

Introduction

Thank you for the opportunity to comment on the Development Management in Birmingham Publication Document.

In general Transport for West Midlands (TfWM) – the transport arm of the West Midlands Combined Authority (WMCA) is relatively supportive of much of the documents vision.

Most of our comments relate to section 5 Connectivity where development policies detail transport and traffic considerations to individual development proposals. Below outlines our detailed comments:

Connectivity: DM 14 Highway Safety and Access

The policy currently focuses very much on highway capacity and whether a reasonable level of service can be met. Yet our own policies promote alternative sustainable modes of transport to reduce the demand on the road network and encourage people away from a dependence on single occupancy cars. To align with TfWM's Regional Transport Plan: 'Movement for Growth', (which should be clearly referenced in the plan) we encourage a presumption in favour of sustainable transport provision and infrastructure; in turn echoing the draft Birmingham Transport Plan and Draft Parking SPD.

Furthermore, in addition to the referenced Construction Traffic Management Plan, we also recommend that developers sign up to Construction, Logistics and Community Safety (CLOCS) to deliver safety standards and codes of safe practice concerning construction traffic to development sites.

Public transport

A greater focus on better connectivity, legibility, quality, usability and capacity in public transport is recommended within the policy DM14.

A high-quality integrated public transport system is essential to promote sustainable travel patterns in the city, with less reliance on private cars. We need to continue to upgrade public transport infrastructure at key locations and ensure all new developments improve walking and cycling links to stops or stations.

Ensuring bus routes are commercially viable in the long run and in accessible locations is fundamental to the attractiveness and feasibility of providing bus services to new developments. Also, any additional demand (caused by new development) on the existing public transport network should also be fully accommodated for and captured.

Walking and Cycling

New development can facilitate change to people's walking and cycling habits by providing permeable spaces with direct, safe and attractive routes. This in turn, enables people to lead healthier and active lives and reduces pressures on highway capacity.

These interventions will then contribute to achieving the ambitions of your draft Transport Plan, Birmingham's Walking and Cycling Strategy and Local Cycling and Walking Infrastructure Plan, which currently are not referenced in the policy.

Key Route Network (KRN)

The KRN is defined as the main road network which supports businesses and logistics and accommodates movement of rapid transport vehicles and core bus services. It is made up of around 7% of Birmingham's road network and serves the main strategic demand flows of people, goods and services and provides connections to the national strategic road network.

The day to day operations and maintenance of the KRN remains with Birmingham City Council, yet the strategic oversight, coordination and management of the KRN is undertaken regionally by WMCA.

The WMCA therefore has concurrent powers on the KRN in areas such as road safety, bus lane

contraventions/permit schemes and air quality and it is essential the KRN is captured in this Development Management Publication.

In taking a strategic overview of the KRN, we recommend that any new development is only allowed:

- 1) new access points onto the KRN where it can be demonstrated that there is no reasonable alternative elsewhere;
- 2) there is no adverse impact on the KRN and surrounding local neighbourhood network,
- 3) access is not near any road junctions; and
- 4) any new access points do not adversely affect the safety and free flow of traffic (particularly active travel and public transport) and pedestrians.

Officers within TfWM can provide further details on these recommendations.

Public realm

The document also fails to demonstrate how important public realm measures are to encourage healthy living and active travel.

Good public realm helps create high quality, safe environments (in line with TfWMs West Midlands Cycling and Walking Guidance) including good cycle routes, cycle parking facilities and cycle hire etc, which then allows for sustainable and active modes to be chosen.

Innovation

Technological advances and innovations are changing the way people travel and the operation of the transport network. TfWM aims to embrace such opportunities, whilst ensuring that the introduction of new technologies do not compromise the safety or security of people.

Based on current regional transport policies, we feel DM14 currently fails to consider innovation in sustainable transport or maximizes the availability of appropriate technology to enhance and support

new developments. As a Combined Authority, we are exploring a range of new products, such as digitalisation of highway information, payments and ticketing systems, as well as new forms of transport like demand-responsive transport, driverless vehicles, bike-sharing and electric vehicle charging stations.

In addition, other technological changes are helping to reduce congestion by removing vehicles from the road, particularly in terms of deliveries and collections. Therefore, all these examples should be incorporated into the design of new developments and considered fully in section DM 14 as well as link across to the Telecommunications section DM16, where appropriate.

