


Bromsgrove District Council  
Redditch Borough Council

Via Email



11 November 2013

## **RESPONSE TO BROMSGROVE AND REDDITCH "SUBMISSION DRAFT" LOCAL PLANS AND INFRASTRUCTURE DELIVERY PLANS**

The following letter sets out the Highways Agency (HA) response to the current consultation on the proposed 'submission drafts' of the Bromsgrove District and Redditch Borough Plans.

The response comprises the following main sections:

- The role of the HA in Plan Making
- The transport evidence base and the acceptability of transport impacts on the Strategic Road Network, arising from the planned growth.
- The response to the policies and approach set out in the Bromsgrove District Plan
- The response to the policies and approach set out in the Redditch Borough Plan

### **The Role of the HA in Plan Making**

The Highways Agency (HA) is responsible for maintaining, operating and improving the Strategic Road Network (SRN) in England on behalf of the Secretary of State for Transport. It is committed to supporting Government objectives on sustainable transport and climate change, and recognises the need for closer integration of transport and land use planning in order to minimise trip generation at source, to encourage sustainable modes of transport, to minimise journey lengths and to promote accessibility for all. This is set out in the Department for Transport (DfT) Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development'.

In this instance, the key area of responsibility for the HA, within the Redditch Borough and Bromsgrove Districts, consists of the M5 including junctions 4 and 5 and the M42, including junctions 1 to 3.

## **The transport evidence base and the acceptability of transport impacts on the Strategic Road Network, arising from the planned growth**

The HA have worked closely with Worcestershire CC (WCC) to assess the transport impacts arising from the development identified in both the Bromsgrove and Redditch Plans. It is important to note that, at this stage the assessments for each Plan area have not been considered separately, on the basis that it is deemed necessary to ensure that the cumulative impacts are fully understood and that there will need to be a need for cross boundary and joint working in order to ensure that the overall level of development is accommodated effectively.

The assessment work has utilised a model developed by the HA which covers the M5 and M42 through the area. The future year traffic forecasts were based on information provided by WCC from the gravity models developed to assess the plans.

### **Up to 2022**

The outputs of the assessment work has indicated that the following improvements to the SRN will be required to support the planned growth to 2022 and should therefore be included in the IDPs for both authorities.

- Significant alterations to the layout of junction 1 of the M42 to improve traffic flow on the A38 and ensure that queues on the off-slip do not reach back to the motorway mainline.
- Improvements at junction 2 of the M42 to improve throughput of the junction; these are likely to be minor in nature pre 2022 and it is acknowledged that this will still result in increased queues on the A441.
- Improvements at junction 3 of the M42; the expansion of the westbound off slip to 3 lanes in order to ensure queues do not reach back to the mainline, the exact length of the widening to be determined as part of more detailed analysis.
- Improvements at junction 4 of the M5; there is a need to increase A38 capacity in the southbound direction at this junction in order to ensure that queues on the southbound off slips do not reach back to the M5 mainline. The exact nature of the scheme is still to be determined, though initial testing of extending the two-lane merge on the A38 has demonstrated a positive impact on queues at this junction.

(Junction 5 of the M5 has not been considered in detail and, at this stage the HA has outstanding concerns that forecast congestion on the A38 may result in re-routing of trips from the area to junction 5. This junction was examined in the context of two large planning applications in Droitwich, and this indicated that with the SWDP growth and the additional site at Yewtree, capacity at this junction will become constrained and more recent analysis indicates that there are still issues at the junction).

The improvements bulleted above are in the early stages of assessment but the indications are that they will provide sufficient capacity to accommodate the planned growth to 2022. It should be noted that the improvements will not eradicate all problems of delay and congestion, and that these will still remain even with improvements. This makes it imperative that policies within the Plan seek to ensure that traffic growth associated with future growth is managed effectively.

It is anticipated that the IDP, as a live document, will be updated to reflect the ongoing assessment work and that both Redditch and Bromsgrove Councils will work closely with the HA to ensure that the IDP remains accurate and up to date.

### **Beyond 2022**

The HA have also performed assessments of the impact of the planned growth on the SRN to 2031. The analysis indicates that beyond 2022 there are limited options for further physical improvement on the SRN to accommodate the forecast additional traffic. From this point capacity constraints on the adjoining local highways network will restrict the ability of such improvements to have any real benefit. 2

The HA and WCC are committed to working together to establish the most appropriate response to this in order to ensure that the overall growth requirements for the Districts are not compromised. However, at this stage the means of delivering growth beyond 2022 has not been fully identified and there is no provision for this in the IDPs to date.

