



Manchester Friends of the Earth / Love Your Bike campaign
Green Fish Resource Centre
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3rd March 2011.

Manchester Friends of the Earth submission in response to the Local Transport Plan for Manchester consultation.

Dear Manchester City Council

Thank you for the opportunity to input into the Local Transport Plan for Manchester (LTPfM) consultation. The new Local Transport Plan needs to provide both a vision and policy framework for the transport network over the next 15-20 years. This period will see major economic, social, health and environmental challenges as well as the need to meet local, national and international obligations on climate change, air quality and resources.

We welcome Manchester's commitment to a wider vision for sustainable transport and our submission outlines a number of the key elements that we believe are essential for the development of the sustainable transport network needed for a modern, low-carbon city region in which residents can access the services they need.

We are disappointed that the LTPfM does not contain any specific details for Manchester's Local Implementation Plan (LIP). This is a key document for how Manchester will implement the policies contained in the Local Transport Plan and how it aims to meet the LTP3 objectives. In the absence of specific LIP details this response makes suggestions of policies and measures that Manchester Friends of the Earth would like to see included in the Local Implementation Plan.

We conclude by raising specific concerns regarding the potential impact of the lack of specific commitment and funding support within the Local Implementation Plan to active travel and smarter choices measures on the Greater Manchester bid for Local Sustainable Transport Funding.

Yours sincerely

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on behalf of Manchester Friends of the Earth

1) Introduction and Key objectives

“By 2020 the Greater Manchester City region will have pioneered a new model for sustainable economic growth based around a more connected, talented and greener City region where the prosperity secured is enjoyed by the many and not by the few”. (Greater Manchester Strategy, quoted in Local Transport Plan for Manchester, page 17).¹

Even though the Local Transport Plan for Manchester (LTPfM) highlights the need outlined in the Greater Manchester Strategy to pioneer a model of “sustainable economic growth” the LTPfM almost exclusively refers to “economic growth” throughout the consultation document.

Whilst, it is outside of the remit of the Local Implementation Plan, Manchester Friends of the Earth believes that there needs to be an assumption to move away from unrestricted economic growth and towards a more qualitative economic development that balances growth with environmental and social goals. To reflect this, we would recommend that each occurrence of the term ‘economic growth’, within the Local Implementation Plan, should be replaced with ‘sustainable economic development’.

Manchester Friends of the Earth believe that it is vital that Manchester’s Local Transport Plan and Local Implementation Plan prioritises sustainable travel. It should aim to make walking, cycling and public transport the primary means by which people get around the Manchester area. Such a plan would help meet the five key overarching challenges contained in the draft Greater Manchester Local Transport Plan (LTP3). These are to:

- ensure that the transport network supports the Greater Manchester economy to improve the life chances of residents and the success of business
- ensure that carbon emissions from transport are reduced in line with UK Government targets, to minimise the impact of climate change
- ensure that the transport system facilitates active, healthy lifestyles and provides equality of transport opportunities, and that its adverse health impacts are minimised
- ensure that the design and maintenance of the transport network and provision of services supports sustainable neighbourhoods and public spaces;
- maximise value for money in the provision and maintenance of transport infrastructure and services

Within the following sections, Manchester Friends of the Earth outline specific policy concerns and where possible suggest practical measures that offer value-for-money and cost-effective solutions to help meet one, or more of the overarching challenges.

¹ www.agma.gov.uk/about_agma/greater_manchester_strategy/greater_manchestrestre_strategy_final_draft

2) Key impact and effectiveness

Manchester Friends of the Earth would recommend that Manchester’s Local Implementation Plan should assess all its transport policies and delivery measures against the LTP3 ‘overarching challenges’.

For example, Trafford’s Local Implementation Plan² assessed its local delivery challenges against the LTP3 criteria (see Figure 3.2 below) and concluded that the measures to “increase levels of cycling and walking” had the highest level of “key” or “major” impact on the LTP3 overarching challenges out of all the local delivery challenges.

Figure 3.2: Relationship between overarching and local delivery challenges

Local Delivery Challenges ↓	Overarching Challenges for LTP3 →	Supporting economic growth and tackling deprivation	Delivering a low carbon economy	Protecting public health and safety	Supporting national transport and spending priorities
Tackle congestion on main roads and at key junctions		Key impact	Little impact	Major impact	Major impact
Reduce the number of people killed & injured on Trafford’s roads		Some impact	Little impact	Key impact	Major impact
Increase the capacity and enhance the quality of Metrolink services		Major impact	Major impact	Some impact	Major impact
Improve bus services and increase bus patronage		Major impact	Major impact	Some impact	Major impact
Make it easier for people to get to key services		Key impact	Major impact	Some impact	Major impact
Increase levels of walking and cycling		Major impact	Key impact	Key impact	Major impact
Improve local air quality and reduce harmful emissions from transport		Some impact	Key impact	Major impact	Major impact

Key:

-  = Local challenge key to delivery of overarching challenge
-  = Local challenge has major positive impact on delivery of overarching challenge
-  = Local challenge has some positive impact on delivery of overarching challenge
-  = Local challenge has little impact on delivery of overarching challenge

Manchester Friends of the Earth welcomes that the LTPfM:

“recognises the many benefits of promoting active travel and developing our transport systems and built environments to deliver positive outcomes for public health and wellbeing.” (Page 23)

We believe that a similar mapping exercise between challenges and LTP3 criteria could provide guidance for Manchester’s Local Implementation Plan.

