Birmingham City Council

Councillor Tahir Ali
Cabinet Member - Development, Transport and the Economy
The Council House
Victoria Square
Birmingham   B1 1BB

Telephone: 0121 303 1077
E-Mail: tahir.ali@birmingham.gov.uk

_____

Our Ref: TA/PW

14 October 2015

West Midlands ITA Policy & Strategy Team
c/o Council House Extension
6 Margaret Street
Birmingham B3 3BU

Dear Sir / Madam

West Midlands Integrated Transport Authority Strategic Transport Plan: "Movement for Growth" Consultation

Thank you for the opportunity to comment on the draft Movement for Growth document. On behalf of Birmingham City Council I can confirm that we are broadly in support of the strategy as set out in the consultation documents.

However, there are points of detail and emphasis where I consider the Plan could be usefully improved. Please find below some comments and suggestions which I hope will contribute towards a final version which will continue to provide the strategic direction for transport in Birmingham and the West Midlands as we move forward towards Combined Authority arrangements.

If you have any queries regarding my comments, please contact me for clarification. I look forward to receiving a final version which takes account of the points I have raised.

Yours sincerely

Councillor Tahir Ali
Cabinet Member for Development, Transport and the Economy

T ALI/CORRESPONDENCE/

West Midlands Integrated Transport Authority Strategic Transport Plan "Movement for Growth" – Comments on draft strategy.

Challenges for the West Midlands

The document should set out an aspiration for the various areas of the West Midlands area to develop and adopt local Sustainable Urban Mobility Plans such as Birmingham Connected and Solihull Connected which will help to shape the delivery of Movement for Growth at the local level.

Land Use Policies and Planning Guidance

The National Planning Policy Framework (NPPF) states that 'Sustainable development means development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It is central to the economic, environmental and social success of the country and is the core principle of planning.'

It is recommended that the ITA and the metropolitan districts ensure that the appropriate land use planning policies are in place in order to facilitate the implementation of transport policies which ensure that development improves the sustainability of the transport network as well as encouraging sustainable travel habits.

Population Growth and Housing Development

There is also a need to consider the requirements of a growing younger population in some areas and the type of transport challenges this presents. There is a large population of around 20-24 which is mainly due to students coming to study at the City's Universities. In Birmingham 45.7% of residents are estimated to be under 30 years old, compared with estimates of 39.4% for England. In contrast 13.1% of our residents are over 65, compared with 17.6% nationally.

The transport challenges for younger people are particularly in terms of the cost of transport and their ability to access education and employment opportunities. There is also a decline in the number of young people learning to drive and own private cars and therefore there is an increasing dependence on other forms of travel. Birmingham has more people in the younger age groups, compared to the rest of England which has a greater proportion of older people.

The approach to housing within the document is limited and further consideration would be welcome. The work done by PBA on transport priorities linking to spatial economic and housing objectives estimates that there is a shortfall in provision of circa 38,000 dwellings by 2031 (against an overall requirement of 207,000) across the HMA (Birmingham, Black Country, Solihull, Tamworth, Lichfield, South Staffordshire, North Warwickshire, Stratford upon Avon (part) Cannock Chase, Bromsgrove, Redditch.

Most of this shortfall emanates from needs generated in Birmingham but which cannot be physically located within city boundaries. It also estimates an increase of some 300,000 full time equivalent jobs within the Housing Market Area which will have transport implications.

Similar analysis has been done in Coventry / Warwickshire and has drawn the same conclusions, albeit on a smaller scale. Whilst the reference in the document to population growth by 2035 being equivalent to the size of Liverpool may be correct, much of the development will be accommodated within the existing built up area (see above). That said, the short fall is significant and equivalent to a settlement the size of Redditch.

The PBA work also concludes that brownfield opportunities are diminishing, hence there is a need to review policy designations and consider greenfield sites through the likes of urban extensions along rail corridors, expansion of existing settlements etc., all of which will have implications for transport infrastructure and funding streams. It is imperative, therefore, that spatial and transport strategies should be developed in tandem.

