

# Consultation on Greater Manchester Transport Strategy 2040 – Our Vision



**friends of  
the earth  
Manchester**

## Response from Manchester Friends of the Earth

Thank you for the opportunity to comment on 'Greater Manchester Transport Strategy 2040 – Our Vision'. The following is the response of Manchester Friends of the Earth, a Greater Manchester-based environmental campaign organisation working on a range of issues that includes sustainable transport, aviation and climate change. Our cycling campaign 'Love Your Bike' is active at Greater Manchester-level and aims to promote cycling and help to make it an attractive, accessible and fun way to get around.

### 1 General Points

Manchester Friends of the Earth's vision for Greater Manchester transport system in 2040 is one in which there has been substantial modal shift away from the private car and towards public transport, walking and cycling. All vehicles have cleaner engines and the majority are electric. Transport provision is affordable and well integrated with easy-to-use journey planning tools and everyone has the services they need within easy access in their district centre so that there is less need to travel. As a result of these things the population has improved health thanks for active travel and clean air, the carbon footprint of the conurbation's transport is low, and the economy is thriving.

There is much in TfGM's 2040 Vision document that we welcome and find broadly compatible with our vision. The vision seems to reflect a good understanding that transport is not something that can be planned in isolation but that it is something that is bound up with the conurbation's economy and spatial planning and that it has a profound impact upon climate change, local air quality, health and social exclusion.

More specifically, we welcome:

- a) Acceptance that there is little scope for road building or widening in urban areas and that existing transport systems therefore need to be made more efficient.
- b) Recognition that the car is not an option for everyone, and that a socially inclusive transport system ensures that other modes are equally or better able to provide access to employment, healthcare and other services.
- c) Understanding the transport system as a potential enabler of improved health.
- d) Recognition of the importance of linking spatial planning and transport such that compact mixed-use developments can help reduce reliance on the car.
- e) Inclusion of climate change as a consideration for transport planning, both in terms of reducing emissions and building resilience to transport impacts.
- f) Ambition for Greater Manchester to be a world leader in technological innovation.

In developing a genuinely visionary strategy for Greater Manchester, we would build on these. A sustainable transport vision should not only constrain road building (a), it should also accept that

modal shift to walking, cycling and public transport will require space to be reallocated away from general traffic, whether that be to quality separated cycling space or bus priority corridors. The notion (b) that the car is not an option for everyone is too narrow: by 2040, living without a car should be an attractive option that is encouraged and facilitated through quality infrastructure for non-car travel and, for journeys where cars are required, affordable car clubs. A recognition of transport's role in climate change (e) is welcome, but what is needed is strong and ambitious targets for emissions reductions by 2040, and detailed design guidance to ensure that transport networks are resilient to climate impacts. We would also like to see Greater Manchester as a leader in sustainable transport, but such leadership in innovation need not be limited to the realm of technology (f); pursuing bold strategies to develop a dedicated network of cycle lanes are also innovative.

We welcome the inclusion of a maintenance and renewal strand in the vision (p40), as too often we have seen capital investment in infrastructure result in cycle routes with fading paint and potholed surfaces due to limited ongoing revenue.

The realisation of such a vision will require more than investment, service delivery and maintenance & renewal (as shown in the diagram on p40). Modal shift will require a 'hearts and minds' component that includes awareness campaigns, personalised journey planning and other information approaches.

It is also essential that key stakeholder groups are fully engaged in the development and implementation of this vision, including walking and cycling advocacy groups, public transport user groups and disability groups as well as communities and businesses more generally. In addition to the present outer suburban/rural Rail User Groups new consultative passenger groups for bus, urban rail and tram will be required to ensure comprehensive public involvement at both planning and implementation stages and beyond. We would therefore suggest that 'hearts and minds' and 'engagement' be added as additional components in the diagram on p40.