² Transport in Trafford: A Local Area Implementation Plan. Draft for Consultation. January 2011. Page 28.

Recommendation:

- The Local Implementation Plan should provide a clear indication of the level of support and practical measures on Active Travel that Manchester City Council will provide to “increase levels of cycling and walking” in the Local Implementation Plan timeframe (2011-2015).

3) Carbon emissions from the Transport sector

Manchester Friends of the Earth welcomes the recognition in the Local Transport Plan for Manchester (LTPfM) that:

“The Council and its partners are also aware of our environmental responsibilities and the need to grow the City Centre in a manner that minimises the impact on local air quality and carbon emissions.” (Page 23)

and the ambitions outlined in the ‘Moving’ section of ‘Manchester: A Certain Future’ which states that:

“By 2020, around 15% of emissions reductions will have been made by cleaning up the way we move around, including the way we transport our goods and services. These cuts will come through a combination of incentives and enforcement. It will cost less to be clean and green while vehicles that emit high levels of carbon will come at a much higher price. (LTPfM, Page 33)

However, Manchester Friends of the Earth believes that the Local Implementation Plan (LIP) must outline specific measures and mechanisms to realise these ambitions. The LIP should also set clear carbon emission reduction targets for 2020 and beyond.

Technological changes, including transition to electric and hydrogen vehicles, cannot be expected to significantly cut emissions from cars until towards the end of the Local Transport Plan timeframe (at the earliest). Therefore policies and infrastructure that change travel behaviour should be a priority for the LTP in the short – medium term.

Recommendations:

- The Local Implementation Plan must aim to cut transport carbon emissions by at least 50% by 2026.

4) Active Travel (Walking and Cycling)

Manchester Friends of the Earth welcomes that the Local Transport Plan for Manchester (LTPfM) recognises:

“the many benefits of promoting active travel and developing our transport systems and built environments to deliver positive outcomes for public health and wellbeing.” (Page 23)

We also welcome that:

“Manchester’s cycle levels are the highest in Greater Manchester. Cycle journeys into the City Centre have doubled in the last 3 years and walking trips have increased by over 80%.”

However, as the LTPfM itself recognises, the:

“modal share of all journeys remains relatively low. To increase healthy lifestyle choices, we need to encourage more people to commute to work on bikes and on foot, where practical, as well as those other every day short distance journeys.” (Page 23)

Manchester Friends of the Earth believe that it is essential that Manchester City Council’s Local Implementation Plan identifies and supports specific active travel measures to help increase walking and cycling levels. A number of specific practical measures are outlined below.

4.1 Adult cycle training

Manchester Friends of the Earth welcomes the support that Manchester City Council provided in FY 2010/11 for Adult Cycle training for people who live, or work, in Manchester and recommend that the Local Implementation Plan supports such practical measures to assist and encourage people to start cycling.

“In 2010 the Council also offered free cycle training to adults either as residents of the city or working within the city boundaries. Once programme data has been analysed to quantify the effectiveness in encouraging more cycling journeys, particularly to employment locations, the Council will consider extending the programme of adult cycle training subject to funding being available.” (Page 96)

Cycle training for adults has been shown to be a very effective method for encouraging people to start cycling to work and for utility/leisure journeys.

Increasing cycling levels can also have direct economic benefits. In 2008, a Cycling England report "Valuing the Benefits of Cycling", prepared by SQW Consulting, highlighted that each new "additional cyclist" (generated *[by promoting and encouraging]* cycling) would deliver saving benefits of up to £382 in relation to health, pollution and congestion issues.³

³ www.dft.gov.uk/cyclingengland/site/wp-content/uploads/2008/08/valuing-the-benefits-of-cycling-exec-summary.pdf [Page 2 of Exec summary]. The research defines regular cycling as three times a week and measures the impact across the lifetime of a project – assumed in this study to be 30 years."

Therefore, according to the costing models in these reports - generating **50** additional, regular cyclists in Greater Manchester would generate up to £19,100 in health, congestion and pollution savings.

The SQW consultants also prepared the “Planning for Cycling” study for Cycling England which:

"presents for the first time a Cycling Planning Model (CPM) that will help local planners to better assess the number of additional cyclists required to generate a return on investment. The model shows how a surprisingly small number of additional cyclists will pay for investment in new cycling infrastructure. The model suggests:

- * An investment of £10,000 requires one additional regular cyclist
- * An investment of £100,000 requires 11 additional regular cyclists.”⁴

Therefore, according to the SQW costing models - generating **50** additional, regular cyclists in Manchester would justify over £454,000 of expenditure on cycling infrastructure and facilities, including up to £19,100 in health, congestion and pollution savings per annum.

There is also evidence that increasing levels of active travel (cycling and walking) can help people to be more productive at work as well as reducing employee sickness absence levels.

