



Manchester Friends of the Earth / Love Your Bike campaign
Green Fish Resource Centre
46-50 Oldham Street
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31st January 2011.

Dear Councillor Alan Mitchell,

Thank you for the opportunity to input into Trafford Council's draft Local Implementation Plan (LIP).

The introduction to the Local Implementation Plan states that the LIP "sets our long term vision and objectives for transport in Trafford, and how these support our wider vision for the Borough as set out in the Sustainable Community Strategy. It also provides a more detailed Implementation Plan for the short to medium term, which sets out a number of specific work areas and schemes which we see as priorities in the coming four year period to March 2015." (Page 3).

Manchester Friends of the Earth believes that transport policy cannot be viewed in isolation from the other major challenges that we face. Therefore both the new Local Transport Plan (LTP3) and Local Implementation Plan need to provide 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 therefore welcome Trafford'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 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

Pete Abel, Dr Graeme Sherriff and Catherine Thomson
on behalf of Manchester Friends of the Earth

1) Introduction and Key objectives

“To have a transport network which is the rival of any across the north west of England, provides all the connections that local people and businesses need, and supports economic growth and the delivery of a sustainable, low-carbon economy.” (Our Vision for Transport in Trafford, Local Implementation Plan, page 27).

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 ‘economic development’.

Manchester Friends of the Earth believe that it is vital that Trafford’s Local Implementation Plan¹ prioritises sustainable travel. It should aim to make walking, cycling and public transport the primary means by which people get around the Trafford 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
- To ensure that carbon emissions from transport are reduced in line with UK Government targets, to minimise the impact of climate change
- To minimise the adverse impact of transport on public health and on community safety
- To ensure that the design and maintenance of the transport network and provision of services supports sustainable neighbourhoods and public spaces; and
- To 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 Transport in Trafford: A Local Area Implementation Plan. Draft for Consultation. January 2011. Page 3.

2) Key impact and effectiveness

The draft Local Implementation Plan sets out seven key ‘Local transport delivery challenges for Trafford’ (Page 28):

- Tackle congestion on main roads and at key junctions;
- Reduce the number of people killed & injured on Trafford’s roads;
- Increase the capacity and enhance the quality of Metrolink services;
- Improve bus services and increase bus patronage;
- Make it easier for people to get to key services;
- Increase levels of walking and cycling; and
- Improve local air quality and reduce harmful emissions from transport

The draft LIP has assessed the relationship between these local delivery challenges and the LTP3 ‘overarching challenges’ (see Figure 3.2 below) and concluded that the “delivery of each one of our local challenges will have a positive impact on almost every one of the overarching 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

It can be seen from both Figure 3.2 above (from page 28 of the LIP) and the table below that the local delivery challenge to “increase levels of cycling and walking” has the highest level of “key” or “major” impact on the LTP3 overarching challenges out of all the local delivery challenges.

Relationship between overarching and local delivery challenges (derived from Figure 3.2)					
Local Delivery Challenges	Overarching Challenges for LTP3	Local Implementation Plan assessment of likely impact.			
		Key	Major	Some	Little
Tackle congestion on main roads and at key Junctions		1	2		1
Reduce the number of people killed & injured on Trafford's roads		1	1	1	1
Increase the capacity and enhance the quality of Metrolink services		-	3	1	-
Improve bus services and increase bus patronage		-	3	1	-
Make it easier for people to get to key services		1	2	1	-
Increase levels of walking and cycling		2	2	-	-
Improve local air quality and reduce harmful emissions from transport		1	2	1	-

Indeed, the Local Implementation Plan notes that:

“Active modes of travel, such as walking and cycling, are a key part of our strategy to support economic growth, promote the development of a low-carbon economy and protect and improve our residents’ health. Walking is the most important mode of travel at the local level, since virtually all journeys include some element of walking. Cycle also has significant potential to drive mode shift away from the private car, particularly for trips of less than 5km in length.” (*Increase levels of walking and cycling*, Page 32)

And the Trafford Vision 2021 policy document includes a Priority Outcome to see “More people using accessible public transport, walking and cycling.” (PE3).²

It is therefore disappointing to note that the sections on Active Travel and Smarter Choices both have the proviso “funding permitting”. The possible impact of this on the effectiveness of the Local Implementation Plan, the Local Transport Plan and any Greater Manchester bid for Local Sustainable Transport Funds is discussed in Section 9 of our response.

