

Birmingham Transport Plan – GBCC Consultation Feedback

About Us

The Greater Birmingham Chambers of Commerce (GBCC) is a membership-led, business support organisation that has acted as the voice of local businesses since 1813. Today, we continue to connect, support and grow local businesses.

We are one of the largest Chambers in the country with more than 3,200 member companies covering six geographic areas across the region (Birmingham, Burton, Chase, Lichfield and Tamworth, Solihull and Sutton Coldfield) and four themed divisions (Asian Business Chamber of Commerce, Future Faces, Commonwealth Chamber of Commerce and the Transatlantic Chamber of Commerce).

We employ c.100 staff, delivering practical support for businesses. In 2019 we organised over 250 events for over 13,000 delegates, issued 33,000 export documents to businesses trading internationally and brought the latest news to over 14,000 subscribers and 90,000 social media followers five days a week.

Background

Over the last decade, Birmingham has undergone an economic renaissance underpinned by the highly anticipated arrival of HS2 and the broader economic regeneration this will generate and facilitate. Record levels of FDI, numerous high profile organisations relocating to the city and securing the 2022 Commonwealth Games all point a city on the up. Nevertheless, ingrained issues over air pollution (and the associated health issues which accompany it), lower than average productivity levels, a shortage of land for employment and housing along with job polarisation in the job market means that the city faces a set of interlinked challenges right now. Within this context, Birmingham City Council (BCC) has produced an outline Transport Plan which sets out its favoured approach in meeting these existing challenges and demands for the future.

As the topic of sustainability becomes even more prominent over the next ten years, the measures put forward by BCC are designed to:

- Support Birmingham's commitment to become carbon neutral by 2030
- Reduce road accidents and road danger in residential areas
- Connecting people to opportunities with new job opportunities
- Reinvigorate the city centre and local centres

In particular the Transport Plan will focus on four "big moves" which BCC believe will help it achieve its strategic objectives:

- ***Reallocating Road Space*** – BCC will change the allocation of road space to move away from single occupancy private cars in order to promote usage of alternative modes of transport
- ***Transforming the city centre*** – The centre of Birmingham will be transformed through creating a network of pedestrian streets and public transport services and cycling networks. Access to the city centre for private cars will be limited with no through trips. Specific measures include introducing a Clean Air Zone and introducing a network of "cells" within the city centre to restrict through trips for private vehicles.
- ***Prioritising active travel in local neighbourhoods*** – In particular promoting active travel – walking and cycling and reducing the use of cars in a bid to foster community spirit. Specific measures include introducing 20mph as the default speed limit for all residential streets and local centres and managing logistics deliveries to focus on out of hours periods

- **Managing demand through parking measures** – Parking will be used as a means to manage demand for travel by car through availability, pricing and restrictions. Where developmental potential exists, land occupied by car parking will be put to more use. Specific measures include introducing a Workplace Parking Levy (WPL) and introducing controlled parking zones.

BCC Transport Plan Consultation – GBCC Business Engagement Programme

(Please note - our work and consultation on this was done before the impact of Covid19 had truly impacted the UK and the current raft of measures introduced to limit the spread were introduced. As such, all comments need to be taken in this context and with the understanding that much may change as Birmingham and the rest of the UK and world eventually emerge from the current state of affairs).

BCC announced they would be running a consultation on the draft Transport Plan from the end of January to the end of March (this date has subsequently been extended to early April in light of recent events). As a membership body which represent thousands of firms across the city region that are either based in the city or travel through it, the GBCC Policy Team has worked closely with the business community in order to gather their views on the proposed plans and what they see as the main opportunities and challenges which will emerge from these measures.