“There is increasing evidence to show that active people may be more productive at work and suffer less sickness. Employers therefore have much to gain from helping their staff to enjoy good health and a high quality of life by being physically active.” Sir Digby Jones, CBI Director-General⁵

A 2009 research report highlighted how employees from three large Dutch organizations who regularly cycled to work had significantly lower rates of absenteeism (average 7.4 days per year) than non-cyclists (average 8.7 days per year). There was also a relationship between cycling distance and frequency - the more often an employee cycled and the longer the distance travelled, the lower the rate of absenteeism. The report stated that:

“Employees who cycle regularly to work are less frequently ill, with on average more than one day per year less absenteeism than colleagues who do not cycle to work. If employers in the Netherlands were to encourage employees to cycle to work more, annual savings could reach 27 million euros.”^{6 7}

⁴ www.dft.gov.uk/cyclingengland/2009/05/new-economic-analysis-signals-a-more-effective-approach-to-cycling/

⁵ Quoted in “Active travel and healthy workplaces” (2005) www.sustrans.org.uk/assets/files/AT/Publications/Active%20travel%20and%20healthy%20workplaces%20final.pdf

⁶ Reduced sickness absence in regular commuter cyclists can save employers 27 million euros (2009) www.tno.nl/downloads/reduced_sickness_absence_kv1_1_09_02_978Em_laag.pdf

⁷ See also Hendriksen,IJ; Simons,M; Galindo Garre,F; Hildebrandt,VH (2010) The association between commuter cycling and sickness absence, Preventive Medicine, v51, no.2, pp132-135.

The literature on Cost Benefit Analysis of interventions to promote routine walking and cycling reveals that the economic justification for investments to facilitate cycling and walking had previously been under-rated. A 2010 review of the economic literature, prepared for Bristol City Council and NHS Bristol, reported that:

“Almost all of the studies identified (UK and beyond), report economic benefits of walking and cycling interventions which are highly significant, and these average 13:1. For UK interventions only the average figure is higher, at 19:1. Investment in infrastructure and to facilitate increased activity levels amongst local communities through cycling and walking is likely to be a ‘best buy’ for our health the NHS at large in terms of cost savings, as well as for the road transport sector.”⁸

Given the documented value-for-money and cost-effectiveness of practical measures to increase cycling levels, Manchester Friends of the Earth believes that the Local Implementation Plan should provide a clear commitment that Manchester Council will continue to support an adult cycle training scheme.

Recommendations:

- The Local Implementation Plan should include a clear commitment that, in addition to Bikeability cycle training for children, Manchester City Council will continue to support an adult cycle training scheme for adults who live or work in Manchester.

4.2 Bus Driver cycling awareness

In February 2010, Greater Manchester’s Love Your Bike campaign (part of Manchester FoE) invited those who cycle in the area to answer a short questionnaire on their experiences of sharing the roads with buses. This issue had previously been raised, both in more general surveys and in conversations with the public, as an issue that not only raises safety concerns for those who cycle, but also deters some people from cycling.

A survey was carried out using an Internet application and was promoted through cycling email lists, word of mouth, at the monthly Bike Friday rides and through the media⁹. In total 736 responses were received. Over 80% of the respondents cycled at least once a week in Greater Manchester. Just under half (46%) reported that they cycled every day.¹⁰

Amongst other questions, respondents were asked to select which 3 items from a list of 10 bus driver behaviours were most likely to make them feel unsafe when cycling. The list of driver behaviours had been drawn up by running short focus group sessions at meetings of Manchester FoE and Greater Manchester Cycling Campaign and asking for suggestions by email on various cycling-related email lists. The results show a clear ‘top 3’ bus driver behaviours that are of concern:

⁸ Value for Money: An Economic Assessment of Investment in Walking and Cycling, March 2010, Page 1.

⁹ ‘Love Bikes but Hate Buses?’ Manchester Evening News 4th March 2010.

¹⁰ A full copy of the Bicycle and Bus Driver survey report is available on the Love Your Bike website. www.loveyourbike.org

- 1) 'Passing too close to you' (76% of respondents selected this)
- 2) 'Pulling out from bus stops without looking and signalling' (60%)
- 3) 'Overtaking when not necessary (in busy traffic or approaching a bus stop)' (43%)
- 4) 'Blocking advanced stop lines / boxes at traffic lights' (30%)
- 5) 'Driving in cycle lanes' (17%)
- 6) 'Opening the doors and letting people off when bus is not at bus stop' (16%)
- 7) 'Break suddenly without warning' (11%)
'Driving too fast.' (11%)
- 8) 'Driving through red lights.' (7%)
- 9) 'Other' (6%)
- 10) 'Telling you that you should not be in road and should be on the cycle lane.' (5%)

The high number and content of the responses reinforces the anecdotal evidence obtained from speaking to people who already cycle and those that are 'maybe cyclists' that sharing the roads with buses raises concern for people who cycle in Greater Manchester. This issue needs to be taken onboard by those agencies and organisations seeking to increase levels of cycling within Greater Manchester.

Manchester Friends of the Earth recommends that Manchester City Council work with GMPTE to ensure that the franchise negotiations under the new Quality Bus Partnerships require bus operators to provide cyclist awareness training for all bus drivers.

Recommendations:

- The Local Implementation Plan recognise the need for cyclist awareness training for bus drivers and other large vehicle operators.