Recommendations:

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

² <http://traffordpartnership.org/documents/keydocuments/2021-blueprint.pdf> Trafford Vision 2021: a blueprint. Page 17

3) Carbon emissions from the Transport sector

Manchester Friends of the Earth welcomes the commitment in the Local Implementation Plan to:

“Take into account the needs of all road users and prioritise, wherever possible, low carbon modes of transport. (Overall Strategy, *Highway network and bus-based public transport*, page 34)

However, we would prefer this commitment to have a broader policy remit than simply within the section focussed on identifying and implementing schemes to improve the highway network.³

Manchester Friends of the Earth believes that the Local Implementation Plans must set clear carbon emission reduction targets for 2020 and beyond.

Technology will not 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 the commitment in the Local Implementation Plan that states:

“Active modes of travel, such as walking and cycling, are a key part of our strategy to support economic growth, promote the development of a low-carbon economy and protect and improve our residents’ health. Walking is the most important mode of travel at the local level, since virtually all journeys include some element of walking. Cycle also has significant potential to drive mode shift away from the private car, particularly for trips of less than 5km in length.” (*Increase levels of walking and cycling*, Page 32)

However, given Trafford’s topography, we would suggest that cycling can play a key role to drive modal shift for journeys of greater distance than 5km.

We also welcome the Local Implementation Plan commitment to:

- Major infrastructure schemes, such as the completion of the Bridgewater Way;
- Smaller infrastructure schemes aimed at plugging gaps in the network or improving conditions for walking and cycling on a localised basis;

³ “Within the constraints of available funding, the Council will therefore seek to identify and implement schemes to improve the highway network which will:” (Overall Strategy, *Highway network and bus-based public transport*, page 34)

- Specific interventions aimed at improving access to public transport by walking and cycling
- ‘Bikeability’ Cycle training for all Year 6 school children;
- Consideration of impacts on, and opportunities for, walking and cycling in every transport and highways scheme we introduce;
- Proactive revenue-funded work with local schools to promote walking and cycling;
- Consultation with local walkers and cyclists to understand their priorities;
- Close partnership working with the health sector to ensure we maximise value for money. This is particularly pertinent with the imminent transfer of responsibility for public health to local authorities; and
- Development of a strategic walking and cycling network in order to aid in prioritising interventions and maintenance activities.” [Page 36]

However, we are disappointed that these commitments are prefaced with the phrase “Funding permitting”. We believe it is essential that Trafford Council identifies and supports specific active travel measures to help increase walking and cycling levels. A specific practical measure is outlined below.

4.1 Adult cycle training

Manchester Friends of the Earth welcomes the commitment in the Local Implementation Plan to:

- Offer adult cycle training (Smarter Choices, page 38)

However, we are disappointed that this practical and cost-effective measure is within the “funding permitting” category.

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. In 2008/9 Transport for London (TfL) provided funding for 4000 adults across all London boroughs to receive cycle training. The comparable levels of adult cycle training, on a pro-rata population basis, for each of the GM local authorities and indicative costs are shown in the table below.

	Population	Pro rata No. of adult cycle training places	Indicative project cost (£)
Bolton	263700	140	6,979
Bury	180608	96	4,780
Manchester	464200	246	12,285
Oldham	103544	55	2,740
Rochdale	95796	51	2,535
Salford	219200	116	5,801
Stockport	284528	151	7,530
Tameside	214400	113	5,674
Trafford	211800	112	5,605
Wigan	81203	43	2,149
Total	2118979	1,122	56,081

Notes: These figures are based on adult cycle training costs of £50 per person/training session and do not include project management, promotion or evaluation costs.

To deliver comparable levels of adult cycle training, on a pro-rata population basis to London, a Trafford cycle training project would deliver cycle training for 112 adults.⁴ Providing cycle training sessions for this number of people would cost approximately £7000. To give an indication of the cost-effectiveness of such schemes at typical (2005) costs, this would be the equivalent of 175 metres of standard cycle lane.