Whilst evidencing a good understanding of the challenges and presenting a broad understanding of how to bring about a shift towards a more sustainable system, the document lacks clear targets for what the area's transport will be like in 2040. The climate target, for example, on page 13 is simply a restatement of the already existing 2020 target. There is no evidence that TfGM have looked to other leading cities, in the UK and Europe, to find out what is possible and what they have learnt in developing their transport vision. In this sense, whilst the document represents a convincing consolidation of recent discussions on transport in Greater Manchester and some direction on 'where next', it cannot be said to be truly visionary. We would suggest a 2040 target of a 90% reduction in transport emissions on 2005 levels.

The remainder of this response addresses some particular aspects of sustainable transport: cycling, public transport, air quality, road safety, parking, and aviation.

## 2 Cycling

Cycling is an essential part of any transport vision. It is low carbon transport that promotes health and accessibility in a way that is socially inclusive. These advantages are recognised in this document and cycling has been rising up the agenda in Greater Manchester, but there is still along way to go to match the cycling levels of some other UK and Northern European cities.

It is important to have a realistic baseline, but the statement on page 5 of the 2040 vision document that 'Cycling is now established as an attractive option for commuters' is wrong and misleading. Whilst there have been improvements in infrastructure in recent years, cycling remains a relatively marginal activity and will continue to do so without continuous and strategic investment and political commitment.

A vision for cycling in 2040 should include:

- The integration of cycling and public transport, including plentiful and secure parking and public transport nodes and also carriage of bikes on public transport, including Metrolink.
- The development of plans for a strategic cycle network that both guide investment in infrastructure and also informs other development so that cycle routes can be planned and protected even when funding is yet to be secured. The network should reflect high standards of design to provide routes that are safe, coherent, direct, comfortable, attractive and future proof.
- A commitment to funding cycling on an ongoing basis, not limited by the availability of Government grants. We suggest this should be set at least £20 per person per year.
- Provision for cycle parking across the conurbation and cycle storage where people live. Space for cycle storage should be stipulated in new build design guidance and affordances should be made for storage solutions for older properties (e.g. on road cycle lockers).
- A public bike hire scheme akin to London's system that, amongst other advantages, enables commuters to use a bike for the 'last mile' of a public transport journey.
- Innovative ways of boosting cycling for technology, including advanced mapping systems and traffic control (e.g. lights that give cyclists priority at key junctions).
- Commitment to ongoing maintenance of all cycle routes, whether on or off-road. (The diagram on p40 seems to limit this to off-road cycle routes, when on-road infrastructure is as important in this respect.)

Our cycling manifesto 'Getting Moving' has 27 signatory organisations across Greater Manchester who also support the goal of getting cycling modal share to 20% of journeys under 5 miles by 2020. The document is attached to this response.

### 3 Public Transport

The vision refers to the dominance of the bus as part of the public transport system but notes that the area is limited by the current legislative framework that defines bus provision outside of London. We believe Greater Manchester deserves a core bus network with simplified fares and ticketing systems that is responsive to social priorities. The 2040 vision document makes reference (page 31) to the popularity of buses in London and we would agree that movement towards a franchising system operational in London is an essential part of a 2040 vision.

Affordability is a significant issue for the potential of public transport to be socially inclusive, yet it is absent from the 2040 vision document. Sustrans<sup>1</sup> found, for example, that over 1.5 million people living in England are 'at serious risk of being cut off from work and health care because of transport costs'. Those on low incomes are less likely to own a car and are therefore more reliant on public transport. The prioritising of 'value for money' for those who are able to pay is not a sufficient

---

<sup>1</sup> Sustrans (2012) Locked Out: Transport Poverty in England - <http://www.sustrans.org.uk/lockedout>

definition of affordability: the vision should specify the criteria for affordability and contain a commitment to ensure that public transport is accessible to those who most need it.

