

**Redditch Borough Councils and Bromsgrove District Councils response  
to the Third Draft Worcestershire Local Transport Plan (LTP 3)**

**1. 0 Draft Local Transport Plan (Main Document)**

- 1.1 Page 9 details the role of the Worcestershire Local Enterprise Partnership (LEP). The Worcestershire LEP has now emerged as successful; it is considered that a focus should be on how the LEP can play a significant role in transport development to allow the economic development of the county. There should be clarity on whether previously the delivery of the Plan was reliant on funding levered in by the LEP or not and if not now the LEP has been approved there are additional opportunities to implement more schemes, if so this needs to be managed carefully. Bromsgrove and Redditch also form part of the Birmingham LEP, opportunities should be explored to improve transport infrastructure between North Worcestershire and Birmingham. Officers question the implications this may have on LTP3 and if flexibility has been built into the plan to accommodate any potential future infrastructure as a result of the Birmingham LEP.
- 1.2 The LEP is mentioned on page 10 as the main vehicle for engaging in the dialogue between the Worcestershire Economic Strategy and transport, how much of a role will the LEP play and who will manage the dialogue gap between the LEP. It is questioned whether the dialogue, in particular with regard to the role of the LEP will be equal between all Districts and Boroughs and how this communication will be managed.
- 1.3 LTP3 should have more regard to the Draft Worcestershire LEP, with references to the County priorities of delivering strategic employment sites and related infrastructure (services, highways, access utilities, etc.), which are needed to secure sustainable economic growth and a low carbon economy. Existing and new businesses require the right infrastructure with better access to the businesses themselves and their supply chains with improvements to the motorway network and the east to west links. LTP3 fails to recognise the relationship with travel and employment areas.
- 1.4 Local Authorities would like to work closely with Worcestershire County Council (WCC) to determine what their infrastructure requirements are. If it is determined that growth figures are to be determined by local authorities a significant amount of work on how much influence infrastructure requirements will have on the growth figures will need to be completed. It would be helpful to determine whether infrastructure requirements will restrict the amount of growth put forward by the

District/Borough. Joint working would be helpful to determine this figure.

- 1.5 Page 22 states the following “*considering permitting motorcycles to use bus lanes subject to any safety concerns being suitably mitigated*”. During the preparation stages of Redditch Borough Councils Core Strategy (Issues and Options May – June 2008) it was requested that bus only lanes were considered for opening up to the wider community traffic if it was deemed that additional community safety issues were present for example natural surveillance and vitality to the District Centres. This was strongly opposed by WCC. Officers would like to seek a view on whether this can now be re-introduced into the Core Strategy with safety concerns being mitigated. Officers also question why Motorcycles are the only method of transport being considered for this.
- 1.6 Page 23 details the importance of services for example working from home, it may be useful to reference the emerging work being conducted at the WCC level and District levels within regard to infrastructure planning and how these two plans can support each other. In particular it may be worth highlighting the important role of this work in this paragraph.
- 1.7 Page 32 refers to the need to get developers to contribute towards transport infrastructure. This needs to be managed correctly through Development Control/ Management Officers at the District and Borough level as this is the main contact developers have when beginning negotiations and preparing Planning Applications.
- 1.8 Page 34 refers to climate change; it is considered that there should be co-ordination between the LTP and District/ Borough climate change strategies to ensure conformity and consistency with each other.
- 1.9 Page 43 states that a Strategic Environmental Assessment, a Health Impact Assessment and an Equality Impact Assessment has been completed, a Sustainability Appraisal is also needed for this document.
- 1.10 Page 47 the second of this paragraph should be ‘deliver’ not ‘delivery’. Also the sentence regarding the Redditch Evening Bus service is not complete and does not state who provides the previous taxibus service currently. The Councils have been made aware that the transport subsidy from WCC is to be cut, what the effect of this cut will be on the Bus Service and how will there be consistency between the aims of LTP3 and budget cuts on the ground is not detailed, Officers have been informed that this cut will effect evening and weekend bus services. The Councils would like more detail on the effects of these

cuts including when the effects are likely to be seen and whether consultation with the Councils can influence the way the cuts are managed i.e. can other arrangements be put in place to ensure services are not reduced. The point regarding the Alexandra Hospital does not specifically state what has been the result of the partnership working.

- 1.11 Page 48 details the Redditch Urban Package. It is questioned whether the intention of the Smarter Choice Programme is to promote an enhanced transport choice in Bromsgrove or Redditch, as this activity is listed under the Redditch package and also under the Bromsgrove package.
- 1.12 Redditch Borough Council strongly supports the delivery of the Redditch Town Centre package. Officers wish to work closely with WCC to ensure the delivery of this project.
- 1.13 Bromsgrove District Council Officers fully support the improvements highlighted as part of the North East Worcestershire Transport Strategy on page 48. This support is particularly endorsed on developments within Bromsgrove Town Centre, including; junction improvements and highway alterations to reduce the impacts of congestion; public realm enhancements; delivery of the Bromsgrove Rail Interchange and promotion of enhanced rail services. The links particularly by public transport between the Town Centre, Railway station and the proposed expansion sites to the north and west of the Town which have been highlighted as Bromsgrove's priorities by the District's LSP, emerging Core Strategy and Town centre AAP should be highlighted and prioritised more specifically in the LTP3.
- 1.14 The fourth bullet point in the North East Worcestershire Rural Package (Page 49) should include the 'District', instead of only mentioning the 'Borough'.
- 1.15 There is no clear link between the package detailed on page 48 and the map on page 49.