Increasing cycling levels can 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.⁵

Therefore, according to the costing models in these reports - generating **20** additional, regular cyclists in Greater Manchester would generate up to £7640 in health, congestion and pollution savings.

The SQW consultants also prepared the Planning for Cycling study 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."⁶

Therefore, according to the SQW costing models - generating **20** additional, regular cyclists in Trafford would justify over £181,000 of expenditure on cycling infrastructure and facilities, including up to £7640 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-General⁷

⁴ London (population) (2007 figures) = 7,556,900. Trafford population (2008 figures) = 211,800
To match the London cycle training figures, pro rata (by population) Trafford would need to provide adult cycle training for 112 people.

⁵ 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."

⁶ www.dft.gov.uk/cyclingengland/2009/05/new-economic-analysis-signals-a-more-effective-approach-to-cycling/

⁷ Quoted in "Active travel and healthy workplaces" (2005)
www.sustrans.org.uk/assets/files/AT/Publications/Active%20travel%20and%20healthy%20workplaces%20final.pdf

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.”^{8 9}

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.”¹⁰

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 Trafford Council will introduce an adult cycle training scheme.

Recommendations:

- The Local Implementation Plan should include a clear commitment that, in addition to Bikeability cycle training for children, Trafford Council will introduce a cycle training scheme for adults who live or work in Trafford.

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.

⁸ 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

⁹ 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.

¹⁰ Value for Money: An Economic Assessment of Investment in Walking and Cycling, March 2010, Page 1.

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 media¹¹. 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.¹²

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:

- 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 Trafford 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 the recognition in the Local Implementation Plan that "Active modes of travel, such as walking and cycling, are a key part of our strategy to support economic growth, promote the development of a low-carbon

¹¹ 'Love Bikes but Hate Buses?' Manchester Evening News 4th March 2010.

¹² A full copy of the Bicycle and Bus Driver survey report is available on the Love Your Bike website. www.loveyourbike.org

economy and protect and improve our residents' health. Walking is the most important mode of travel at the local level, since virtually all journeys include some element of walking. (Active Travel, page 31)

We also welcome the commitments in the Active Travel and Smarter Choices to improve walking facilities and for measures to increase walking levels in Trafford. 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 (emphasis added)**
- 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).¹³

In 1997, Manchester City Council adopted a road user hierarchy that should be used when assessing schemes and policies with significant transport implications. The policy was updated during the revision of the UDP in 2010. 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).^{14 15}

We would encourage the proposed Local Implementation Plan to promote a common road user hierarchy in Trafford and 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.¹⁶

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.¹⁷ (See photo below)

¹³ www.gmltp.co.uk/pdfs/GM_walking_strategy.pdf

¹⁴ www.gmltp.co.uk/pdfs/ProvGMLTP/annex3_12.pdf

¹⁵ See www.manchester.gov.uk/download/14335/unitary_development_plan_udp_complete_text-sept_2010

¹⁶ www.livingstreets.org.uk/index.php/expert-help/community-street-audits/

¹⁷ www.bbc.co.uk/london/content/articles/2009/04/14/oxford_circus_feature.shtml



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

Recommendations:

- The Local Implementation Plan should promote a common road user hierarchy in Trafford and 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 commitment in the Local Implementation Plan which states that the:

“Council sees significant potential for the further development of Smarter Choices work within Trafford. However, the level to which we are able to achieve this is largely dependent on funding streams which are unknown at the time of writing. Funding permitting, we would like to:

- Build on our successful approach with schools in recent years to ensure that momentum is maintained on the sustainable travel agenda and that School Travel Plans are being actively implemented
- Implement further behavioural change initiatives in schools, particularly in relation to promoting walking and cycling
- Work with the health sector in promoting sustainable travel and behavioral change
- Develop a Smarter Choices programme for businesses in the Borough
- Offer adult cycle training.” **Smarter Choices** [Page 38]

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.¹⁸ A similar successful trial which took place in the London Borough of Sutton has also been concluded.¹⁹

¹⁸ www.dft.gov.uk/pgr/sustainable/smarterchoices/smarterchoiceprogrammes/

¹⁹ www.smartertravelsutton.org/about/privacy

The evidence from these pilots shows that even isolated pilot schemes offer an exceptional value for money²⁰ 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.²¹

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”*²².