In summary, the transport evidence base is adequate to demonstrate to the satisfaction of the HA that planned growth to 2022 can be accommodated satisfactorily and to this point the plan can be considered sound. However, beyond this date, for the remainder of the Plan period, the infrastructure implications have not been fully identified, particularly in relation to interaction between the SRN and local highways. We do however acknowledge that significant analysis has been undertaken to examine the wider local road impacts and this has been used to inform the SRN analysis. We are also concerned that the mechanisms for delivery and associated timeframes for schemes have not been identified. For these reasons, the HA considers that the current Plans may both be 'unsound' on the basis that they are not effective. We do however believe that further intensive work may result in a change in this position prior to EIP. 1 2

It should be noted that, going forward, Bromsgrove and Redditch Councils will need to be more proactive in their engagement with the HA on potential allocations and SRN impacts. On the basis that land use planning is fully integrated with transport planning (as set out in the relevant Government guidance) it is critical that the two authorities adopt a coordinated and integrated approach to the identification of transport impacts and to ensuring their acceptability, not least to avoid confusion and abortive work. Following recent discussions, the HA anticipates that more effective engagement between the Authorities will follow.

### **Bromsgrove District Plan Policies**

The HA are generally satisfied that the plan seeks to focus new development in the most accessible and sustainable locations which will optimise the prospects for reducing the need for travel, and that measures are incorporated in the Plan to create mixed use developments and to provide local facilities and employment alongside new residential communities. 3

This is a key requirement given that a high proportion of Bromsgrove residents rely on out-commuting and levels of car use are some 13% higher than the national average.

The HA supports the Council's vision and strategic objectives which reflect the requirement to improve sustainable modes of travel and to enable more sustainable transport choices. We are satisfied that this objective is a prevailing theme which is reflected throughout the Plan's main policies.

Notwithstanding this, the HA is bound to emphasise that traffic generation associated with future development should be managed down in order to minimise the residual impacts associated with congestion, delay and air quality issues. This is particularly important with respect to the strategic allocations in Bromsgrove. 4

In relation to this, the HA welcomes the confirmation in sections 8.193 that proposals which are likely to have material traffic impacts will need to be supported by a Travel Plan. This section could be strengthened by including reference to the mechanisms which might be used by the Council to ensure that Travel Plan commitments are delivered in practice; these could include the use of planning conditions or planning obligations, for example. A reference to attaining a specific modal shift target provide a clear reference for demonstrating the Council's commitment to achieving more sustainable development outcomes. 4

The reference in paragraph 8.194 to the requirement for Transport Assessments to be undertaken, in accordance with the GTA, as part of development proposals is also welcome. Encouragement to pre-application engagement with the highways authorities could also be incorporated in this section, to ensure effective scoping of work and early agreement to any mitigation package. 5

For the Bromsgrove sites, policy BDP5A incorporates a requirement to define a transport strategy with measures to reduce car travel, provide sustainable links, improve bus access and travel planning – alongside an expectation that financial contributions will be required towards infrastructure provision. This must be implemented in practice, in order to ensure that traffic impacts on the local and wider transport network are acceptable.

The inclusion of Policy RCBD1.0 dealing with cross boundary issues is welcome. The need for an overall Transport Assessment and an integrated strategy for ensuring delivery of infrastructure and effective transport management is key to the delivery of the overall growth of the area. X

With regard to Policy BDP6 – Infrastructure Contributions, the Highways Agency is engaged in ongoing discussion with Bromsgrove District Council and WCC with regard to highways improvements schemes which will form part of the IDP. It is expected that funding for the schemes identified will be secured via developer contributions although the mechanisms for doing this need to be finalised.

With regard to policies BDP4 Designated Employment Sites the HA would like to see greater emphasis on a need to manage down traffic levels from these sites with specific policy references to the need for transport assessments and travel planning where expansion or intensification on these sites is planned. 6

The policies contained in BDP16 go some way to covering this contingency; however we are concerned regarding the emphasis on the suitability or otherwise of station car parking. Whilst the HA agree that short distance trips to stations are not sustainable; there are concerns that restrictive policies for car parking could result in some longer distance trips still being undertaken by car. There is a need for a balance in this approach, offsetting the unsuitability of these trips against a desire to facilitate the removal of commuter journeys off the wider network. To this end we would suggest that there is a commitment to implementing station travel plans to reduce the demand for car parking for those living close to stations.