### **Transport Policies**

#### **2.0 Cycling Policy**

- 2.1 Generally support the provisions of the cycling policies; however it would be helpful to have a clear delivery plan as to how the modal shift will be achieved in the county.

2.2 In terms of Policy C1 and C4, Officers support partnership working with Local Authorities to continue to develop a comprehensive cycling network, particularly regarding financial contributions from new developments.

2.3 As part of the emerging Bromsgrove Town Centre Area Action Plan, the Council will be aiming to provide adequate parking for bicycles and therefore support Policy C7.

3.0 Development Control (Transport) Policy

No comments.

4.0 Integrated Passenger Transport Policy

4.1 Due to the rural nature of Bromsgrove District the need for reliable bus services is fundamental to the provision of sustainable and inclusive communities; therefore Officers recognise the importance of Policy IPTP15.

4.2 Although this policy document states (particularly para. 2.5.3) that most bus services are highly variable around the County, with most frequent services provided on key urban and inter-urban routes, more clarification should be made on how this problem is going to be tackled. There should be more policy depth on producing services that are reliable, with greater emphasis on rural areas as these account for a large proportion of the District. Bromsgrove in particular has poor bus links to other parts of the County and this should be addressed within the LTP. Rural services across Bromsgrove are diminishing, instead of being enhanced, which is increasingly becoming a cause for concern, especially in regards to the provision of sustainable rural communities. LTP3 could make reference to the Worcestershire Local Enterprise Partnership, which addresses urban transport issues and rural connectivity, focusing on sustainable and affordable solutions.

4.3 As highlighted at 1.13 above Bromsgrove District Council's Draft Core Strategy and Town Centre AAP requires new bus routes to serve the Town Centre, linking both existing and new residential areas to key facilities such as the railway station using the Town Centre as the focal point of the network. LTP3 should make reference to these proposals to aid the delivery of such aspirations.

4.4 Bromsgrove District's Local Strategic Partnership (LSP) stated that funding for the 'Gold Standard' Bromsgrove bus station would need to be included in LTP3, but there is no reference to this. There is a clear lack of the mechanisms that will be used to deliver a number of

elements of the LTP3, which need to be addressed. There are a number of funding implications that are highlighted within Bromsgrove's LSP that are not explained within LTP3. The document mentions a bus stop audit was commissioned as part of LTP2 but not how this will be enhanced in the next plan period. There should also be references to the funding streams needed for railway station improvements.

- 4.5 Officers want to ensure that both Bromsgrove and Redditch retain the level of bus service currently provided and that this is improved where appropriate, or officers are willing to work with the County Council and landowners/developers of key sites to progress developments that can assist with subsidised routes. This is essential for both Core Strategies and the delivery of LTP3 (see paragraph 1.10).

5.0 Intelligent Transport Systems Policy

- 5.1 There should be a focus of investment on the intelligent transport information provided at the Alexandra Hospital. This is a suitable location for potential future applications.

6.0 Motorcycling Policy

- 6.1 Please see comments above regarding opening bus lanes.

7.0 Multimodal Freight Policy

- 7.1 Officers would suggest that there needs to be some realism applied with regards to the encouragement for more sustainable freight transit. There are no details on the investment for this strategy and no reflection of areas where there is little opportunity for new rail or water related freight.
- 7.2 This would benefit from reference to the Hereford and Worcestershire Air Quality Strategy
- 7.3 The Policy to reallocate existing HGV parking away from urban areas needs to be implemented with caution. Any changes would need to ensure accessibility to HGV vehicles which is difficult in some areas.
- 7.4 Paragraph 2.11 does not define what freight consolidation centres are and therefore does not set out what the requirement is for this to enable provision.
- 7.5 Officers consider the multimodal freight policy will provide a comprehensive policy base to enable the delivery of schemes to enhance the efficient movement and operation of freight by all modes

around the County. Making optimum use of the navigable waterways is supported to capitalise on the abundant opportunities that exist across Bromsgrove District.

- 7.6 Officers question whether there is an opportunity to link business rate to transport development to allow direct funding from those who benefit from improved services.

8.0 Smarter Choices Policy

- 8.1 The concept of Travel Plan Bonds (SCP12) is supported. Although more information on how the County Council intends to develop and implement the travel plan bond with its partners and at a local level is essential so that this concept can be reflected in the Borough, City and District Council's Local Development Framework. Any viability issues at a Borough/District scale would need to be considered in its implementation. The policy should provide greater detail on how these bonds are likely to be implemented.

- 8.2 Officers welcome the station travel plan concept and how this would be progressed.

