

**S/4/52(60)**

**STATEMENT**

**BY**

**SOUTH STAFFORDSHIRE DISTRICT COUNCIL**

**ALSO REPRESENTING**

**THE STAFFORDSHIRE AND STOKE-ON-TRENT PLANNING  
FORUM**

**TO  
THE WEST MIDLANDS RSS:  
DRAFT PHASE ONE REVISION –  
BLACK COUNTRY  
EXAMINATION-IN-PUBLIC**

**DECEMBER 2006**

The Staffordshire and Stoke-on-Trent Planning Forum is a non-executive and consultative sub-committee of the Staffordshire Local Government Association that meets regularly to discuss matters of mutual interest to the local planning authorities across Staffordshire and Stoke-on-Trent.

## **MATTER 4: Transport and accessibility**

(Proposed Policy UR1A (i) and (ii), revised Policy T12A, and supporting text)

*Proposed Policy UR1A clauses (i) and (ii) set out the basic policy context for transport and accessibility in relation to the Black Country. Additional proposals are identified in Revised Policy T12A (page 28), together with new supporting text that “will complement and as appropriate, reinforce the overall package of proposals in existing Policy T12”. Matter 4 will consider whether the Draft Phase One Revision provides sufficient and necessary guidance on the issues identified in relation to the Black Country. Issues that have been raised include whether more guidance is possible on investment priorities, the balance between roads and public transport, and between Metro extensions and other public transport investment.*

*Specific questions will include:*

*4.1 Does the Draft Phase One Revision provide sufficient and necessary guidance on:*

*a. Public transport services provision and improvements (including an integrated public transport system) and linking the four strategic centres;*

*b. The balance between modes;*

*c. The potential for increasing freight travel by rail and waterways;*

*d. The Regional context of improvements to the motorway network in the Black Country;*

*e. Reducing congestion and facilitating easy accessibility in relation to transport development proposals;*

*f. The role of walking and cycling as sustainable transport options?*

Matter 4.1 d.

### **1. Background**

1.1 South Staffordshire Council recognises that new roads can contribute to economic development and in addition improvements to the national road network can assist in improving accessibility, personal mobility and the movement of goods. South Staffordshire Council has never taken a dogmatic approach to new road proposals, rather it considers the wider benefits, together with the costs that inevitably result from major road building proposals and reaches the appropriate conclusions.

1.2 South Staffordshire Council fully supports the revision to Policy T12 (Priorities for Investment) and is in general support of the new supporting text set out in paragraphs 9.93 – 9.96.

1.3 South Staffordshire Council is acutely aware, however, that pressure does exist in the sub-region to support simplistic options that purport to be a panacea to the transport problems of the Black Country. It is the Council's view that not only is there no sound economic, environmental or social case for the provision of some form of “Western Bypasses/Orbital Route” but believes that the consideration of such proposals diverts attention from the real and significant problems of accessibility in the Black Country and the solutions included with the revision of Policy T12.

1.4 It is also respectfully submitted that consideration of proposals for a Western Bypass/Orbital Route is outside the terms of reference for the Black Country Study/Phase

One Revision and thus should not be progressed as a result of this Examination in Public.

## **2.0 Government Policy vis-à-vis Western Bypass (or equivalent)**

2.1 Government thinking on the Western Bypass debate has been hugely influenced by the West Midlands RPG Panel Report: October 2002 which notes:

8.5.32 *In our view the BCRIRS study, fails to prove regeneration benefits from the Western Bypasses. Rather, the Bypasses could result in attracting employment investment away from the urban conurbation into the adjacent Green Belt areas. Furthermore, we consider that the environmental harm which would result from the construction of the proposed roads would be significant. We therefore consider that the **need for the Western Bypasses to support draft RPG's spatial strategy is not demonstrated.***

The Panel went on to recommend that all reference to the Wolverhampton and Stourbridge Western Bypasses be deleted from the RPG as follows:

*"R8.12 Specific reference to the Wolverhampton and Stourbridge Western Bypasses should be deleted from Policy T16, and the indicative line shown on the amended T&A diagram, and on the Inset, should be deleted. Consequential changes should be made to other parts of the guidance, such as removing the reference the Western Bypasses from para 3.37."*

2.2 Subsequently the Secretary of State accepted the Panels recommendation and deleted all reference by the Bypasses in the final version of Regional Planning Guidance for the West Midlands published in June 2004.

2.3 Previously on the 9<sup>th</sup> July 2003 the then Secretary of State for Transport, Alistair Darling MP, made a Statement to the House of Commons concluding that:

*"40. On regeneration grounds, the West Midland study recommended dual carriageways around Stourbridge and Wolverhampton. But the justification was, as the local planning inquiry recognised, doubtful*

*41. These roads would cut through an area of remarkable unspoilt countryside. I believe we can find better ways of achieving regeneration of the West Midlands. Which is why I am rejecting the proposals and instead support the case for the Regional Assembly's study of regeneration in the Black Country."*

2.4 As noted above consideration of the Western Bypass is outside of the terms of reference for the Black Country Study/Phase One Review as set out at paragraph 1.32 of Regional Planning Guidance for the West Midlands as follows:

*"1.32 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 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. This Study should be completed by summer 2005 and feed into a subsequent review of this guidance."*

It is evident that the emphasis in terms of accessibility, concerns the eastern side of the Black Country and not the western fringe.

