
	Ward Councillor	6	
	Refuse Collection/Council Service	4	
	Multiple Public – more than 2 in street	2	
	Single requestor	0	
Vulnerable Road Users / Assistance for environmental travel	Pedestrians / Cyclists / Disabled Equestrian	0 (Zero) or 5	
Healthy Lifestyles	Will assist healthier forms of travel	2	

Sub Score =

<b>Total Score</b> (max = 51)	
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## Appendix B: Proposed TRO Policy Process Map

## **Dudley Metropolitan Borough Council Traffic Regulation Order Process Map**

When Traffic Regulation Order (TRO) requests are received, a standard email reply will be sent to outline the process for scoring TRO requests and give information on the next review date. For any responses received through the post, a reply letter will be sent to update the resident.

The TRO request will then be logged onto the scoring spreadsheet and given a unique reference number (the next line on the spreadsheet). The original email or letter (scanned) will then be saved with the unique reference in the title.

TRO requests are to be reviewed three times a year. These reviews will take place in June, September and December. These dates have been selected to avoid the election period.

TRO requests will be logged and will undergo an initial feasibility check in the form of prequalifying questions to ensure it meets the key criteria. If the request is not feasible, it will be discounted, and the requestor notified. If it is justified, it will be scored within the scoring spreadsheet and at the point of the review, the top 10 scoring requests will be selected to proceed. Should TRO requests achieve the same score then this may result in fewer than 10 requests progressing, or more depending on the scores i.e. should the 10<sup>th</sup>, 11<sup>th</sup>, 12<sup>th</sup> and 13<sup>th</sup> request all be tied, then only nine requests would be progressed to avoid needing to introduce 13 requests and the associated increased workload.

Should the 10<sup>th</sup> and 11<sup>th</sup> requests be tied, then 11 requests would be progressed.

Emails or letters will be sent to all requestors to notify of the decision to progress or not.