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.

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 Trafford Council’s powers in relation to the provision of the public transport network are limited and welcome the fact that Trafford Council have “developed good working relationships in recent years with both GMPTC and bus operators in this regard.” (Page 14).

However, Trafford’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

²⁰ 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

²¹ see FOE Smarter Travel Choices briefing for more info: www.foe.co.uk/resource/briefings/ltp_stc_briefing.pdf

²² Sustainable Transport Speech 10th Sept 2010: www.dft.gov.uk/press/speechesstatements/speeches/hammond20100910

sustainable neighbourhoods. Spatial planning and public transport can together promote strong town and district centres.

Overall, 24.7% of Trafford households do not own a car. This figure varies greatly between ward areas – for example, over 45% of households in Clifford ward do not have access to a car. Improving and developing the public transport network must be a key objective for increasing access to jobs for Trafford households who do not access to a car. This is particularly important for wards, such as Old Trafford and Partington, which have high unemployment levels.

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.

We welcome the commitment in the Local Implementation Plan that Trafford Council “will need to continue to work with GMPTE and bus operators to identify how and where improvements and enhancements to existing services can be achieved, whilst ensuring continued provision for car drivers.” (page 14).

However, 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.

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 147²³ and 42 routes²⁴ and the city centre metro shuttles²⁵ and new trams, many of the vehicles are old and of poor standard.

Manchester Friends of the Earth welcomes the commitment in the Local Implementation Plan that Trafford Council “will continue to work closely with GMPTE, funding permitting, in order to deliver our key priorities in relation to Metrolink, which are:

- To address capacity issues and improve the quality of service on the Altrincham Metrolink line

²³ www.staffnet.manchester.ac.uk/news/archive/list/display/?id=5681&year=2010&month=04

²⁴ <http://tangerine-pr-agency-manchester.blogspot.com/2010/10/stagecoach-manchester-invests-over-5m.html>

²⁵ <http://kn.theiet.org/news/may10/manchester-hybrid-buses.cfm>

- To deliver a Metrolink extension to Trafford Park and the Trafford Centre
- To improve accessibility of Metrolink by walking and cycling
- Minimise disruption to local residents near Metrolink stops caused by informal park and ride activity.” (Funding permitting, Page 34)

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 bus²⁶, 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.²⁷

The Local Implementation Plan states that:

“Trafford Council regards transport and land use planning as a single, joined up entity: one cannot happen without the other. In line with national planning guidance, we consider that development should be prioritised in areas which are already well served by sustainable modes of transport, and which present opportunities to drive mode shift away from private car dependency.” (3.1 Transport and land-use use planning in Trafford, page 23)

The Local Implementation Plan also recognises 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.
- The Local Implementation Plan should support the need for Trafford Council to work proactively with bus operators to improve services and encourage the use of quality contracts.
- 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 Implementation Plan of the health benefits of increasing the levels of walking and cycling in Trafford. However, it is also important that the Local Implementation Plan contain policy measures to tackle the negative health impacts associated with the transport sector.

²⁶ www.york.gov.uk/parking/ride/

²⁷ www.nottinghamcity.gov.uk/index.aspx?articleid=10249

7.1) Air quality

The draft Local Implementation Plan recognises that:

“Road transport is the single biggest contributor to urban pollution and reduced air quality in the Borough. In order to reduce levels of pollutants, we will have a combined focus on encouraging modal shift to less polluting modes of transport, and on getting traffic flowing at key locations, especially where people live adjacent to busy roads.” (Improve local air quality and reduce harmful emissions from transport, Page 32)

Manchester Friends of the Earth believes that the evidence shows that air quality can be improved with a reduction in car speeds in residential areas. The Department for Transport’s guidance on setting local speed limits states that “(D)iving more slowly at a steady pace will save fuel and carbon dioxide emissions, unless an unnecessarily low gear is used”.²⁸ This guidance is also supported by advice from the London Assembly Transport Committee.²⁹ With improved air quality benefiting people’s health³⁰ and saving the English economy over 10 billion pounds per year,³¹ reducing the speed limit makes sense.

