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Dear Sir or Madam,

A457 Dudley Road – Proposed Highway Improvements

Birmingham Friends of the Earth welcomes the opportunity to comment on the latest proposed Dudley Road Highway Improvement Scheme. We are an environmental campaigning and educational organisation based in Birmingham, engaged with advancing the principles of environmental sustainability and positive environmental change, with an emphasis on issues which affect Birmingham.

Summary

We strongly object to the scheme, in its proposed form, for the same reason that we objected to the previous version and to plans to widen other radial roads in Birmingham. This approach is not an improvement. Road widening should be off the table, since it is expensive, unpopular and does not work.

This scheme's primary purpose appears to be to increase capacity for motor vehicles, which will encourage more and/ or faster traffic. We believe this will result in a number of adverse environmental and health impacts both on the communities through which the road passes as well as having adverse knock-on effects in other parts of the city. Our key concerns are summarised below.

The primary objective is to increase highway capacity – all other considerations such as improving public transport, walking, cycling and environmental quality appear to have been secondary. Environmental quality barely features in the consultation.

One of the aims is to increase traffic flow to the City centre – which works against the Clean Air Zone proposed there for summer 2021. More traffic will increase CO2 emissions, contrary to the council's Climate Emergency Declaration and aspiration to be net carbon neutral by 2030. No figures are given in the plan for traffic or air quality.

A number of trees will be destroyed along sections of the road.

Pedestrians will have the perception that a widened road is less easy to cross than a narrower road and the effect will be to deter walking. The scheme will reduce the attractiveness of the shopping experience and increase severance. Pavements will be narrowed in places and a significant length of shared use pavement on the south side will be shared with cyclists, providing a further deterrent to walking. On the Lee bridge over the canal the pavement will both be narrowed and will be shared with cyclists.

We believe that the proposals are at odds with a number of key city council policies on the environment, health, quality of life and sustainable transport. In particular it goes against the draft Birmingham Transport Plan of January 2020, which we have strongly supported in public consultation, as we shall show below.

Our main areas of concern are detailed below.

1. Weakness of the Outline Business Case – Costs v Benefits

The scheme as it is presented to public consultation is not actually a business case, because no benefits are quantified to compare with the costs. Are these plans good value for money? It would only be possible to answer if there was a calculation of the benefits of the scheme, but this has not been included.

We note that there are very considerable financial costs to the City Council in developing the scheme, in its construction and in the maintenance long term. The total cost is quoted as £29 million, but we suspect that this revised plan is concealing substantial extra costs, since a lot more land will need to be compulsorily purchased, compared with previous versions. Moreover, there is an unknown liability in the event that the Lee bridge over the canal is further damaged by the road widening.

There is not enough government funding available for the scheme, according to the report to the City Council's Cabinet, therefore a much reduced version may have to be designed at some point.

Traffic measurements and traffic forecasts as made before COVID, pre March 2020, are now very much out of date. No-one knows if the overall numbers of vehicles per day will return, hence the time savings from the scheme are unknown also. At the end of 2020, the road is working well at reduced traffic demand, with almost no congestion.

Regarding future traffic forecasts, we notice that the draft Birmingham Transport Plan 2020 cited evidence of an established falling demand to travel for work and leisure purposes in Britain. The Commission on Travel Demand has collated this trend of falling demand to travel **before** the pandemic and produced an info graphic about it http://www.demand.ac.uk/wp-content/uploads/2018/05/FutureTravelDemand_infographic.pdf

Traffic has seen an unprecedented fall during the pandemic in 2020. Looking ahead to 2021, although vaccination will allow returning to people to return to work, they will also lose their fear of using bus and trains returning modal share to public transport.

The two important trends affecting demand for transport, already underway before COVID, were a slow but steady switch to on-line purchasing of goods, rather than from shops, and more and more people working from home, rather than commuting daily to an office. Both trends have been accelerated by the pandemic and practically all commentators believe that these trends will continue after it is over. Time spent commuting and driving is a cost which most people would prefer to avoid.