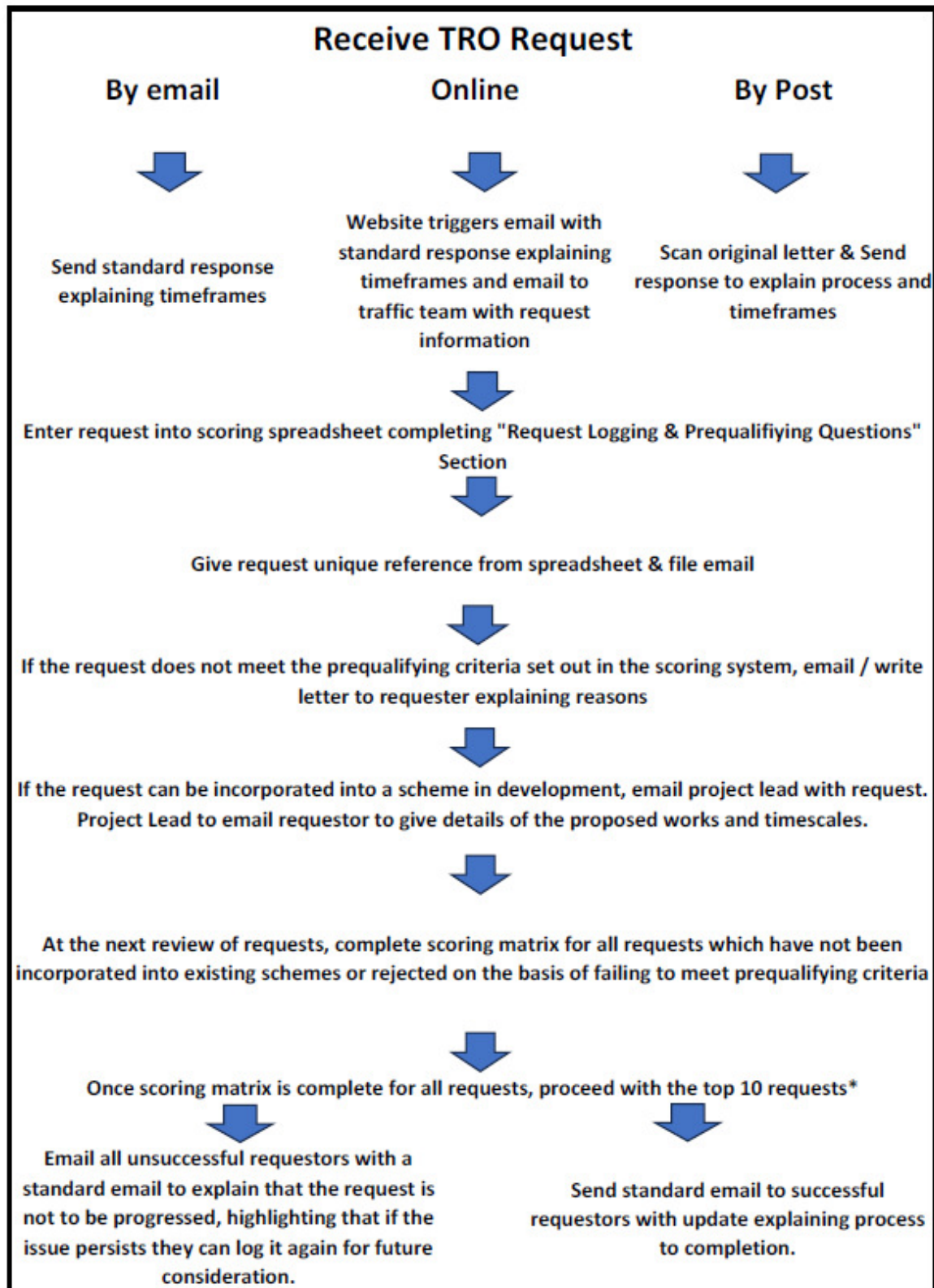
Under the former TRO request policy, requests were considered once annually with 30 being progressed. As a transition to the new process, there are some existing requests which have been made within the last 12 months. Under the new process, only 10 schemes would be introduced. The residents making requests which ranked in positions 11-30 would likely feel aggrieved at having waited up to year only to have their request rejected. To acknowledge this situation, it is proposed that those requests ranked in positions 11 to 30 in the first review under the new policy are transferred to the next review period and be reconsidered.

After these initial 20 requests are reconsidered during the 2<sup>nd</sup> TRO request review under the new policy, no further unsuccessful requests will be stored and kept under consideration for the next review period. Should requestors wish a request to be considered again, another request will be required.

If a repeat request is received, which was not justified beforehand. It will not be considered again unless there has been a change in the circumstances at the location.

Councillors and stakeholders will be consulted on the requests which are being progressed and a TRO advert prepared. This advert will include all of the successful TRO requests for that review period, along with any Disabled Residents Parking Places or TROs associated with new developments / planning requirements.

The statutory process for implementing a TRO requires a consultation with Stakeholders and Councillors, along with a four-week formal consultation stage required before any measures can be introduced. A typical programme for a TRO to be introduced is 3 months from the point a request is selected to proceed following scoring. This could be longer should objections be received from stakeholders, councillors or from members of the public.





## Appendix C: Proposed Scoring System

**Request Logging & Prequalifying Questions**

Reference number	Date of Request	Location	Ward	Requestor	Type	Request Type	What is the nature of the request (if Neighbourly dispute discount)	Could the scheme be included within a scheme which is already in development? If yes, forward to Project Lead and stop scoring	If request is for an MVO, will surveys need to be undertaken? If so, the request will be reviewed seperately	If request is for a one-way, prohibition of entry or access restriction, is there a suitable alternative route for those vehicles which will be prohibited by the request? IF NOT DO NOT PROCEED	Carriageway width	
											What is carriageway width?	Is width sufficient to accommodate requested measure? IF NO DO NOT PROCEED