4.3) Walking

Manchester Friends of the Earth welcomes that between 2002 and 2010 the number of people walking into the City Centre increased by 82%. Unfortunately, it is also clear, as the LTPfM recognises, that:

"generally walking is probably in decline as more people are driving, for complex social and pragmatic reasons. We need to reverse this trend and encourage people to see the wider (sometimes less obvious) benefits of walking." (Page 67).

and that the:

"pedestrian experience can be an unpleasant one. The high volumes of motorised traffic, difficulty in crossing junctions/radial routes and the cluttered pavements add to the unattractiveness of walking on Oxford Road, in spite of which has very high pedestrian flows." (Page 43)

We note that the five-year strategy (in the GM Walking Strategy published in 2002) stated that LTP2 would:

- Seek to promote walking alongside the other sustainable transportation modes

- Adopt a hierarchy that first considers the needs of the pedestrian
- Emphasise the street as a space for living. Address urban planning, design and maintenance issues to ensure quality and security
- Change the image of walking in cities and towns
- Take into account emerging research and best practice guides and adjust action plans accordingly. (Page 16).¹¹

We welcome that during the revision of the UDP in 2010, Manchester City Council reaffirmed support for a road user hierarchy, first adopted in 1997, that should be used when assessing schemes and policies with significant transport implications. Policy T3.9 states that transport schemes and policies should accord the following priorities:

- pedestrians and disabled people
- cyclists
- public transport
- access (commercial and business)
- general traffic (off peak) and
- general traffic (peak).^{12 13}

We would encourage Manchester City Council to promote a common road user hierarchy across the whole of Greater Manchester.

Streets and public spaces are most successful when residents have the opportunity to influence decisions about them and we would encourage the Local Implementation Plan to include funding for Community Street Audits to help communities identify the necessary interventions to help create a safe, attractive and enjoyable environment.¹⁴

We would also encourage the Local Implementation Plan to consider improving pedestrian access with innovative schemes such as the diagonal crossings introduced in Oxford Circus, London.¹⁵ (See photo below)



“Diagonal” street crossing, Oxford Circus, London).

¹¹ www.gmltp.co.uk/pdfs/GM_walking_strategy.pdf

¹² www.gmltp.co.uk/pdfs/ProvGMLTP/annex3_12.pdf

¹³ See www.manchester.gov.uk/download/14335/unitary_development_plan_udp_complete_text-sept_2010

¹⁴ www.livingstreets.org.uk/index.php/expert-help/community-street-audits/

¹⁵ www.bbc.co.uk/london/content/articles/2009/04/14/oxford_circus_feature.shtml

Recommendations:

- The Local Implementation Plan should promote a common road user hierarchy across the whole of Greater Manchester.
- The Local Implementation Plan should recommend the implementation of Community Street Audits to identify improvements needed to the pedestrian environment.

5) Smarter Choices

Manchester Friends of the Earth welcomes the vision contained in the Local Transport Plan for Manchester (LTPfM) that:

“Smarter choices will be easier to make. Cycle and pedestrian routes will cross the city region, making it easy to get around without cars. Our workplaces will encourage cycling and walking to work with storage, changing facilities and bike rental schemes. We will share our cars and work from home to help reduce the number of vehicles on the road.” (Page 33).

However, we are dismayed that the LTPfM considers that:

“Smarter Choices are at risk of severe reductions in funding during the current period of austerity. This is because their nature of being easily scalable makes them easy to cut as compared to large infrastructure which requires long-term funding. This is despite the better value-for-money return often provided by smarter choices options.” (Page 74)

Since the publication of LTP2, the positive evidence base and support for Smarter Travel Choices (STC) policies has significantly increased. The results from the three successful DfT sustainable travel towns pilots have been published.¹⁶ A similar successful trial which took place in the London Borough of Sutton has also been concluded.¹⁷

The evidence from these pilots shows that even isolated pilot schemes offer an exceptional value for money¹⁸ way to cut single occupancy car journeys and car traffic generally, with the following “spin off” benefits:

- Cut traffic congestion
- Reductions in carbon emissions
- Health benefits through increases in active travel
- Reduction in local pollution
- Safer, more pleasant neighbourhoods

Smarter Travel Choices packages have significant high profile backing from all main political parties, Health bodies, the King Report on Low Carbon Cars and the Committee on Climate Change.¹⁹

¹⁶ www.dft.gov.uk/pgr/sustainable/smarterchoices/smarterchoiceprogrammes/

¹⁷ www.smartertravelsutton.org/about/privacy

¹⁸ Benefit Cost Ratio for congestion benefits alone = 4.5 (DfT results of sustainable travel towns pilots): www.dft.gov.uk/pgr/sustainable/smarterchoices/smarterchoiceprogrammes/pdf/summaryreport.pdf

¹⁹ see FOE Smarter Travel Choices briefing for more info: www.foe.co.uk/resource/briefings/ltp_stc_briefing.pdf

In September 2010, transport secretary Phillip Hammond said: *“For short-distance urban travel, our challenge is to make public transport or low-impact modes such as walking and cycling the most attractive options”*²⁰.

Manchester Friends of the Earth believes that it is very likely that a Greater Manchester wide Smarter Choices programme would be significantly more successful than the DfT travel town pilots at achieving modal shift due to the benefits of synergy from neighbouring schemes. However, this will require both political and financial support from all local authorities and at a GMITA/TfGM level.