The AA has warned against making investment decisions based on past demand to travel, given the change to home working and shopping in 2020, some of which may be permanent <https://www.bbc.co.uk/news/science-environment-52137968>

Population forecasts are now out of date and they have been sharply reduced as a result of the UK leaving the EU. The Office for Population Statistics has revised its estimate of population growth downwards <https://www.birminghammail.co.uk/news/midlands-news/what-happen-birmingham-population-next-16108013>

The new housing developments along Dudley Road are in line with Birmingham's Big City Plan for people to live close into city centre, shortening or removing commuter journeys. The new residential areas on brownfield sites are designed for "city living" where use of a private car is very

much discouraged. For example, the new development being built on the Soho Loop has been specified such that for every three flats there will only be one parking space. The intention is that the new residents will be relying mainly on buses, cycling and walking for their journeys. So transport planning cannot rely on the new housing creating extra demand to justify more road capacity in the area. If anything people will be traveling less.

City Hospital is moving, in part, from its site on Dudley Road over the border into Sandwell, with a loss of car parking spaces for visitors. We see visitors parking on the A457 now, but that will disappear when the move to the new site happens. NHS has strong plans to reduce driving to its sites. in line with carbon reduction.

If the road did become a faster transport corridor then drivers could be induced to use it to avoid delays on other nearby roads, for example to avoid congestion on Hagley Road.

2. Reduction in space for pedestrians

The scheme offers some safer provision for pedestrians to cross roads; however since the road will be wider with more lanes, especially at two junctions, pedestrians will perceive it as more of a barrier, which takes longer and is more difficult to cross. Most of the crossings are single stage crossings, but how long will pedestrians have to wait after pressing the button to get the chance to cross the road? There is possibility that savings to drivers and bus passengers will be lost again by more light controlled crossings. The scheme would increase the severance presented by the Dudley Road for the surrounding community. Movement would be further prioritised at the expense of Place.

3. Cycle lanes

We accept that the cycle lanes are on the whole of good quality and would be of benefit to a cyclist compared with the present situation on Dudley Road. The cycle lanes are fully segregated, but not always continuous. The part from the front of the City Hospital and along towards Spring Hill is good too. The route to/from Summerfield Park is very attractive, but quickly fizzles out. However, we believe that the eastern end where the cycle lanes terminate at A547 Spring Hill roundabout is not a good destination, since cyclists would then be faced with crossing the very busy Middleway A4540 Icknield Street to continue to the City Centre. No doubt these cycle lanes could be extended in future but they seem to lack a strategic analysis of the typical journeys that cyclists would like to make and do not justify a £29 million scheme.

Most cyclists prefer to be away from busy roads, so as to avoid the pollution, noise and danger from traffic. The blue route along A34 Walsall Road was costly to build, but it is very lightly used by cyclists and BCC needs to learn from this experience. By contrast, the Rea Valley cycle route, to Cannon Hill Park and beyond, uses a combination of quiet back roads and some segregated paths and it is used by hundreds of cyclists every day.

There are alternatives to a costly segregated cycle path that follows the A457. In 2020, we have seen an excellent “pop up” cycle scheme that takes cyclists through low traffic neighbourhoods right into the city centre (Colmore Row) via the Jewellery Quarter. With small improvements, this could be a pleasant route to the city centre. In the Birmingham Cycling and Walking Strategy there is another attractive route suggested to the Indoor Area and Centenary Square from Dudley Road, which we have cycled and believe it would be very good if it were clearly marked and sign posted. Other quiet routes will result when the new residential area of Soho Loop is developed with its “traffic free streets”. Low traffic neighbourhoods, like that being trialled in Lozells offer cheaper,

more attractive and more comprehensive cycling networks, compared to the approach of widening main roads. This is the strategy pursued by the Bee Network in Greater Manchester.

4. Bus lanes

The bus lanes would be for peak hours only and be used for parking at most other times. The lanes are on both sides, but are not continuous. Buses going westbound from Spring Hill island would use the bus lane, but once the bus reached St Patrick's School the bus lane finishes and all traffic going straight on is confined to a single lane at the junction with Heath Street. Could cause bottlenecks for buses and other vehicles.

How would bus lanes be enforced? At present there is very little enforcement, At the webinar there was talk of cameras that would enforce this, but no definite plan to install them. Bus lanes reduce the overall efficiency of the road when they are not strictly enforced, but enforcement could reduce the attraction of local centres and the viability of businesses, who do need access.

