

8th May 2020

Dear Sirs

East Birmingham Inclusive Growth Strategy

Birmingham Friends of the Earth welcomes the opportunity to comment on the above strategy. Our first observation is that the area covered by the strategy is very large. Is it too large to be manageable?

1. The Opportunity

We feel that too much reliance is placed on opportunities related to HS2 and Birmingham Airport. Following COVID-19, demand for long distance travel will be suppressed for many years, so less reliance should be placed on any positive economic spin-offs accruing from these pieces of infrastructure. Once construction of HS2 has been completed, we believe it will confer few if any economic benefits to East Birmingham.

East Birmingham's role in cutting carbon emissions to contribute to the city's aim of becoming carbon neutral should be central to all the opportunities identified.

The Tyseley Energy Park offers opportunities for clean energy, but we believe the major opportunity is to abolish the large incinerator which represents something of a dinosaur in the area. The system is very wasteful of resources, suppresses recycling rates and emits harmful gases. We believe it should be abolished at the earliest opportunity. With higher recycling rates there would be no justification for the incinerator.

We fail to see how the Commonwealth Games present such a significant opportunity for East Birmingham given the short duration of the event and the location for most of the events being in Perry Barr.

2. Vision

We support the overall vision on page 26.

Health and Well Being.

The link between the environment and health and well being should be made here. Air pollution is mentioned in the introduction about East Birmingham but we strongly believe it should be mentioned in this section.

The link between air pollution and serious health conditions such as heart disease, lung disease and even dementia is well established. It is also the cause of around 900 premature deaths per year in Birmingham. We are disappointed that this link between air pollution and health has not been mentioned here, given the illegal levels of air pollution present in parts of East Birmingham and the attention given to the city's planned Clean Air Zone. Birmingham City Council's Clean Air Strategy (2019) makes clear this link and provides more statistics and solutions to tackle the problems. The East Birmingham Inclusive Growth Strategy should be clearly aligned with the Clean Air Strategy.

Since over half of roadside air pollution is from cars, a significant reduction in car traffic will improve air quality and provide significant health benefits. Aircraft represent another more dispersed source of air pollution which is likely to affect areas of East Birmingham close to the airport and/or beneath the flight path. The impacts of air pollution are not spread equally across all sectors of society but in general are borne more heavily by those in economically less well-off areas, a number of which are to be found in East Birmingham.

There is also a link between mental and physical health and streets where walking and cycling is safe and pleasant. Conversely, environments with high levels of traffic noise and a poor street environment with intimidating fast traffic will deter walking and cycling which will have an adverse affect on health.

Default 20mph limits on residential roads and in local centres have been rolled out across large areas of Birmingham but have yet to be introduced in large areas of East Birmingham. This has important health benefits by reducing casualties on the roads especially to vulnerable road users, and making neighbourhoods more amenable to walking and cycling which produces health benefits.

The effect of aircraft noise on the health of those living in parts of East Birmingham should also be considered, particularly with respect to night flights which are taking off and landing at the airport late at night and well into the small hours.

The link between access to green space and recreation areas and physical and mental health should also be noted. Unfortunately such access is not equal across the whole of East Birmingham, as there are some areas which have relatively few parks and green spaces.

Affordable safe and connected places

One of these aims should specifically include making streets safer for all road users especially pedestrians and cyclists and reducing road casualties. As mentioned above this could be achieved by rolling out default 20mph to residential roads across the whole of East Birmingham.

The Environment

A major omission in this section is the need to reduce carbon emissions from transport and heating buildings. Consideration also needs to be given to making areas more resilient to the impacts of climate change such as increased risk of flooding produced by more intense rainfall events.

The objective to improve air quality does not seem to be very strong and should be explained more fully. Will it be continuous improvement, or will it be to reduce pollution to below legal limits in all areas? How will improvements in air quality be monitored? There are many locations in East Birmingham with poor air quality but no monitoring stations anywhere nearby, so it is not possible to know which areas to target and the scale of the problem.

We believe the objective to “increase the number of people using sustainable methods of transport” is too weak. Increasing use of sustainable transport could still be accompanied by increasing car use, given the planned growth in housing and population in the area. We suggest that the objective should be a substantial modal shift from private car use to walking, cycling and public transport. The objective should be not only to reduce the proportion of journeys undertaken by private car when compared to that undertaken by walking cycling and public transport but also to reduce the absolute number of private car journeys undertaken.

We are disappointed to see that there is no mention of waste management in the whole document. This issue is particularly pertinent to East Birmingham given that the major waste incinerator or 'energy from waste plant' is located in Tyseley. Burning of mixed refuse is an inefficient means of generating electricity and it suppresses the recycling rates in Birmingham making them the lowest in England. As such we believe the incinerator does not have a future. There is a huge opportunity to recover value by reuse and recycling which is currently being lost.

There is an urgent need for a waste strategy which does not include the incineration of most of Birmingham's waste. The East Birmingham Inclusive Growth strategy should at least consider the

implications of keeping the waste incinerator in operation and the lost opportunities it represents in terms of not recovering the value of waste materials by re-use and recycling.

3. Big Moves

Local services.

Access to good local services is important. Services should be readily accessible by public transport, cycling and walking, and be located in accessible locations.

The point is made that there should be continuing investment in buildings delivering public services such as schools. Such investment should aim to cut carbon emissions by the use of improved energy efficiency measures such as better insulation and the installation of renewable energy such as solar panels on roofs and heat pumps.

Multi-agency hubs located in locations easily accessible by walking, cycling and public transport will increase accessibility to services so we would support such a concept.