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.³² 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.³³

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.

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 practise available, from which Greater Manchester could learn.³⁴ In addition, this approach is supported by Sustrans in their ‘Quality Streets’ campaign.³⁵

²⁸ www.nao.org.uk/publications/0910/eac_briefing_-_air_quality.aspx

²⁹ <http://legacy.london.gov.uk/assembly/reports/transport/braking-point-20mph.pdf>

³⁰ www.nao.org.uk/publications/0910/eac_briefing_-_air_quality.aspx

³¹ The estimated costs of physical inactivity in England are £8.2 billion annually, which does not include the contribution of inactivity to obesity which in itself has been estimated at £2.5 billion annually. These figures include both the costs to the NHS and costs related to the economy, such as absence from work. Chief Medical Officer (2004). At least five a week: Evidence on the impact of physical activity and its relationship to health. London: Department of Health.

³² www.quality-streets.org.uk/index.php?id=5

³³ www.streets-ahead.org/Presentations/DTESummary.pdf

³⁴ www.20splentyforus.org.uk

³⁵ www.quality-streets.org.uk/index.php?id=5

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

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%.³⁶

Evidence from Portsmouth has shown that introducing 20mph speed limits is a cost-effective way to reduce traffic speeds³⁷ 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.³⁸ Community-wide 20mph limits also provide better value for money than 20mph zones³⁹ 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 Trafford 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 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 is disappointed to note that this section (page 37), with one of the longest lists of objectives, seems to be focussed almost exclusively on vehicle parking.

³⁶ 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/

³⁷ 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

³⁸ www.amazon.co.uk/British-Social-Attitudes-Report-Survey/dp/0761942793#reader_0761942793

³⁹ See www.20splentyforus.org.uk/BriefingSheets/20mphLimits_7_times_more_cost_effective_than_20mph_zones.pdf

Recommendations:

- The Local Implementation Plan parking section be amended to include more details of measures to improve and increase the provision of cycle parking infrastructure across Trafford.

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.⁴⁰

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).

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."⁴¹

Other cities, such as Cambridge, have already adopted cycle parking standards that require higher levels of cycle parking provision. For example: Financial and professional

⁴⁰ Hopkinson,P; Wardman,M (1996) Evaluating the demand for new cycle facilities, Transport Policy, v3, no. 4, pp241-249

⁴¹ Greater Manchester Cycle Parking Guidelines, www.gmltp.co.uk/pdfs/cycle_parking.pdf

services 1 space per 30 m2 GFA to include some visitor parking.⁴² 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).⁴³

Manchester Friends of the Earth would recommend that Trafford Council adopt the Greater Manchester Police Cycle Parking Design Guidance (Design for Security) standards and urge all GM local authorities to do likewise.

Recommendations:

- The Local Implementation Plan should promote cycle parking standards that will provide additional cycle parking throughout Trafford, 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 Local Implementation Plan:

- To improve parking enforcement activities with regard to promoting road safety at schools.
- To implement a footway parking publicity campaign with the aim of improving the use of Council footways with a planned enforcement routine.
- To identify areas of high enforcement levels and assess the parking restrictions in place with necessary publicity or restriction amendments to accommodate an improved level of compliance. (Parking, Page 37)

However, the Local Implementation Plan 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.

⁴² See www.cambridge.gov.uk/public/docs/Car-and-Cycle-Parking-Standards.pdf

⁴³

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

Recommendations:

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

8.4) Traffic Reduction

The Local Implementation Plan describes how Phase 1 of the Greater Manchester LDF Transport Modelling work provided a summary of the potential impacts on transport networks of the LDF Core Strategies for each of the districts in Greater Manchester.