Specific elements within the engagement plan involved:

- Hosting a private roundtable with GBCC Patrons to discuss the potential impact the measures within the Transport Plan would have on the business community
- Hosting two briefing sessions with the wider business community to launch the GBCC Clean Air Zone Toolkit for businesses (click [here](#) for more information)
- Inviting senior officers from Birmingham City Council to present an overview of its plans to the Greater Birmingham & Solihull Business Transport Group
- Inviting senior officers from Birmingham City Council to discuss the key facets of the draft Plan to a range of businesses based in the city and wider region
- Sending out a survey to over 16000 business contacts across Greater Birmingham to gauge general business sentiment on the proposed measures

As mandated by central Government to reduce illegal levels of air pollution, a central part of the plan rests upon the introduction of a Clean Air Zone in the heart of the city – an initiative which has been over two years in the making. Subsequently, the GBCC has formally partnered with BCC on a programme of engagement in order to ensure local firms are fully prepared for the rollout of the Zone and to make sure they have the support required to deal with the proposed changes – much of which is summarised in the Clean Air Zone Toolkit for businesses (click [here](#) to access). As such, this consultation response will focus less on specific operational facets behind the running of the Zone and the other parts of the Plan. Instead we will explore the wider thematic points around the set of proposed measures and what they will mean for a business community which is currently experiencing unprecedented challenges with the advent of the Coronavirus.

The remaining structure of the Consultation Feedback will focus on:

- The potential benefits that the Birmingham Transport Plan will bring the business community
- The possible challenges that the measures listed in the Transport Plan will bring to the business community
- The type of supplementary support the business community would need if the Transport Plan was implemented in its current guise
- Summary and Recommendations

The potential benefits that the Birmingham Transport Plan will bring the business community

Throughout our engagement process, a number of businesses welcomed the sentiment behind the ambitious plans to cut transport related carbon emissions and create a healthier and more prosperous workforce. Ultimately, cutting overall levels of congestion would unlock a raft of economic benefits for firms based within and outside of the city (click [here](#) for an earlier study the GBCC conducted which explored this agenda in greater detail) which would make the region an even more attractive proposition to investors and residents alike. Maximising the opportunities created by the development of HS2 was also hailed as an important part of realising the wider ambitions behind the plan. For example, the Curzon Street Masterplan sets out plans for £724m of investment in the surrounding area and is expected to create 36,000 new jobs in the heart of the cityⁱ.

There was also solid support for specific elements within each of the key strands of the Plan. The first component which examines the prospect of reallocating road space was cautiously greeted, particularly with the emphasis on delivering new Sprint routes in time for the 2022 Commonwealth Games and extending the Metro service to connect the city centre with the local & mainline train services (which would also incorporate the HS2 stations across Birmingham and Solihull). A number of business also approved of the new segmented cycle routes along commuter routes and also understood that it was necessary for BCC to support Transport for West Midlands (TfWM) in delivering the Regional Traffic Coordination Centre – a single hub for transport authorities, emergency services and transport operators to manage the network during incidents and a vital instrument in keeping goods and people moving across the region during a period of heavy disruption as we prepare for the advent of the Commonwealth Games and the arrival of HS2.

In relation to the section covering the transformation of the city centre, the reintroduction of cross city centre bus routes received almost complete backing as a number of employers highlighted the inconvenience their staff members faced in catching a multiple buses in order complete journeys which are sometimes only a mile or two in length. There was also support for greater investment in improving cycling networks and walking infrastructure which was somewhat tempered by the possible disruption this process would create to an already overburdened road network.

Prioritising active travel in local neighbourhoods and reducing car travel for trips less than one mile also received backing from a number of firms – particularly the measures around restricting car usage outside schools and creating green travel districts in areas such as Sutton Coldfield (it was suggested that this specific action could help stimulate demand on the ailing high street for example). Finally, in regards to the section on managing demand via introducing a variety of car

parking measures, there was significant backing amongst a number of employers to introduce more viable park and ride schemes in order to make using public transport more attractive to their staff – however, this was also some uncertainty as to where these sites would actually be based both inside the city and across the wider region; there was a clear agreement that BCC would need to work closely with TfWM in establishing where best to place the sites in a strategic fashion which would benefit businesses and their employees across the region as a whole. Ultimately, there was a general acceptance across the board that the unreliability of the public transport system was hampering its usage and many welcomed BCC's commitment to improve the capacity and accessibility of the network in an attempt to reduce single car usage and encouraging employees to use alternative modes of travelling.