We have discussed the pros and cons of bus lanes at length and we have come to some conclusions. The first is that if this road was already a full width 4 lane carriageway then we would be happy to see 2 lanes used as bus lanes. This would accord with the Birmingham Transport Plan which supports re-allocation of road space for active travel and public transport. However, in the case of Dudley Road, widening the road would achieve the opposite, since at off peak times it would be re-allocating pavement and other nearby land for use by vehicles in contravention of the Birmingham Transport Plan, which does not favour road widening or junction widening. It is the buses which hold back traffic and restrain its growth, by giving a time penalty for driving in the peak period.

Despite widening at a cost of £29 million, the capacity for general traffic could actually go down in places, because of the space allocated to bus lanes. We have seen on Tyburn Road and Bristol Road how strong can be the pressure from drivers to use a bus lane when they see long queues and an empty bus lane, so we may end up with two wide traffic lanes.

5. The scheme is in opposition to the aims of the draft Birmingham Transport Plan

See...

[Birmingham transport plan | Draft Birmingham transport plan | Birmingham City Council](#)

The **Birmingham Transport Plan** 2020 states: "These measures are designed to:

- Reduce transport's damaging impact on the environment, supporting Birmingham's commitment to becoming a carbon neutral city by 2030
- Eliminate road danger, particularly in residential areas
- Connect people with new job and training opportunities
- Reconnect communities by prioritising people over cars
- Revitalise the city centre and local centres."

Below we compare the features of the revised Dudley Road scheme and find that it does not accord with the BTP.

Aims of BTP:	Fit with Dudley Road plans?
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Reduce transport's damaging impact on the environment, supporting Birmingham's commitment to becoming a carbon neutral city by 2030	No, the scheme will encourage more driving which will produce more carbon dioxide.
Eliminate road danger particularly in residential areas	Yes in terms of people crossing roads, but no as it is likely to lead to more speeding on the road
Connect people with new job and training opportunities	No evidence has been given by the council for this.
Reconnect communities by prioritising people over cars	No, the scheme does not overall prioritise people over cars.
Revitalise the city centre and local centres	No, it certainly will lead to a worse local centre due to increasing traffic. There is much evidence that road widening leads to a barren environment where people will not wish to shop or socialise. No measures have been included to revitalise the local centres – which have been neglected and run down for many years,

We support the approach of the BTP to manage demand to drive rather than to supply increased road capacity.

6. An Alternative Vision

Birmingham Friends of the Earth suggests that rather than seeing the Dudley Road as an engineering problem of how to increase the flow of traffic, instead we should see it as part of a much wider community of people living and working in this quarter of the city. These people suffer from poor housing, high unemployment, or low pay and below average health outcomes. To compound this, they have to bear the noise of a busy road and suffer damage to their health from the high level of air pollution.

The council has produced top down plans, with no effective consultation with local people, as the plans were developed. They only have the chance to be consulted after a huge amount of time and money has been spent on developing the plans.

A survey needs to be undertaken to find out the needs of local people, residents, bus users, pedestrians, community and religious groups, shop keepers and small businesses. Find out what they want to see improved in the area and find out how the road works for them at the moment. We think it is time to stop believing that the council planners know better than the people in the area. The council recently obtained government grants to environmentally improve Erdington high street. Why can't the same be done for Dudley Road? Is it because it is perceived as nothing more or less than a transport link? Wouldn't it be great if the surrounding pavements were re-paved with attractive paving, if new trees were planted, if flower beds were put in, if large advertising hoardings were removed? Dudley Road could become a popular destination for shoppers, looking more like Kings Heath or Harborne High Street. But not a single one of these ideas is included in the plans, except for some new trees.

We suggest an approach be made to an organisation like Planning for Real which explains a clear process for really engaging with local people to draw up plans to improve their lives and their neighbourhood. See [Planning for Real](#)

7. Conclusion.

We strongly urge the council to think again about these proposals and not to continue to follow the strategy of road widening, so as to secure DfT funds.

Instead, we urge the council to re-think the scheme, starting with the point of determining the needs of the people of this area for a better life, rather than seeing it as a simple engineering project to widen a road from A to B.

020Birmingham Friends of the Earth 14.12.20