Recommendations:

- The Local Implementation Plan should seek to enhance and “lock in” the benefits of the Smarter Choices programme with the following recommended complimentary measures:
 - Extensive conurbation wide cycle network.
 - 20mph limits in all residential areas (see also section 7.2)
 - Multiple occupancy vehicle lanes on key commuting routes.

6) Public transport

Manchester Friends of the Earth recognise that Manchester City Council's powers in relation to the provision of the public transport network are limited.

In terms of public transport, Greater Manchester faces particular challenges. The area is served by 44 bus operators, over which the Integrated Transport Authority (GMITA) has little real control. The 2008 Local Transport Act has afforded some powers to Local Authorities, but public transport provision remains deregulated.

This situation not only makes integration hard to achieve, but also makes route planning and environmental regulation difficult. Current and potential users, are presented with a sometimes baffling array of ticket types and prices, sources of information and levels of performance, making journeys that involve more than one operator confusing and potentially more expensive. Although there have been some recent positive developments, such as hybrid buses on the 147²¹ and 42 routes²² and the city centre metro shuttles²³ and new trams, many of the vehicles are old and of poor standard.

However, Manchester's public transport network, which includes buses, trains and Metrolink, has the potential to offer low-carbon and socially inclusive alternatives to the private car for many journeys and therefore to both reduce climate change emissions and foster sustainable neighbourhoods. Spatial planning and public transport can together promote strong town and district centres.

²⁰ Sustainable Transport Speech 10th Sept 2010:

www.dft.gov.uk/press/speechesstatements/speeches/hammond20100910

²¹ www.staffnet.manchester.ac.uk/news/archive/list/display/?id=5681&year=2010&month=04

²² <http://tangerine-pr-agency-manchester.blogspot.com/2010/10/stagecoach-manchester-invests-over-5m.html>

²³ <http://kn.theiet.org/news/may10/manchester-hybrid-buses.cfm>

Overall, 47.8% of Manchester households do not own a car²⁴. This figure varies greatly between ward areas. Improving and developing the public transport network must be a key objective for increasing access to jobs for Manchester households who do not access to a car.

The 2003 Social Inclusion Unit report 'Making the Connections: Social Inclusion and Transport' gave evidence for the ways in which limited public transport and low car ownership combine to make access to services, including employment, difficult. Good public transport can therefore aid economic development, especially in areas with low car ownership.

It is also important that as recognised in the draft Local Transport Plan (para 4.2.2.8), road space should be reallocated to give greater priority to public transport, as well as walking and cycling. This approach should include not only the creation of bus and cycle lanes, but also ensuring that they are well maintained and fully enforced. If bus and cycle lanes are filled with parked vehicles, their value is very limited. If bus lanes are clear and continuous, they can greatly aid reliability and help to make bus travel a more attractive mode.

Manchester Friends of the Earth welcomes the commitment in the LTPfM to:

“gain the maximum benefit from the bus priority measures included in the schemes, we also need better enforcement of the bus lanes. Manchester is the leading authority outside of London for enforcement of bus lanes and has invested in technology to monitor bus lanes and enforce contraventions. The Council will continue to work with TfGM to undertake enforcement on the network of bus lanes in Manchester and will pursue new powers to enforce moving traffic offences, such as at box junctions.” (3.1.2 Enforcement of Parking Restriction and Bus Lanes, Page 79)

Park and Ride facilities can be useful, helping to reduce the number of cars coming in on arterial routes. These should be integrated with existing facilities including rail, Metrolink and bus nodes and there are opportunities to link these with cycling facilities – for example, providing bike hire, bike parking or cycle centres at these sites. York, for example, allow cyclists to park for free and then take the bus²⁵, and Nottingham City Council have provided reduced price parking spaces for those would like to park their car and cycle the rest of the journey.²⁶

The Local Implementation Plan must recognise the need for transport and planning issues to be considered together. Modal shift can be encouraged by requiring new developments to be sited near public transport nodes. However, the plan should also recognise that where new developments take place at points where public transport is poor, then investments should be made to develop links to the site, and connect these to existing networks, not only for public transport but also for walking and cycling.

Recommendations:

- The Local Implementation Plan should encourage the reallocation of road space to create bus priority routes and require that they be effectively enforced.

²⁴ See Keyfacts 12: Vehicle Ownership in Manchester 2001 (new wards)

²⁵ www.york.gov.uk/parking/ride/

²⁶ www.nottinghamcity.gov.uk/index.aspx?articleid=10249

- The Local Implementation Plan should support the need for Manchester City Council to work proactively with bus operators to improve services and encourage the use of quality contracts and partnerships.
- The Local Implementation Plan should require proactive work to reduce air pollution from all vehicles, especially buses and HGVs.

7) Public health

Manchester Friends of the Earth welcomes the recognition in the Local Transport Plan for Manchester (LTPfM) that:

“The role of transport is around improving physical activity levels through encouraging more active travel choices; minimising air pollution and road casualties and improving the overall quality and performance of our transport networks to reduce journey delays and make the experience safe, secure and more pleasant. Managing the impact of traffic and parking on our communities is also a major influence on improving the quality of life for our residents.” (Page 23)

However, it is also important that the Local Implementation Plan contain policy measures to tackle the negative health impacts associated with the transport sector.