The possible challenges that the measures listed in the Transport Plan will bring to the business community

A common argument which emerged from across the sessions was the lack of concrete detail in each segment of the Plan which in turn, led to a number of businesses raising concerns around the potential challenges the implementation would bring if it went ahead in its current guise. Firstly, a number of operators were anxious around the lack of clarity in regards to the movement of freight and how this would fit in with the introduction of the 'cell' network in the city centre. For example, an inconsistency was noted around maintaining city centre access for service and logistic vehicles but freight journeys would be shifted to out of hours deliveries; a number of freight operators questioned the subsequent impact this would have on local residents (in relation to noise pollution) and the wider functionality of the industry. If this policy is to be effective, then BCC will need to identify an appropriate location for the proposed consolidation centres and work closely with city centre businesses (particularly retailers) to understand their delivery patterns and requirements along with determining the practicality of this strategy.

Many businesses were also concerned around the real-world application of a number of the measures in the Plan with a particular emphasis on the Clean Air Zone and Workplace Parking Levy (WPL). As expected the appetite for introducing a WPL was not particularly strong. For example, one business owner referenced the fall in revenue that a number of retailers and restaurants surrounding the Snow Hill area faced when free parking was removed on Sundays. Recent research undertaken by the GBCC reveals that 29% of firms across the region saw their cash flow position worsen – the highest figure on record since the midst of the global financial crisis and a trend which will surely become more pronounced and concerning as the fallout from the Coronavirus develops over the coming monthsⁱⁱ. Clearly, if these measures are not implemented in the right way, they will simply add to ongoing woes of local businesses and beyond the Clean Air Zone, it is essential that BCC put steps in place a series of exemptions and mitigation packages to help those firms that are going to most affected.

It was also agreed that for BCC to support businesses in the right fashion, then a formal impact assessment would need to be commissioned and published which would demonstrate the effect these measures are likely to have on firms based within the city. For example, whereas distribution analysis undertaken by BCC around the impact of the Clean Air Zone highlighted the number of businesses that are based within the parameters of the Zone, it did not specify how many of these were likely to be affected by the rollout of the Zoneⁱⁱⁱ. Clearly, a similar feasibility study will need to be undertaken for the other parts of the Plan (in particular in relation to the introduction of a WPL). In a similar vein, there were also concerns over the lack of a clear evidence base around how the

reallocation of road space could potentially lead to blockages on the road network managed by Highways England.

Whilst the business community welcome the mitigation packages announced by BCC in relation to the Clean Air Zone, there were major concerns raised around sharing sensitive employee data with the Council particularly in relation to storing data in relation to an individual's home address, vehicle registration and income and the ongoing risk as to whether this could become a cybersecurity issue. Certain businesses also highlighted the fact there are specific loopholes which could be exploited by individuals and impact on the effectiveness of the overall scheme (non-eligible individuals that register for exemptions via another member of the household whose earnings were below the set threshold as an example). Clearly there is a degree of ambiguity which will need to be ironed out before the Zone is formally launched and BCC will also need to make sure there is consistency in its application of similar measures across the other components of the Plan.

Finally, a notable concern raised amongst businesses related to the communications strategy that BCC would look to use to push ahead with the plans and the dangers associated with mixed or unclear messaging. For example, many individuals referenced the fact that lots of firms in the city still view the Clean Air Zone as a congestion charge; a number referred to the confusion generated by the concept of the cells network, the uncertainty around the reconfiguration of the A38, the unease that the WPL is simply a mechanism to generate money and the perception that all private cars would be banned from the city centre. Clearly, if the messaging is distorted or muddled, then the overall support for the plan will also be diluted and it becomes even harder to secure the buy in required from the business community to properly implement this strategy; a scenario which could make Birmingham less attractive to potential investors and possibly lead to a loss of competitive advantage in comparison to the likes of Leeds and Manchester.