Connectivity: DM 15 Parking and Servicing

Parking is often oversupplied and stimulates demand for further car travel. Appropriate management of parking standards is thus imperative; helping to contribute fully to the delivery of sustainable development – encouraging active travel, public transport and low emission vehicles.

As we have raised in our response to the Parking SPD consultation, this document would also particularly benefit from including information on how the parking policy could support the future proofing of the urban environment for new technology. This includes considering the role of technology to manage wider parking controls e.g. on-street loading and bay booking and management systems to support the increase in EVs including electric buses, E-bikes and cars as well as autonomous vehicles.

Birmingham City Centre and its local centres have high levels of demand for freight, servicing, delivery and collection services. These must be managed to allow residents to access the goods and services and to enable businesses to continue to grow. To achieve this, we feel the plan needs to

consider consolidated facilities for freight, servicing and deliveries in new development, and applicants should be conditioned to produce Delivery and Servicing Plans which encourage provision for low-emission vehicles, micro-consolidation and sustainable last mile delivery modes.

Furthermore, the provision for servicing, collection and deliveries within new developments should be appropriate in size, type and anticipated frequency of arrival of vehicles; and capable of being shared with other businesses. Service and delivery provision must also be met in such a way that minimises any adverse effects on the highway, the public realm and wider environmental effects such as noise.

The document also fails to capture the letting of car parking spaces in new developments. Across other local authorities, car parking spaces are being let on a short-term basis so that the usage of these spaces and/or areas can be kept under review. Where under-used, car parking spaces can be converted into other land uses. This has been effective particularly, where local authorities have trialed car free developments.

There is also no detail on how taxis would be supported in relation to new developments together with freight movements, HGVs and coaches - particularly where development is near major tourist destinations and transport hubs. With the coming of the Commonwealth Games in particular, this should be considered.

Furthermore, TfWM feels any additional off-street parking can undermine efforts to encourage use of more sustainable modes of transport, which is necessary to reduce congestion and improve air quality and road safety. New on-street parking provision should therefore only be made where it is replacing existing off-street public parking, and should include provision for disabled people's parking, electric vehicle spaces as well as car club spaces and cycle parking to encourage more sustainable travel choices.

The policy should also consider how parking will play a key role in the wider network resilience agenda. Over the next few years, our transport network will be transformed through investment in roads, rail, Sprint and Metro systems as well as large scale land use development. Having effective parking policy's in place to manage such growth will then help manage congestion whilst ensuring the city still thrives.

Finally, we feel public transport, and in particular buses take the brunt of many of the parking issues which then impact on their reliability and free flow. A stronger stance in favour of buses is therefore requested by TfWM throughout policies DM 14 and 15.

Planning conditions and financial contributions

The document should strongly demonstrate the importance of financial contributions which will facilitate improvements to the operation of the public transport network and associated infrastructure such as Sprint, Metro and bus routes, interchanges, car clubs, electric vehicle charging facilities, public realm improvements and open spaces.

Funding should also be sought to improve access to public transport facilities through various walking and cycling measures including cycle routes, cycle hiring schemes and cycle storage facilities. Finally, contributions should be sought on conditional Delivery and Servicing Plans which encourage provision for low-emission, micro-consolidation and last mile delivery modes.

Other issues

Consideration into future trends that could impact on how people travel in the region should also be included. Trends including younger people shifting away from private car ownership, and older people entering retirement age could see shifts in travel behavior and these need to be picked up in the document.

Telecommunications: DM16

The West Midlands have been selected by the Government to be the first large-scale 5G testbed for the UK. This will create opportunities to deliver things differently and will bring new opportunities and experiences to citizens and businesses in the region.

It will particularly enhance our digital services and extend mobile connectivity. It will also go some way to meeting the Government's long-term strategy for improving digital connectivity. More information on the 5G programme can be sought from WMCA Officers and we request this is emphasized in this section along with the opportunities 5G will bring for new developments.

Conclusion

We like to further reiterate our support for the partnership approach that has been taken to addressing the strategic transport needs to date. Yet we feel the additional issues we have mentioned in our response will help strengthen the Management Plan and new developments coming forward in the future.

In the meantime, we would appreciate you continue to keep us informed of the progress of this document and of any significant planning and transport proposals that emerge. If you have any queries or require any additional information, please do not hesitate to contact me.

Further Information

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