7.1) Air Quality in Manchester

Manchester Friends of the Earth notes the findings from a Defra report which highlighted that:

“Road transport is the largest single source of air pollution, accounting for 33% of emissions in the case of NO_x and 21% in the case of PM₁₀. Transport is identified as the main source of pollution in 92% of all AQMAs.”²⁷

We therefore welcome the acknowledgement in the Local Transport Plan for Manchester (LTPfM) that:

“Reversing the domination of the car on public space will also improve safety and air quality and give physical environments a better sense of place.” (Page 11)

and that the LTPfM recognises that the:

“main source of poor air quality in the City Centre is transport related, with 52 per cent of total emissions of NO₂ coming from traffic. In order to improve air quality for the benefit of residents, workers and visitors, we will need to tackle the growth in road traffic and congestion but also ensure that the increase in public transport capacity is delivered in a cleaner and greener way, and walking and cycling journeys are supported by a range of policies and investments.” (Page 23).

It is important to acknowledge the negative impact that older and lower quality buses can have on air quality and this has been recognised in the LTPfM which states that:

²⁷ www.defra.gov.uk/environment/quality/air/airquality/local/documents/laqm-report.pdf

“Oxford Road serves as a major radial route and public transport corridor for buses, which brings many economic benefits but also impacts on the amenity of the area such as from congestion, noise and air pollution. The air quality monitoring station on Oxford Road indicates that the ground level concentrations of NO₂ have not been going down at roadside in spite of overall trend of improving air Quality across Manchester. “ (Page 43)

and also that the:

“high levels of bus activity and periodic bus-on-bus congestion contributes to poorer air quality and noise pollution in some areas of the City Centre. This is becoming an issue in areas including The Corridor (Oxford Road), Portland Street, Lever Street, Oldham Street and Church Street. This congestion impacts on bus journey times and creates conflicts between buses, pedestrians, cars and local residents.” (Page 61)

We would recommend that the LTPfM specifically references the need for Manchester to meet European Union air quality targets. Since 1999, the United Kingdom has been required to meet targets for nitrogen dioxide (NO₂) emissions. These targets were introduced by the European Union and were supposed to have been met by 1 January 2010²⁸ but the United Kingdom negotiated an extension until January 2015.²⁹

Whilst we welcome the statement in the LTPfM that:

“encouraging modes of transport that are carbon free or that produce significantly lower carbon emissions will help in halting climate change and improving air quality.” (Page 32)

We would expect to see more detailed policy commitments on how Manchester will meet the EU air quality targets due to come into force by 2015.

7.2 Strengthening local communities – reducing social exclusion.

Research conducted by Sustrans has shown that less busy roads increase rates of neighbourliness with more children playing outside and communities interacting more positively with each other.³⁰ Research in Bristol found a dramatic deterioration in the social life of streets with increased heavy motor vehicle traffic, with the average resident on a busy street found to have *less than one quarter* the number of local friends compared with those living on a similar street with little traffic.³¹

A reduction in speed limits in residential areas would also directly address three of the five key priorities for LTP3: namely tackling climate change; improving safety, security and health; and improving quality of life.

²⁸ www.uk-legislation.hmso.gov.uk/si/si2007/uksi_20070064_en_6#sch1-pt1 Nitrogen dioxide (NO₂). Annual limit value for the protection of human health

²⁹ Article 22(3) states ‘Where a Member State applies [the time extension provisions], it shall ensure the limit value for each pollutant is not exceeded by more than the maximum margin of tolerance specified in Annex XI for each of the pollutants concerned.’ Please see: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:152:0001:0044:EN:PDF>

³⁰ www.quality-streets.org.uk/index.php?id=5

³¹ www.streets-ahead.org/Presentations/DTESummary.pdf

Many cities and towns across the UK have already successfully implemented a 20 mph speed limit into their communities with minimal need for capital expenditure. There are many examples of good practice available, from which Greater Manchester could learn.³² In addition, this approach is supported by Sustrans in their 'Quality Streets' campaign.³³

7.3 Speed reduction on residential roads. 20mph area wide speed limits.

Manchester Friends of the Earth notes the LTPfM states that:

"The City also aspires to deliver a 20mph programme of schemes around every Manchester school, to calm vehicles speeds, whilst addressing other parking and highway problems where funding is available. Implemented along side school travel plans, the journey to schools will be targeted for encouraging journeys on foot, bike or bus." (Page 93)

However, we would argue that Manchester City Council work with local communities to deliver area-wide 20mph speed limits in residential areas.

Research published on 24th January, by the North West Public Health Observatory, not only documented the shocking number of road traffic casualties in the North West, but also highlighted how there was compelling evidence that introducing 20mph speed limits in residential areas would save lives and reduce injuries. The research found that introducing 20mph speed limits could reduce the number of pedestrians of all ages killed or seriously injured by 26% and the number of cyclists of all ages killed or seriously injured by 14%.³⁴

Evidence from Portsmouth has shown that introducing 20mph speed limits is a cost-effective way to reduce traffic speeds³⁵ and the British Social Attitudes Survey has suggested that nearly three quarters of people support 20mph speed restrictions in residential areas, including 72% of drivers questioned.³⁶ Community-wide 20mph limits also provide better value for money than 20mph zones³⁷ as the Department for Transport Guidelines (1/06) has relaxed requirements for 20 mph limits in residential areas. There is no longer a mandatory requirement for 20mph speed limit schemes to impose physical measures such as traffic bumps or chicanes. Without the major cost of highway engineering - Portsmouth's 20 mph limit cost just £333 per street.