The type of supplementary support the business community would need if the Transport Plan was implemented in its current guise

Given the rapid escalation of cases related to COVID-19 and the associated impact on the business community, many organisations felt it would be necessary to delay the roll out of certain measures listed in the Plan. In particular, whilst we welcome the news that the start of the Clean Air Zone had been delayed, we would urge the Council to review the start date towards the end of this year, especially as the Government is committed to leaving the European Union in December which will no doubt add to the uncertainty that businesses are facing. In addition, it is only fair for the package of exemptions and mitigation measures to be effectively extended to offer further support to the businesses most impacted by the fallout related to COVID-19 (most likely to be those based in the leisure, retail and hospitality sectors as a starting point) once the Zone actually goes live.

Reviewing the timeframes associated with other key measures within the Plan would also be welcomed. Realistically speaking, it would take around 6-12 months for businesses to adapt to the introduction of the Clean Air Zone, which would also crossover with preparation for the Commonwealth Games and the extension of the Metro up to Edgbaston; in turn, this is likely to lead to a severe level of disruption on the road networks and where possible, it would be helpful for BCC to review the complete programme schedule to see if certain projects could be delayed to minimise any negative impact on businesses in the city.

Beyond the Clean Air Zone and support for those impacted by COVID-19, there are also a series of interventions which BCC could make to support those likely to be impacted by the

introduction of the WPL. For example, offering clarity on whether the parameters of the WPL are likely to be the same as the CAZ would be a start so businesses can proceed with their own feasibility studies. Longer term clarity on the charging model is also essential in order to allow firms to effectively project what their long term cost outlay would be once the WPL goes live. Finally, we would urge the Council to engage with firms to understand how many are likely to be impacted by this programme and to create a package of incentives or exemptions which would help those companies that are likely to be affected by the initiatives. Possible ideas include offering discounts to businesses that have EV charging points, green travel facilities or where possible, offer their staff the ability to work from home – a situation which is likely to become more common in light of recent developments.

In addition, a number of businesses that participated in the briefings believed the best possible type of support the BCC could offer in this instance was direct clarity on its wider plans and what that meant for segments of the business community. For example, there seemed to be confusion around the role of Taxis in the introduction of the ‘cell’ concept and whether for example, Hackney Carriages would be able to travel through the various cells. Furthermore, a number of businesses were unsure how private hire taxis would be incorporated into this model.

Linked to this point, a number of vehicle owners had a real concern over the amount and reliability of electric vehicle charge points in the city – clearly, the infrastructure behind this would need significant investment from the Council to encourage drivers to move to cleaner vehicles and especially in light of the Government’s decision in the latest Budget to reduce the level of financial incentives on offer for drivers to purchase an electric vehicle^{iv}. Moreover, the Plan would be strengthened if there was more reference the role that small rechargeable vehicles could play in the wider strategy moving forward (with certain individuals citing references to e-bikes and e-scooters for example).

Summary and Recommendations

The Birmingham Transport Plan is an all encompassing strategy which sets out a high level blueprint for tackling a number of the ingrained issues in the city and the GBCC welcomes the ambitious intent behind the proposals. Clearly, our city is likely to undergo a number of profound changes over the next decade and BCC will need to move quickly in order to keep pace with the evolving socio-economic landscape. Nevertheless, the implementation of the Plan will need to be tempered with pragmatism and we would urge the Council to tread with caution as businesses start to emerge from one of the most disruptive and challenging periods witnessed in our lifetimes.

A common thread running through this response is the importance of messaging and controlling the narrative to ensure buy in is secured from businesses and residents alike. Prior to the outbreak of the Coronavirus, there was a dose of scepticism around the viability of the strategy and if the Council proceeds without modifying elements of the Plan (particularly in light of recent developments), then levels of cynicism are likely to intensify. Nevertheless, the difficult period we find ourselves operating in also offers the Council an opportunity to put the foundations in place which will strengthen the case for making these changes – assessing levels of air quality during the lock down period or putting steps in place to help firms transition their staff to work at home in the long term (where possible) are just a couple of pertinent examples.

As shown in the work that the GBCC has undertaken around the Clean Air Zone, the types of measures referenced in the Transport Plan need to be rooted in evidence, rigorous in detail and anchored in pragmatism; essentially that means going beyond high level references around

recalibrating the use of the A38 for example. Instead, we would urge BCC to undertake in-depth economic impact assessments on each of the key strands in order to ascertain just how many businesses will be affected by the proposals and how many would need support in order to adapt to the changes. Unlike the introduction of the Clean Air Zone which was mandated by central Government, BCC has to take complete ownership of these measures and will need to work closely with the business community to ensure these proposals are effective in delivering on their overarching intentions.