### **3.0 Transport Accessibility and Regeneration**

3.1 Transport improvements are not an end in themselves but better transport is an essential component of the Regional Spatial Strategy as set out at paragraph 9.1 of that document as follows:

- “9.1 a) Concentrating development and investment in the Major Urban Areas (MUAs) will require accessibility and mobility in these areas to be maintained and, in some areas, significantly enhanced;*
- b) Diversifying and modernising the Regional economy will require improved access for goods and services, particularly across national networks within and beyond the Region;*
- c) Urban and rural renaissance will only be successful if fully supported by appropriate transport policies, as highlighted in Chapters 4 and 5, where improved access must be a key component of an improved quality of life; and*
- d) Conserving and enhancing the environment will require land use decisions which reduce the need to travel, behavioural change initiatives to encourage more sustainable patterns of travel, and adequate mitigation for any unavoidable effects of building new infrastructure. Any transport proposals must be considered in the context of the Quality of the Environment Chapter.*

3.2 The priorities in T12A and the explanation contained in new paragraphs 9.93-9.96 very much strikes a chord with the transport and accessibility priorities set out in the Regional Spatial Strategy. Moreover the priorities for the Black Country as set out in paragraph 9.93 seek to address the real issues of the Black Country that integrates well with the other proposals contained in the Phase 1 Review.

3.3 In particular the reference to the junction improvements to M6 (Junctions 1-2) and M6 (Junctions 9-10) accord with the RSS 'brief' for the Phase 1 Review, as set out at 2.4 above to look at ways of improving access to regeneration sites particularly on the eastern side of the Black Country.

3.4 The schemes in Policy 12A, together with existing schemes in Policy 12 represent a balanced approach that will make a positive contribution to enhancing accessibility in the Black Country in accordance with National and Regional policy.

3.5 In particular the approach outlined in 12A will support the urban renaissance of the Black Country and address the key drivers identified in paragraph 9.96 of the draft revision to the RSS.

3.6 Although not entirely conclusive there is some evidence provided by the West Midlands Area Multi Modal Study that national and regional objectives would be better met if transport improvements were concentrated within the conurbation closer to areas of need as now proposed in this Phase 1 Revision.

3.7 In support of this view it is worth noting the work of the Standing Advisory Committee on Trunk Road Assessment (SACTRA) and in particular their 1999 Report on Transport and the Economy which provides a good review of both academic and non-academic work on transport and regeneration. Although the relationship between transport improvement and regeneration is highly complex and there is quite a polarised view in terms of

benefits/costs, there does appear to be a degree of consensus that it is not inevitable that transport improvements always support regeneration.

- 3.8 It is submitted that the effect of new road building on regeneration requires local justification and that it is inappropriate to conclude that in a general sense that new roads equate to regeneration in all cases. What is more, investment in new roads can have the opposite effect than intended in that investment can be sucked out of areas that need to be regenerated. In the instance of the Western Bypasses the RPG Panel concluded at paragraph 8.5.28 of their report.

*“8.5.28 In our view the importance of the Western Bypasses to draft RPG’s strategy of urban regeneration is far from proven. Far from opening up the Black Country to economic development which would boost the renaissance of the area, the Panel considers that the new roads would more likely lead to the release of greenfield sites outside the conurbation. Such development would in our view be more likely to encourage further decentralisation than to assist the areas of need. We accept that whatever route was to be chosen, the environmental impact would be significant. These impacts would be made worse by any development of east-west link roads to open up employment sites on the eastern side of the Black Country. In our view no case has been made in terms of benefit at Regional level to justify the inclusion of the Western Bypasses in RPG.”*

- 3.9 Finally, it should be borne in mind that any investment into roads such as the Western Bypasses could divert investment away from schemes that have been proven to assist regeneration as included in Policy T12A.

#### **4.0 Conclusions**

- 4.1 The proposals, schemes and supporting documentation included within the Phase 1 Revision provides sufficient and necessary guidance regarding the regional context of improvements to the motorway network in the Black Country. Consideration of any proposal such as the Western Bypass would be outside the terms of reference of the Phase 1 Revision, would divert attention from addressing the real accessibility issues facing the Black Country and it is respectfully submitted waste the time of the Enquiry on matters that have previously been adequately considered by the RPG Panel and Secretary of State.

#### **5.0 STAFFORDSHIRE AND STOKE-ON-TRENT PLANNING FORUM**

- 5.1 Forum supports the approach to transport and accessibility in the Phase One Revision, but would wish to see the recognition on page 27 of the submitted document that the additional proposals will complement and as appropriate, reinforce the overall package of proposals in existing T12 is confirmed in the proposed Draft Revision paras 9.93 to 9.96.
- 5.2 Forum is aware that certain parties may, in their submissions and during the course of the Examination, propose that the Inspector recommends inclusion in the Phase One Revision of reference to the provision of some form of ‘Western Bypasses/Orbital Route’ around the western side of the Black Country largely within Staffordshire. Forum would wish to remind the Inspector that such proposals have been considered and discounted in the recent past primarily as a result of the unacceptability of their environmental impact. The ‘terms of reference’ for the Black Country Study and the Phase One Revision as set out by the Minister in the RPG11 specifically sought ‘ways of improving access to regeneration sites particularly on the eastern side of the Black Country’. Any suggestion that new road proposals to the west of the Conurbation/Black Country should

be included in the Phase One Revision are outside of its 'terms of reference' both in terms of the geographical boundaries of the Study and the sub-region and the matters specifically identified by the Minister.