Scoring

Type of route (Maximum score 10)	Impact of the issue (Maximum score 10)	Is the request supported by councillor(s) / MP(s)? (Maximum score 5)	Is there a high volume traffic generator within 100m of proposed site? (hospital, school, town centre, metro stop) (Maximum score 5)	What is the duration of the reported issue? (Maximum score 6)	Collision History Have there been collisions within 50m of the proposed works in the last 3 years? KSI Slight (Max. score 10) (Max. score 2)	Additional Considerations Is the request on an Air Quality Route, Bus Route or Gritting Route (Maximum score 10)	Total Score (Max. score 58, Low score 5)
-	-	-	-	-	-	-	#VALUE!
-	-	-	-	-	-	-	#VALUE!
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## Appendix D: Example Site Notice - Existing

**THE BOROUGH COUNCIL OF DUDLEY (2022/2023 TRO) (VARIOUS ROADS)**  
**(PROHIBITION AND RESTRICTION OF WAITING AND LOADING, NO STOPPING ON**  
**ENTRANCE MARKINGS, DISABLED PARKING PLACES AND PARKING PLACES)**  
**(NUMBERS 3,4,5,6 AND 7 ORDER TYPE) (STOURBRIDGE, HALESOWEN, CENTRAL**  
**DUDLEY, NORTH DUDLEY AND BRIERLEY HILL AREAS)**  
**ORDER 2022**

**NOTICE IS HEREBY GIVEN** that the Dudley Metropolitan Borough Council propose to make the above mentioned Order, the effect of which will be that certain lengths of the roads listed below will have new restrictions in place as stated:

**Scheme Reference P695/1**

<b>Restriction of Waiting Monday – Friday 3pm-4pm</b>	Whittingham Road, Halesowen
<b>Restriction of Waiting Monday – Friday 8am-9am</b>	Whittingham Road, Halesowen

A copy of the draft Order, maps and statement of reasons for proposing to make the Order may be examined at <https://www.dudley.gov.uk/residents/parking-and-roads/travel-and-transport/local-transport-policy/traffic-consultation/> and selecting 'Traffic Consultation database'.

**There are other roads within the Borough that are affected by this Order. All maps and statement of reasons relating to these roads can also be viewed by visiting the webpage above.**

Any letters of objection and all written comments with respect to the proposed Order should be emailed to [traffic.management@dudley.gov.uk](mailto:traffic.management@dudley.gov.uk) or addressed to Group Engineer - Traffic and Road Safety, Dudley MBC, 4 Ednam Road, Dudley, DY1 1HL, stating the grounds on which they are made and should be received by no later than 30<sup>TH</sup> September 2022.

Further information about the proposals can be obtained from [joanne.kirkham@dudley.gov.uk](mailto:joanne.kirkham@dudley.gov.uk) or [helen.wilkins@dudley.gov.uk](mailto:helen.wilkins@dudley.gov.uk)

Dated: 5<sup>th</sup> September 2022

## Appendix E: Example Site Notice – Proposed

**THE BOROUGH COUNCIL OF DUDLEY****STREET NAME****SCHEME REFERENCE: P695/1****NOTIFICATION OF CHANGES IN YOUR AREA**

**NOTICE IS HEREBY GIVEN** that the Dudley Metropolitan Borough Council propose to make changes to kerbside parking in your area. The objection period for this order closes on DATE.

For more information including an explanation of the proposed changes, maps and a statement of reasons can be found by following the QR code below. Alternatively, visit [www.dudley.gov.uk](http://www.dudley.gov.uk) and search for the above scheme reference.

Potential to add a simplified web address e.g. [www.dudley.gov.uk/traffic-consultation](http://www.dudley.gov.uk/traffic-consultation)



If you do not have access to the internet, please call **0300 555 2345** for more information on the proposals.

Further information about the proposals can be obtained from [joanne.kirkham@dudley.gov.uk](mailto:joanne.kirkham@dudley.gov.uk) or [helen.wilkins@dudley.gov.uk](mailto:helen.wilkins@dudley.gov.uk)

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