In order to increase its effectiveness and viability, the GBCC is calling on BCC to undertake the following actions across each of the four pillars:

Reallocating Road Space:

- Conduct a full economic impact assessment of the number of businesses that are likely to be impacted by the measures focussing on reallocating road space (in particularly delivery of a bus and rapid sprint transit network on the A34 and A45) and working with other bodies (such as Highways England) to prioritise delivery and minimise disruption
- Consider the importance of reallocating time alongside reallocating road space – for example, working with schools and employers to re-examine start and finish times in a bid to lessen pressures on the network
- Commit to greater investment in electric vehicle charging infrastructure in order to increase the amount and reliability of EV charge points in the city

Transforming the City Centre

- Review the new Clean Air Zone start date (which is not expected to be launched earlier than January 2021) nearer the time to assess whether this is a feasible option given the fact that firms are still likely to be recovering from the repercussions of COVID-19
- Commit to offering a six month sunset period for employees of retail, hospitality and leisure firms based within the CAZ that were particularly affected by Coronavirus
- Explore expanding the mitigation measures for non-retail businesses that are either based in the Zone or travel into it on a daily basis that were also directly impacted by the fallout from COVID-19
- Commission formal research to monitor levels of Air Quality during the Coronavirus lockdown period to compare levels before and after the crisis in order to assess the correlation between lower levels of traffic and NO2 emissions
- Post COVID-19, partner with TfWM in order to support businesses in identifying which of their employees are able to work from home on a regular basis in a bid to reduce long term pressure on the transport network
- Provide transparency on which elements of employee data will be kept on file (and for how long) for those applying for exemptions and mitigations related to the Clean Air Zone
- Offer greater clarity on the working of the Cell Network (will it be enforced 24 hours a day? How will service engineers conduct emergency work?)
- Work with major hauliers, the RHA, BIFA and the FTA to create a clear plan on how movement of freight will be incorporated into the wider strategy

Promoting Active Travel in Neighbourhoods

- Producing and releasing accurate research on the impact that introducing 20mph speed limits in parts of the city has had on reducing road accidents and traffic flows
- Working with BIDs and other business groups to explore ways in which introducing Green Travel Districts can help stimulate demand on the high street in areas such as Perry Barr, Sutton Coldfield and East Birmingham
- Include more emphasis in the Plan on encouraging residents in local neighbourhoods to use e-bikes and e-scooters in order to boost levels of active travel

Managing Demand Through Parking Measures

- Confirm the parameters of the WPL regulation so businesses in the area can start making long term plans and adapt to changes
- Conduct an impact assessment on how many businesses in the proposed area are likely to be affected
- In the longer term, consider a package of incentives and mitigations for businesses that are likely to struggle with the added cost implications
- Better use of technology to allow employees/individuals to book parking spaces in advance, which in turn, would help reduce delays and traffic levels

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ⁱ HS2 – Our Story & Key Facts – December 2019: <https://assets.hs2.org.uk/wp-content/uploads/2019/08/14094931/our-story-and-key-facts.pdf>

ⁱⁱ Research undertaken in the GBCC Q1 Quarterly Business Report 2020 which is due to be formally released in mid April. Please on the link for more information: <https://www.greaterbirminghamchambers.com/research-campaigning/quarterly-business-report/>

ⁱⁱⁱ Jacobs Birmingham Clean Air Zone Feasibility Study – November 2018
[file:///fs01/home/rkandola/Downloads/E3_Distributional_Impact_Appraisal_Report_Rev_2.2%20\(6\).pdf](file:///fs01/home/rkandola/Downloads/E3_Distributional_Impact_Appraisal_Report_Rev_2.2%20(6).pdf)

^{iv} The Budget, March 2020 - <https://www.gov.uk/government/publications/budget-2020-documents/budget-2020>