The outputs of this study have been analysed and a number of 'concerns to be addressed' were outlined for Trafford. These included:

“growth in traffic and increase in journey times between Junction 5 and 11 of the M60; Carrington and the increase in traffic and journey times on the A6144 and the impact on Junction 8 of the M60; the increase of CO2 emissions; the increase in traffic and journey times on key public transport corridors; and the increase in overall car use and reduction in public transport use across the modelling period. “ (Strategic Locations, Page 24)

Manchester Friends of the Earth recommends that the Local Implementation Plan takes into account the feedback from the Department for Transport (DfT) on previous Greater Manchester bids for 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).

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'

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 Trafford has to be over 50% 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:

- Trafford 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) Trafford 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, including Trafford Council, view the Local Sustainable Transport Fund (LSTF) as the route to fund active travel (walking and cycling) measures within their local authority area.

For example, Trafford Council's Local Implementation Plan states that:

"Despite the very challenging nature of the current funding position for local transport authorities, there are some significant positive developments in relation to transport funding in recent months. Most particularly, the government's newly announced Local Sustainable Transport Fund (LSTF). This is a fund which is worth £560m nationally over the four year period to 2014/15. At the time of writing, full government guidance is still awaited regarding the nature of this fund and how local authorities will be able to access it. However, it is clear that it will focus on active travel and smarter choices interventions, and will be more than 50% revenue funding. **This will enable authorities a greater degree of flexibility in how it is spent, and most particularly will mean that it is able to fund non-infrastructure initiatives such as cycle training in schools.**" (Page 12). [Emphasis added]

and:

"In many cases, delivery of schemes, including some of the priority schemes highlighted in section 4.3, will require funding over and above that which we currently have access to. **In particular, our ambitions in relation to active travel and smarter choices will be heavily dependent on securing funds under the Local Sustainable Transport Fund. Without such funding, these work areas remain priorities but we will simply not be able to deliver our more ambitious plans through LTP funding alone.**" (Funding and Delivery, Page 45) [Emphasis added]

and:

"Subject to the availability of additional funds, particularly through the Local Sustainable Transport fund, we hope to prioritise the following elements in the period to 2014/15:

- Targeted interventions at schools with greatest potential to increase cycling and walking mode share, working in partnership as appropriate. For example this could include providing 'Bikelt' officers to work in schools in partnership with Sustrans and neighbouring authorities
- Free cycle training for adults
- Partnership working with the health sector, focusing on active travel opportunities for those whom they benefit most
- Travel planning initiatives with local schools and businesses to encourage modal shift
- Developing area-wide travel planning approaches." (Smarter Choices, Page 43).
[Emphasis added]

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." ⁴⁴

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 Trafford Council will be supporting and funding in the short term (Financial Year 2011/12).

Manchester Friends of the Earth / Love Your Bike
31st January 2011.

⁴⁴ www.dft.gov.uk/pgr/regional/transportfund/pdf/guidance.pdf Pages 13-17

List of recommendations (by section)

For ease of access we have compiled all the recommendations from the different sections of this submission. The recommendations are arranged under the relevant section headings.

2) Key impact and effectiveness

The Local Implementation Plan should provide a clear indication of the level of support and practical measures that Trafford 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

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

4.1) Adult cycle training

The Local Implementation Plan should include a clear commitment that, in addition to Bikeability cycle training for children, Trafford Council will introduce a cycle training scheme for adults who live or work in Trafford.

4.2) Bus Driver cycling awareness

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

4.3) Walking

The Local Implementation Plan should promote a common road user hierarchy in Trafford and 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

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

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

The Local Implementation Plan should support the need for Trafford Council to work proactively with bus operators to improve services and encourage the use of quality contracts.

The Local Implementation Plan should require proactive work to reduce air pollution from all vehicles, especially buses and HGVs.

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

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

8.1) Parking

The Local Implementation Plan parking section be amended to include more details of measures to improve and increase the provision of cycle parking infrastructure across Trafford.

8.2) Cycle Parking Standards and Planning Guidance

The Local Implementation Plan should promote cycle parking standards that will provide additional cycle parking throughout Trafford, 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

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

8.4) Traffic Reduction

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'

Trafford 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) Trafford Council's - commitment and funding for sustainable transport.

The Local Implementation Plan must clearly identify the active travel (walking and cycling), smarter choices and sustainable transport measures that Trafford Council will be supporting and funding in the short term (Financial Year 2011/12).