The following approach is suggested:

- Consider capacity on the existing network to accommodate new development (NPPF para 32)
- Consideration of programmed infrastructure which will create new capacity which could accommodate additional development
- Consider whether the business case for new schemes could be improved by additional development or could new development provide a means of addressing existing connectivity problems or enhance / maintain existing levels of service?

To support this it is important to identify and protect sites / routes, where infrastructure is critical in widening transport choice and supporting development.

In terms of the data presented within the report some analysis of transport trends and the policy implications / response would provide some context, for example widening of TTWA and longer journeys to work, greater incidence of home working, change in mode of travel to work, major growth in rail journeys etc.

It would add clarity if the schemes shown diagrammatically on page 17 were named. A diagram showing major development activity and how this relates to the transport network would also be useful.

The document does not really tackle the accessibility to employment issues (which transport has a key role to play in) and there should be more explicit recognition of this e.g. the eastern corridor in Birmingham but this could also apply to other parts of the region.

Duty to Cooperate

Regulations identify ITAs along with ORR and highways authorities as Duty to Cooperate bodies, who have an obligation to engage constructively with local authorities in preparing local plans. Similarly local authorities have an obligation to have regard to ITA policies. Reference to this in the context of integrating transport and spatial planning should be made.

Environment and Public Health

Transport emissions account for 25% of Birmingham's controllable
CO_2 emissions (and this is likely to be similar for the other districts) and it would be useful to make this point in the document.

It is suggested that paragraph 2.15 is amended as follows to reflect that Local Air Quality Management is going through a revision and AQMA may not exist in the future. AQMA are not declared for oxides of nitrogen but for nitrogen dioxide. There should also be recognition of the impacts of transport noise. The public health evidence base should be updated to provide more current information. The following is suggested:

'Local air quality needs to be improved so that the West Midlands becomes compliant with all relevant emission limits for air pollutants, specifically that for nitrogen dioxide, thereby promoting Government's aim for UK wide compliance and promoting public health outcomes. Public health impacts of poor air quality centre on respiratory problems alongside cardio-vascular problems, although evidence for other systemic impacts is growing e.g. neurological. At a basic level, road transport emissions from exposure to fine particles account for around 1,460 premature deaths each year in the West Midlands (Estimating Local Mortality Burdens Associated with Particulate Air Pollution, Public Health England, 2014), whilst deaths attributable to nitrogen dioxide may be in the region of around half that figure, when calculated based on the approach used in the Health risks of air pollution in Europe – HRAPIE project (World Health Organisation, 2013). The need to reduce emissions from the transport sector in the West Midlands is therefore highly important, particularly related to emissions within built up urban areas as well as from the motorway network. Other public health issues where transport strategy can play its part are the need to tackle the West Midlands' high obesity levels and diabetes through more active travel, and to radically reduce the number and severity of road traffic casualties. Furthermore, transport related ambient noise also needs to be reduced'.

Our Vision

At 4.2 the document makes reference to 'fifteen policies under the five objectives'. Suggest that this is clarified as the document actually sets out that there are 'Four Challenges (2.4), 8 objectives (3.3) and 15 policies (p29)'.

Page 6 ECON 2 is a bit weak and would be helped by addressing the point with regard to transport as an enabler to accessing to employment opportunities. There does seem a lack of balance with more Environmental objectives and fewer on population growth, housing and the economy.

Twenty Year Vision for the Four Tiers of the Transport System and Indicative Phasing of the Long Term Programme

We would suggest that in addition this needs to include an International Tier which acknowledges the importance of the West Midland's transport links to international gateways e.g. particularly the need to emphasise good access to Birmingham Airport (as well as key existing and proposed developments in the area i.e. NEC, UKC, HS2 interchange), ambitions for a HS2 to HS1 link to enable direct international rail travel and also links to ports: particularly linking to where Midlands Connect may seek to improve capacity and capability of rail freight connections including gauge enhancement and electrification.