Management of land and buildings should also include measures to enhance local nature benefits such as planting trees on areas of soft landscaping and the installation of swift bricks in buildings.

Land which is dormant or under utilised could be opened up for use by the community for beneficial activities such as community orchards or urban food growing projects. Such projects promote community cohesion and can be used to address mental health and social isolation issues in communities.

Business employment and skills

Access to jobs and training opportunities will be made easier by low cost, reliable and frequent public transport, and safe cycling and walking routes. Segregated cycle routes will be required on busier and faster roads such as those leading to major employment sites such as Heartlands Hospital and JLR.

Support for growth of green technology and energy businesses based at Tyseley is mentioned, but we believe support should also be given for jobs in insulation, solar energy installation and green building technologies which have the potential to create a large number of jobs across the East Birmingham area.

Local Centres

We support this approach taken to strengthen local centres and improve parks and green spaces. In terms of local centres, car traffic should be reduced to improve air quality and access prioritised for walking, cycling and public transport. The hierarchy of that set out in the Birmingham Transport Plan

2020 should be adopted and Parking demand carefully managed to incentivise walking, cycling and public transport use and dis-incentivise car journeys. Road space reallocation to pedestrians, cyclists and public transport is another important measure to be considered for local centres, as this is a fundamental principle in the Birmingham Transport Plan. The street environment should be made safer and less intimidating for pedestrians and cyclists with 20mph speed limits, traffic calming and wider pavements which are now even more necessary to allow for social distancing.

There are many local centres in East Birmingham which have a poor environment for pedestrians with a plethora of pedestrian guard rails and poor crossing facilities. Take for example the local shopping centre at East Meadway near the junction of Kitts Green Road, where there is excessive use of pedestrian guard rails, even on side road junctions and no pedestrian phase on the traffic signals at the crossroads. This creates an intimidating and unpleasant environment for pedestrians and cyclists and the guard rails induce speeding.

Compare this with some other busy crossroad locations in other parts of Birmingham, for example the junction of Alcester Road with Wake Green Road in Moseley (the junction of an 'A' road with a 'B' road) has pedestrian phases on the traffic signals and there are no guard rails.

There are many more local centres in East Birmingham such as the example given above where poor infrastructure deters people from walking or cycling to local facilities.

We support the aim of encouraging local residents to use green space as part of an active lifestyle. To support this aim, all weather surfacing on selected paths passing through these areas is necessary to enable easier access for everyone including people with reduced mobility, wheelchair users and, where appropriate provide a route for cyclists.

We are encouraged to hear of the development of a 25 year plan for the natural environment in East Birmingham. We also welcome the fact that Washwood Heath Park is included in the Future Parks Accelerator Programme.

We would like to see the following prioritised as 'Big Moves':

One of the Big Moves should be to reduce the volume and proportion of journeys made by private car compared to those undertaken by walking, cycling and public transport and to reduce car dependency. This is essential if we are to reduce air pollution and carbon emissions and create a more pleasant environment in which to live and work. This can only be achieved by prioritising walking, cycling and public transport in policies and investment decisions.

While we strongly support the proposed rail improvements and Metro extension and agree they are essential and will make a significant contribution to reducing car journeys and achieving modal shift

away from private car use, in themselves, we believe that they are not fundamental Big Moves. Rather they represent some of the means of achieving the more fundamental Big Move of modal shift away from private car use to public transport, walking and cycling.

Given that Birmingham City Council has declared a climate emergency and aims to become carbon neutral by 2030, we believe that to support this aim one of the Big Moves should be to cut carbon emissions from all sectors.

We also believe that improving health and reducing health inequalities should be added as one of the Big Moves. Active travel and access to green space will make an important contribution towards this aim.

We support the other Big Moves listed.

4. Principles

Investing in the Environment

We welcome the recognition that the strategy should contribute to the city council's aim of becoming carbon neutral by 2030 and also improving air quality. It should also contribute to the goals set out in the city council's Clean Air Strategy.

Investing in the environment will also require investment in prioritising walking, cycling and public transport. Investment should also be made in improving green space and increasing tree cover. The latter will have an important role in absorbing carbon dioxide therefore supporting the city council's aim of becoming carbon neutral by 2030, and will mitigate air pollution as well as improving health and well being.

Joined up transport

Prioritising walking cycling and public transport should be the main focus of a joined up transport system in order to reduce private car traffic and reduce car dependency. Policies and investment decisions in the East Birmingham Inclusive Growth Strategy should all align with the Birmingham Transport Plan 2020.

Re-regulation of bus services will be essential for a truly joined up public transport system as this will enable integration of bus, rail and metro routes and timetables and make possible seamless low fare travel across all modes. The WMCA mayor should be lobbied to ensure re-regulation of bus services happens within the next mayoral term.

5. Next Steps

Highway improvements at Iron lane and the Bromford Gyratory are aimed at increasing traffic capacity. This will induce even more traffic, create more air pollution, boost carbon emissions and undermine active travel. These schemes are therefore in direct contradiction of Birmingham Connected (2014) and the 2020 Birmingham Transport Plan. They also fly in the face of the declaration of a Climate Emergency and will undermine the planned CAZ. As such these and similar planned schemes aimed at increasing highway capacity such as widening of the A45 for Sprint should be scrapped.

The HS2 road safety fund should be aimed at road safety not increasing highway capacity for even more traffic.

In the project / programme for climate change and green technologies, there is no mention of solar power or energy efficiency and insulation programmes. These are essential in delivering significant cuts in carbon emissions and in some cases relieving fuel poverty.

Martin Stride
Birmingham Friends of the Earth