



Bromsgrove District Council Response to Local Transport Plan 4 (LTP4)

Response

1 Bromsgrove District Council (BDC) welcomes the production of a new Local Transport Plan for the County, although serious reservations remain about the effectiveness of the plan as currently drafted. The consultation document states that LTP4;

'Sets out the priorities for the County. It identifies the approach to managing the increased transport demand that is fully consistent with projected housing development and economic growth.'

2 It is the Council's view that whilst the above statement maybe correct, a key feature particularly in relation to Bromsgrove is not addressed in LTP4. There are future development needs identified but not allocated in the Bromsgrove District Plan (BDP) which currently do not feature in any context in the LTP4, failure to even acknowledge this issue is a significant omission within LTP4 to the extent that the Council cannot support the plan as it is drafted.

3 It has been widely known for a number of years that the Council will be reviewing the recently adopted BDP, including reviewing the green belt to find additional housing for both local needs and the wider needs of the Greater Birmingham Housing Market (GBHMA) area, which the district is a part of. This review as a minimum will be looking for land for 2300 houses which is approximately 118 hectares. There will also be a likely need to safeguard land for beyond the plan period of approximately 202 hectares to meet expected future development needs although this is could possibly change as future housing and employment needs are calculated. This figure does not include land for any wider GBHMA development needs, which cannot be met on brownfield and other suitable sites in the main urban areas.

4 The Council acknowledges that LTP4 cannot address these issues directly with scheme proposals until more information is known on the final scale and location of development. BDC considers that as currently drafted policy **BR1- Bromsgrove Transport Strategy** is too limited in its scope to adequately address this future challenge. The current wording does nothing to futureproof and add capacity into the Bromsgrove transport network to avert future congestion problems and consequent adverse impacts on air quality.

5 It is welcomed that at officer level indication has been given that the wording of BR1 can be altered to allow for a more overarching and longer term strategy to be produced in relation to Bromsgrove. This overarching strategy which will consider all modes of transport is likely to be a key element in shaping how the District develops in the future. It is essential that progress on the development of this strategy is reported back at regular intervals, and subjected to wider stakeholder consultation to ensure that it evolves in a manner which addresses the challenges being presented to those who currently, and in the future want to live and work in Bromsgrove District.

6 BDC would like this strategy to be seen as an opportunity for transport considerations to more heavily influence the decisions on where all forms of future development should take place. The Strategy should play a positive role in addressing infrastructure deficiencies which currently exist, and which will not be solved without intervention over and above that which can be secured from additional development. Simply mitigating the impact of future development is not an option BDC can support.

7 An evidence based investment strategy needs to be developed which can be used to secure necessary infrastructure funding. This strategy needs to be robust and flexible to ensure it can address the requirements for a range of local and central government funding regimes which will inevitably change over the lifetime of any plan. The strategy needs to be fully integrated with other similar strategies being developed in adjoining areas, particularly to the north in the West Midlands Conurbation to ensure that full advantage is taken of all additional infrastructure investment and possible funding that becomes available.

8 Further to the main strategic issue raised above the council would also comment that there is no discussion of the known problems in Bromsgrove and how the existing problems, let alone as mentioned above a vision for how future predicted ones, can be addressed. The current congestion problems are a key concern for Bromsgrove not only for the resident population but for the businesses that operate in the area who often cite the local transport infrastructure as being one of the major barriers to economic activity. The LTP documents as drafted seem to list a large number of ad hoc schemes within no overall defined strategy or prioritisation. It maybe that there is a strategy to these schemes but no detailed discussion is provided to explain how they interrelate to address the wide ranging concerns many stakeholders have already expressed in the early stages of consultation. In some instances the schemes identified are not explained in sufficient detail or with justification for the need and the prioritisation. One example of this is the priority for looking for more car parking at Bromsgrove station, when the station has only just opened and car park never seems to be at capacity.

9 Whilst the Council is not necessarily objecting, the reason for combining Bromsgrove and Redditch together as 'North East Worcestershire' also seems confused. The areas are very distinct areas, with markedly different socio economic structures, so therefore to say this is done for socio economic reasons and because both Councils relate to Birmingham is confusing. It is our understanding that the transport challenges the authorities face are very different. As the description of the North East Worcestershire Transport Challenges in LTP4 is very generic it is difficult to ascertain from the plan what these challenges really are across North East Worcestershire. Consequently without this understanding it difficult to form a view as to whether grouping Bromsgrove and Redditch together is for the benefit of each authority. Particularly as it is assumed that full strategies as per the one identified for Bromsgrove above will be produced for all areas of the county, including Redditch. As a whole again we assume these local elements will form a coherent transport strategy for the whole of Worcestershire which links complementary strategies in adjoining areas such as the West Midlands conurbation and Warwickshire.

10 In summary it is believed that nothing short of a radical programme of investment in all modes of transport infrastructure across the District will be needed to ensure Bromsgrove can cope

with the pressures likely to be exerted on it over the next 20-30 years. The Council want to work closely with WCC to develop a future plan and investment strategy which can sensitively deliver both significant housing and employment growth in the future whilst still retaining the attractiveness and local distinctiveness of the District.