National / Regional Tier

High Speed 2 should be included as a Key Transport Priority for the National / Regional Tier. Overall HS2 does not get covered a lot in the document but it will be the single most important transport infrastructure project for the West Midlands (and the UK) over the next 20 years.

Metropolitan Tier

Within the Metropolitan Tier we would suggest that the strategy offers some flexibility to consider different types of mass rapid transit solutions e.g. exploring the potential for Monorail and Ultra-Light Rail which could both offer alternative options for developing parts of a mass transit network in certain circumstances.

Figure 4.5 on page 14 fails to adequately demonstrate the philosophy of the strategy to ensure that residents have good access to jobs and activities within the region. I would suggest that this might be demonstrated as a plan showing journey time isochrones to / from Birmingham city centre and to / from the relevant strategic centres – this would also help to identify where the challenges in terms of achieving these levels of connectivity currently exist.

The Metropolitan Cycle Network should also reference the Birmingham Cycle Revolution Design Guide which will have be completed by the time the final version of this strategy is approved.

Park & Ride

Continuing to expand Park & Ride capacity across the metropolitan and wider travel to work area is essential if we are to achieve mode shift and reduce car traffic into key centres. Birmingham Connected suggests that there are opportunities for new or expanded Park & Ride, or Cycle & Ride, facilities both inside and outside Birmingham. Three different types of facility have been considered.

- Strategic – sites towards the edge close to the boundary of the city, located close to key highways interchanges.
- Local – sites further inside the city boundary and;
- Micro – small scale sites potentially serving the rapid transit network, where provision is particularly made for people with disabilities and cycling.

Integrating cycling with the rest of the mass transit network will also be important and its consideration should be implicit in proposals. The Integration of cycle routes with high frequency public transport services; as well as providing cycle hubs and secure parking at Park & Ride sites; and consideration of cycle hire schemes across the network to enable people to continue their journey from a station/stop by bike should be included

Local Tier

For clarity 4.3.3 should state that the local tier is made up of all local highways (excluding those identified as part of the Metropolitan Main Road Network).

Within the local tier the strategy should also acknowledge that there is a need to continue to seek harmonisation across the region with regard to policy and particular modes e.g. taxis.

Smart Mobility Underpin Tier

The Strategy should set out the intention for the West Midlands to have a consistent approach for measures to support the uptake of Ultra Low Emission Vehicles in order to ensure success against objectives to reduce carbon emissions and improve air quality.

The City Council published the Birmingham Blueprint document in February 2015, the role of which is to provide recommendations on infrastructure roll-out in Birmingham in order to inform activities and investments within the sector, and advice for the Council on actions to be taken to support the delivery of the infrastructure plan. The focus is on the needs of fleet vehicles: taxis, fleet cars, vans, buses and trucks. There is a need for a joined West Midlands approach to the planning and delivery ULEV infrastructure to ensure appropriate availability, interoperability and to support future opportunities for funding e.g. from the Office for Low Emission Vehicles.

After each tier is a list of priorities but there is no explanation of why these are the priorities. The structure of the tiers is also difficult to follow and there is no real thread that can be followed from objectives through to priorities.

Road Safety

Road Safety is implicit within efforts to promote more sustainable and active travel and should be highlighted and set out in a separate section as opposed to being covered at the end of a section.

The City Council has recently consulted on a new draft Road Safety Strategy. The Department for Transport's Strategic Framework for Road Safety states that the government will not set a target or definitive forecast for road safety and that local authorities are able to set out their own road safety priorities, taking account of local circumstances and needs.

While the Framework notes that accurately predicting future levels of road deaths and injuries is not straightforward, it uses modelling undertaken by the Transport Research Laboratory to make estimated projections based on past rates and trends, the expected effect of current measures and projections of traffic growth. On the basis of the approach within the Framework, Birmingham has proposed working towards a forecast reduction of 40% in KSIs by 2020 from 2005 - 2009 average.