Manchester Friends of the Earth is calling on both Manchester City Council and the Greater Manchester Integrated Transport Authority (GMITA) to introduce a policy of 20mph speed limits for residential areas in the Local Transport Plan (LTP3) and Local

³² www.20splentyforus.org.uk

³³ www.quality-streets.org.uk/index.php?id=5

³⁴ Page 89, "Road traffic collisions and casualties in the North West of England" published on 24th January 2011. See www.nwpho.org.uk/RTCs_NW/

³⁵ See Interim Evaluation of the Implementation of 20 mph Speed Limits in Portsmouth, Final Report - September 2010
www.dft.gov.uk/pgr/roadsafety/speedmanagement/20mphPortsmouth/pdf/20mphzoneresearch.pdf

³⁶ www.amazon.co.uk/British-Social-Attitudes-Report-Survey/dp/0761942793#reader_0761942793

³⁷ See www.20splentyforus.org.uk/BriefingSheets/20mphLimits_7_times_more_cost_effective_than_20mph_zones.pdf

Implementation Plan, respectively to reduce traffic speeds and help encourage more people to start cycling.

Recommendations:

- The Local Implementation Plan should introduce 20mph speed limits for residential areas to help create safer and healthier communities.

8) Traffic and Highways

8.1) Parking

Manchester Friends of the Earth welcomes that the Local Transport Plan for Manchester (LTPfM) recognises that:

“Managing the impact of traffic and parking on our communities is also a major influence on improving the quality of life for our residents.” (Page 23)

However, we are disappointed to note that the LTPfM contains very few policy measures relating to parking enforcement especially to pavement parking.

8.2) Cycle Parking Standards and Planning Guidance

The importance of providing sufficient cycle facilities, such as cycle parking, was highlighted by a 1994 study in Bradford, West Yorkshire, which undertook a large scale survey of current and potential cyclists to review the cycle facility provision and also to investigate the factors affecting the propensity to cycle. The provision of secure cycle parking was listed as an incentive that would increase their “likelihood to cycle” by 63% of the respondents.³⁸

In October 2009, Greater Manchester Police (GMP) released their Cycle Parking Design Guidance (Design for Security). This guidance was based on York Council's 'level of parking' requirements and in the "What are Cycle Parking Standards?" section the GMP state that:

"These are generally acknowledged by Local Authorities as providing 'best practice'. These standards should be applied to all planning applications by Local Authorities." (emphasis added).

Unfortunately, the current Greater Manchester Parking Standards as listed in the 2006 Local Transport Plan (LTP2) Technical Guidance requires planning departments to specify far less cycle parking provision when considering planning applications for new developments or re-developments.

An example, is that for office building type developments (Type A2: Financial & professional services) the current GM requirement is a "Minimum standard for cycle parking provision" of 1 cycle parking space per 400 square metres (minimum of 2).

³⁸ Hopkinson,P; Wardman,M (1996) Evaluating the demand for new cycle facilities, Transport Policy, v3, no. 4, pp241-249

Compare this to the requirement adopted by York City Council that demands all plans for new office buildings provide 1 space per 55 square metres. This means that any new buildings in York are required to provide 7 times more cycle parking space than an equivalent office building in Greater Manchester.

Also it is not clear whether the Greater Manchester guidelines actually have any “teeth” for enforcement purposes. According to a Greater Manchester Local Transport Plan Cycling Group report in April 2002 the “notes give advice regarding design and numbers of places, and whilst they cannot be enforced yet, form a suitable basis on which to implement facilities.”³⁹

Other cities, such as Cambridge, have already adopted cycle parking standards that require higher levels of cycle parking provision. For example: Financial and professional services 1 space per 30 m² GFA to include some visitor parking.⁴⁰ Manchester City Council has already requested its Planning Department to adopt the cycle parking requirements as included in Appendix 1: Cycle Parking Standards of the Greater Manchester Police Cycle Parking Design Guidance (Design for Security).⁴¹

Manchester Friends of the Earth welcomes the commitment from Manchester City Council to adopt the Greater Manchester Police Cycle Parking Design Guidance (Design for Security) standards and would urge Manchester City Council to encourage all GM local authorities to do likewise.

Recommendations:

- The Local Implementation Plan should promote cycle parking standards that will provide additional cycle parking throughout Manchester, in line with targets to increase cycling. Cycle parking is needed not only in the public realm but also in business and residential buildings, and Council planning policy should reflect this. Cycling parking provision should be tailored to fit the requirements of specific locations.

8.3) Cycle lanes and enforcement measures

Incursions by motor vehicles into cycle lanes and onto footpaths are a major cause of concern, and are a barrier to encouraging people to travel by these modes. Unfortunately, such behaviour has become such a regular occurrence that they are more the norm than the exception.