Overall, the Highways Agency are content that the policies within the draft Plan incorporate a strong commitment to achieving sustainable transport objectives in Bromsgrove and to reducing the risk of unacceptable traffic impacts on the SRN.

### **Redditch Borough Plan Policies**

The HA are generally satisfied that the provisions for adopting a settlement hierarchy and for creating new employment, community and other services and amenities in accessible locations, within the Borough boundary should give rise to the most sustainable development patterns, including reductions in the levels of out commuting and the overall number of journeys undertaken by car.

This applies to the proposed location of Strategic Sites in the plan which relate well to the existing built form and are generally located close to existing facilities and infrastructure.

The commitments in Policy 19 are welcome which seek to encourage safer, more sustainable travel patterns and to reduce the need travel. This could include a reference to Travel Plans playing a key role, and a link to subsequent policy 20. However, the wording in Policy 20 and supporting text in relation to the SRN references requires clarification as follows.

Whilst the M5 and junction 3 of the M42 are key to Redditch, the M42 junction 2 should also be included as another key access point to the SRN for the borough. In addition the report refers to motorways and trunk roads as being part of the 'Primary Road Network'. We can confirm that the motorways and trunk roads that fall under the remit of the Secretary of State are referred to as the 'Strategic Road Network'. The Primary Road Network refers to local routes of strategic importance that are managed by the local highway authority, in this case, Worcestershire County Council.

Policy 20, which sets out the requirements for transport assessment and travel planning as part of future development is welcome. However we note that there is no reference to Travel Plans being required for new residential development and would urge the Council to include this.

The explanatory text to this policy also notes that transport impacts will need to be addressed to the satisfaction of WCC and the Council. As a statutory consultee and key stakeholder in relation to highways impacts, the need for the HA to also be consulted and satisfied that development impacts are acceptable is also a pre-requisite and should be referenced.

The HA are also concerned with respect to the variance of requirements between policies 19/20 and the requirements contained in the policies related to the specific strategic sites. There appears to be no consistent requirement for the sites; in some locations travel plans are discussed, whilst in others 'smarter choice' approaches are identified. In addition there is no consistent approach to the requirement for financial contributions to wider infrastructure with some sites containing explicit references and other sites having no specific policy.

We therefore have outstanding concerns that the policies within the plan are not consistent and that this may prejudice the promotion of sustainable modes, reducing car travel and delivering suitable mitigation. We strongly recommend that the Policies 19 and 20 are reviewed against the Strategic Sites policies to ensure consistency of approach.

The transport policies could also define the mechanisms by which transport mitigation (whether new infrastructure or traffic management measures) will be secured, including through the use of planning conditions, or planning obligations for example attached to any grant of planning permission.

### **Overall Conclusions**

The HA consider that the development strategies reflect the requirement to achieve sustainable transport outcomes and that the main allocations will provide good opportunities to minimise the need to travel, with good accessibility and integral measures to enhance the opportunities for modal shift. The HA welcome the approach in the Bromsgrove Plan where sustainable transport, reducing out commuting and car travel are themes that are carried through the entire plan and are set out coherently throughout the policies in the plan. The HA notes that there is a need to improve this theme in the Redditch Plan to ensure compatibility throughout the document of policies for sites and general over arching transport policy requirements.

The HA are also satisfied that the plan allocations within the Bromsgrove and Redditch Local Plan up to 2022 can be accommodated, provided they are delivered alongside the identified improvements to the SRN, which are considered to be reasonable and deliverable based on current knowledge. These schemes will require further detailed examination to establish exact costs and timescales, and in order to identify the most appropriate mechanisms for ensuring their timely delivery.

Beyond 2022, however the HA is not yet assured that the transport impacts arising from new development will be acceptable. The means of delivering growth beyond 2022 has not been identified and there is no provision for this in the IDPs to date. For these reasons, the HA considers that the current Plans may fail the tests of soundness on the basis that they are not effective. The HA will therefore require that further work is undertaken to assess transport needs beyond 2022 to ensure that we can be satisfied of the plans soundness prior to EIP. This work has been ongoing in the months leading up to the consultation and it is expected that further analysis will be undertaken by WCC to inform the HAs final position in relation to the Plans.

Going forward the HA would appreciate a more coordinated approach by the planning authorities and welcome further engagement with the relevant officers and members, particularly in relation to how development post 2022 can be planned for and how the tests of soundness can be effectively met. We will continue to work closely with WCC and welcome the continuing support and openness of the highway authority to date.

Yours sincerely