This will require co-ordinated effort with partners and communities to reduce
KSIs to this level. This will largely need to be underpinned by refocusing on certain key areas and vulnerable user groups to make the best use of available resources.

Smarter Choices

Smarter Choices is much wider than travel plans and links back to the wider agenda of smart mobility through providing people with accurate real-time transport information, provided direct to personal devices and vehicles, to improve the travel experience in the West Midlands and enable to make well informed decisions around when and how to make their journeys.

Car Clubs are referred to briefly within the context of integration but there needs to be a West Midlands strategy encouraging their development and take up linked to planning policies.

Servicing & Logistics

Freight is referenced throughout the document but the agenda is of significant importance to warrant its own section with a much stronger focus on the needs of 'freight' (in its widest sense) given the importance of a resilient and effective logistics network across the West Midlands to strengthen the area's economic positioning.

The ITA is developing a number of key initiatives around this agenda including the Freight Routing Study, the production of the Metropolitan Freight Strategy Addendum and the Freight Implementation Plan which will help to identify and prioritise work streams to progress the ITA's multi-modal freight agenda. More detail on these areas of work should be provided in Movement for Growth.

Through the Birmingham Connected Servicing and Logistics Package the Council is looking to develop strategies for servicing and logistics based upon the 'Olympics 4Rs', as developed by the Olympic Delivery Authority and Transport for London during the 2012 London Olympic Games.

The 4Rs refer to re-timing, remoding, re-routing and reducing deliveries. A number of measures covering these 4Rs were initially adopted for the short duration of the Olympic Games but have since been extended and made permanent as a result of the cost and operational efficiencies identified.

The interventions recommended in Birmingham Connected cover a range of physical, operational and behavioural measures, which when combined as a package tackle the 4Rs in a balanced way. Appropriate measures are now being considered as the Council moves forward with the introduction of the Green Travel District (GTD), with the initial being piloted in the Edgbaston / Selly Oak University and Hospital campus area. We would encourage Movement for Growth to acknowledge the 4Rs approach as a balanced approach to developing strategies for servicing and logistics.

Revenue based operation and supporting policies

It is suggested that this section should be retitled as Demand Management to reflect the important role of measures such as parking management, which can be cost-effective alternatives to increasing capacity by influencing travel behaviour and to deliver better environmental outcomes, improved public health, stronger communities, and more prosperous cities. P

Whilst there are no firm commitments with regard to the introduction of measures such as Work Place Parking Levies, Congestion Charging or Low Emission Zones presently, the document should not shy away from being upfront that these are potentially measures that the region may have to consider in order to deliver on the transport objectives and wider policy outcomes we collectively wish to realise.

Funding and Delivery

The funding section could emphasise the size of the Growth Deals by presenting a combined figure (i.e. £630m) before breaking down into what each LEP received, this emphasises the collective impact of the investment secured. GBSLEP secured £378.8m (an extra £21.4m was announced in Jan 2015 in addition to £357.4m to 7 July) (this is covered in para 6.3 but could be clearer).

The section could refer to the recent work undertaken by the ITA, by detailing some of the specific options being considered, and could also could make reference to other sources of government funding that could be targeted (e.g. OLEV / ERDF) and some of the innovative approaches that could be adopted.

The document makes no mention of Devolution or Devolution Deals and the broader context and direction of government policy should be reflected as an opportunity to secure funding and powers to deliver an engine for growth.

The document provides a high level, long term vision for the direction of transport strategy in the West Midlands and sets out a number of key deliverables over the twenty year plan period across the various tiers. However within that there is very limited detail on the expected implementation dates for some of these deliverables. Whilst it is acknowledged that some of the timescales wold be purely indicative at this stage, it would help to provide dates to build a picture of the expected outcomes are at various stages over the twenty year plan period.

The ITA should also consider producing supporting shorter term documents which set out the key deliverables and funding with an e.g. five year planning horizon. These should be regularly updated to take account of changes in policy, funding availability and emerging issues and trends such as the economy or technological advances.