Inconsiderate/illegal parking/loading inhibits movement and access for pedestrians and cyclists; it causes damage to footpaths and kerbs, increasing the risk of trips and falls. It also increases maintenance costs.

Manchester Friends of the Earth welcomes the commitments in the LTPfM that Manchester City Council will:

³⁹ Greater Manchester Cycle Parking Guidelines, www.gmltp.co.uk/pdfs/cycle_parking.pdf

⁴⁰ See www.cambridge.gov.uk/public/docs/Car-and-Cycle-Parking-Standards.pdf

⁴¹

http://designforsecurity.org/uploads/files/DFS_Cycles.pdf?phpMyAdmin=jpYC7XVwydfllujo32uKtoQDa%2Cqf

“increase and improve the provision of secure cycle parking at key locations, such as rail stations and bus interchanges. The Council views the provision of adequate and safe cycle parking as a key factor in helping change travel behaviour. As a key part of the GMTF, bus improvement works include provision for the extension of many cycle lanes in the City Centre. This work also includes provision for cycle parking at key destinations along the routes.” (Page 94)

Unfortunately, the LTPfM does not appear to make specific reference to the enforcement of parking restrictions or other measures to prevent vehicles from blocking or parking in cycle lanes.

Recommendations:

- The Local Implementation Plan should clearly identify enforcement policies to tackle inconsiderate/illegal parking with regard to cycling and walking infrastructure.

8.4) Traffic Reduction

Manchester Friends of the Earth recommends that the Local Implementation Plan should take account of the feedback from the Department for Transport (DfT) on previous Greater Manchester bids for the Cycling Demonstration City and Sustainable Travel City funding, which highlighted the need for policies that re-allocate more roadspace to encourage more people to use public transport and active travel modes (walking and cycling).

Manchester Friends of the Earth therefore welcomes the commitments in the LTPfM to:

“Reduce the need to travel through integrating transport with land-use planning, locating development in accessible locations.” (Page 108)

and that Manchester City Council will also:

“continue to identify opportunities to re-allocate road space to pedestrians and cyclists, through new development and the planning process or delivery of large scheme such as the Cross City Bus package, as funding and approvals are confirmed.” (Page 108)

Manchester Friends of the Earth believes that it is essential to integrate land use planning with transport policies to deliver sustainable travel options and encourage people to choose sustainable travel modes.

Recommendations:

- The Local Implementation Plan should include provision for re-allocating roadspace to encourage better public transport services and to encourage more people to walk or cycle.

8.5) Highway Maintenance and ‘Potholes’

Unfortunately, there is not a common policy across Greater Manchester for when a 'sharp edge trip' (or pothole) becomes 'actionable' e.g. meets the criteria to be repaired. One of the main criteria is the size of the 'sharp edge trip' - or in other words, how deep is the pothole. However, as the table below illustrates there are widely different criteria used across the Greater Manchester local authorities.

Pothole depth	Local Authority
50mm	Salford
40mm	Bolton, Bury, Oldham, Stockport, Tameside, Trafford
35mm	Rochdale
30mm	Manchester
25mm	Wigan

Basically a pothole in Manchester has to be 20% deeper than a Wigan pothole before being repaired.

Manchester Friends of the Earth believe that if one Greater Manchester Local Authority classes a pothole 25mm deep as 'actionable' (i.e. potentially dangerous) then all GM local authorities should operate to the same criteria.

Recommendations:

- Manchester City Council should work with the other Greater Manchester local authorities to establish common criteria for when ‘sharp edge trips’ (potholes) are actionable for repair.

9) Manchester City Council’s - commitment and funding for sustainable transport.

From the LTP3 submissions and Local Implementation Plans that Manchester Friends of the Earth have seen so far it would appear that many of the GM local authorities view the Local Sustainable Transport Fund (LSTF) as the route to fund active travel (walking and cycling) measures within their Local Authority area.

However, Manchester Friends of the Earth would like to highlight the fact that the Department for Transport’s (DfT) assessment criteria clearly identifies that they are expecting local authorities to make significant financial contributions themselves. As the criteria states:

"The Department wishes to see local commitment to the proposed package. All bids must therefore include a local financial contribution towards the overall costs of the measures put forward. Bids must identify whether the local contribution will come from Local Authority sources or external partners such as health authorities and the private sector, including transport operators. The greater the overall local contribution towards the costs

and the more the contribution is from the private sector and other external organisations, the more positively the bid will be considered in the assessment process." ⁴²

Manchester Friends of the Earth is very concerned that adopting a policy, of waiting to see if there is a successful LSTF bid before funding active travel measures will not meet the Department of Transport criteria for assessing LSTF bids.

For any Greater Manchester LSTF bid to be successful, it is essential that each Local Authority identifies, supports and funds specific active travel measures to help increase walking and cycling levels in Financial Year 2011/12 and beyond.

Recommendations:

- The Local Implementation Plan must clearly identify the active travel (walking and cycling), smarter choices and sustainable transport measures that Manchester City Council will be supporting and funding in the short term.

Manchester Friends of the Earth / Love Your Bike
2nd March 2011

⁴² www.dft.gov.uk/pgr/regional/transportfund/pdf/guidance.pdf Pages 13-17