- 8.3 Station Travel Plans (SCP13) would also be extremely beneficial to Bromsgrove and Redditch, particularly for the planned regeneration of Bromsgrove Railway Station and the expansion of the electrified line from Barnt Green and with regard to Redditch given planned regeneration of the train station area. Bromsgrove's LSP also specifically notes the desire for extra parking at Wythall railway station although this has yet to be demonstrated as being needed. Where parking provision is a major problem at the Districts stations SCP13 is supported as it may alleviate some of these pressures.

- 8.4 For the Residential travel plans (SCP16), there would be limited opportunity to implement this policy through County Council Development Control given that the majority of applications for residential development are processed at Borough, City and District level.

- 8.5 Support the provision of 'grey fleet' (Policy SCP15), it is considered that delivery should be carried out with employers to ensure reduction in the need to travel, for example Bromsgrove District Council and Redditch Borough Council now have a Single Senior Management Team and a number of 'shared services'. Officers consider that this has resulted in a significant increase in 'employee trips' between the two authorities. Therefore the provision of this policy, although supported should be approached with caution and with thought to delivery and the

other priorities that are being implemented around the County for example sharing services.

9.0 Walking and Public Realm Policy

9.1 Officer's support the policies identified in this section as strong links can be made to Bromsgrove's Town Centre AAP. Close collaboration between Worcestershire County Council and Local Authorities as highlighted in W1 is supported as it maximises the potential of the walking network and public realm. Improvements to the public realm in particular (W4) are supported as this is an area that has been identified in need of attention throughout Bromsgrove.

9.2 There are a range of locally distinctive issues in Redditch that need to be considered when aiming to increase walking through LPT3. For example in Redditch the design of the amount of subways and indirect footpaths reduces the amount of people that walk. These design issues need to be addressed before the walking policy can be successful. This issue is addressed in Redditch's emerging Core Strategy.

10.0 Traffic and Parking Management Policy

10.1 Policy TMP1 - Redditch Borough Council has committed to a car parking review of Town Centre Parking provision and reference to this is required within this policy. Is considered that a range of innovative options should be considered when completing a car parking review which will meet the objectives of LTP3 for example employee parking options in the Town Centre.

10.2 Paragraph 2.2.1 lists a number of settlements across Worcestershire that have parking concerns and require tailored, strategic traffic management and parking plans. Officers are in agreement that parking is an area of concern in Bromsgrove and traffic management and parking plans are needed across the District, particularly the town centre.

11.0 Transport and Air Quality Policy

11.1 Figure 3.1 on page 10 would benefit from a key.

11.2 The mention of the Air Quality Management Areas (AQMA) across Bromsgrove District is welcomed, along with the positive steps being taken to mitigate deteriorating air quality. The two new designations (Hagley and Stoke Heath) are supported as this will lead to AQMA Action Plans which will subsequently improve the air quality in these areas.

12.0 Transport and Climate Change Policy

- 12.1 Officers agree with the overall aim of reducing congestion and the encouragement of walking, cycling and passenger transport. The emphasis on congested urban areas is commended as Bromsgrove District Council are also attempting to alleviate congestion in the Town Centre through the emerging Core Strategy and Bromsgrove Town Centre AAP.
- 12.2 Although references are made to flooding, more prominence can be made throughout this policy to ensure that main transport routes in Bromsgrove and Redditch (particularly Feckenham from Swans Brook) are not flooded and/or alternative (sustainable transport) routes are available during extreme weather.

13.0 Transport Safety Policy

- 13.1 Due to the rural nature of Bromsgrove District Policy TS4 regarding rural road speed limits is needed to ensure community safety.

14.0 Transport Asset Management Plan Policy

No comments.

15.0 Transport Accessibility Policy

No comments.

16.0 Other comments

- 16.1 Many motorway and/or railway verges are used by wildlife to move around, hence the importance of wildlife corridors. There is no mention of this topic throughout LTP3, which would be beneficial to Local Authority Green Infrastructure studies. There could also be specific regard given to the sub-regional Green Infrastructure Strategy.
- 16.2 Officers have received verbal confirmation previously from the County Council that the Bordesley by-pass would not be a deliverable infrastructure project that would be implemented. It would be helpful if this could be put in writing to both councils to form part of their Core Strategy Evidence Base.
- 16.3 Officers wish to ensure that the implications of future development on transport as evidenced in both Authorities Transport Assessments are



fully incorporated into the provisions of LTP3 for example junction improvements where they are necessary.

- 16.4 Numerous policies and aspirations throughout LTP3 are 'subject to funding', yet the strategy does not explain what contingency plans will be used if the necessary funding is unavailable. As well as funding issues, there is a distinct lack of the delivery mechanisms that will be used to implement LTP3, more details should be explained throughout the report.
- 16.5 Overall, Officers commend the numerous references throughout LTP3 referring to collaborative working with Local Authorities and the private sector to successfully implement the plan, although more could be said in regards to specific areas. The 'Bromsgrove Urban Package' within the main document fails to reference the joint working needed with Bromsgrove District Council to create an integrated movement network around the Town Centre which links with a range of transport options in the wider area.