The introduction of Greater Manchester Peak fares has increased fares by typically 60% on journeys within the conurbation, and by over 100% on some journeys, even on lightly used trains running contra-peak flow, with implications for affordability for those relying on the rail network. This policy has reportedly led to overcrowding on the last pre-Peak trains, such as the Manchester Airport to Edinburgh, which has recorded the 2<sup>nd</sup> highest overcrowding in the country. As part of its concerns for affordability, these fares have no place in a 2040 vision that is just and inclusive.

Within this structure, a 2040 vision for bus travel in Greater Manchester should include:

- Provision of clear and accessible information about fare structures available before making a journey. TravelWatch North West have raised the issue that it is often impossible for users to get accurate fare information that enables them to make informed decisions based on the cost of bus journeys.
- Stipulations that ensure bus operators are using the cleanest vehicles engines in order to ensure the minimum impact of the conurbation's air quality.
- A fully integrated smart card system akin to London's Oyster, that is compatible with contactless payment cards as London's system now is.

#### 4 Air Quality

The 2040 vision document recognises that air quality is a serious issue for Greater Manchester, stating for example (page 13) that air pollution from particulate emissions is estimated to cause at least 1,000 early deaths annually. Poor air quality can affect health and quality of life and, by making the area less attractive for walking and cycling, also be to the detriment of other elements of the vision. The vision also recognises that road transport is 'having a seriously detrimental impact on air quality' and that NO<sub>2</sub> emissions in the conurbation need to be cut in order to meet EU limits.

It is difficult to separate concerns about air quality from the overall strategy, since policies that create modal shift away from single occupancy car use and towards active travel and public transport will reduce emissions. However, a 2040 Vision should include measures that specifically target air pollution, and these could include:

- A Low Emissions Zone that stipulates emissions standards for vehicles entering the area. Such a scheme should be carefully designed to ensure that benefits accrue not only to wealthier city centre areas but also to lower income neighbourhoods, which often bear the brunt of traffic pollution.
- Restrictions on public transport, public sector vehicles and licenced vehicles (e.g. taxis) that demand modern, low emissions engines.
- Provision of electric car charging points and support for electric & conventional car pool schemes.
- Actions to improve driving practice with the aim of both reducing vehicle emissions and improving road safety.
- Comprehensive and publicly available information on air quality, including the air quality data that is collected by local authorities.

- Prominent information and awareness campaigns on air quality, its health impacts and what travel choices can help to reduce it.
- Planning policies that avoid development that expose vulnerable populations to air quality, e.g. schools, nurseries, whilst also accepting that poor air quality is a health issue for everyone.

## 5 Road Safety

The 2040 Vision states that ‘we will work towards eradicating road deaths in Greater Manchester over the period to 2040, focusing on vulnerable road users’ (p8) and that “we must make neighbourhood and town centres pedestrian and cycle friendly, proving attractive ‘liveable streets’ with slower traffic speeds” (p38). These aims are summarised in the Specific Outcomes (p19) as “improved road safety”.

The document should both specify the targets which would satisfy the vague aim to “work towards” eradicating road deaths and the proven means by which road safety will be improved. Methods of achieving slower traffic speeds must likewise be detailed and proven effective by recent and authoritative research evidence.

## 6 Parking

The parking, on road and pavement, of private vehicles greatly restricts the flow of traffic and the safe movement of pedestrians, especially on the many older terraced streets across Greater Manchester. This inhibits the stated aim of creating “liveable streets” (p38). The greater use of alternative modes may reduce these problems at local facilities and in district centres, but will not alone improve conditions on residential streets. These problems need to be addressed and solutions identified relating to vehicle ownership in areas lacking dedicated parking facilities.

## 7 Aviation

The 2040 Vision states that “transport investment needs to support the airport’s ambition to grow from the current (2013) 20 million passengers to 55 million.” (p23).

However, the 2040 Vision provides no comment on the likely impact that a near three-fold increase in passenger numbers would have on Greater Manchester’s climate change and air quality obligations.

The Committee on Climate Change recently submitted evidence to the Airports Commission<sup>2</sup>. The Committee’s approach has been to assume that by 2050 CO<sub>2</sub> emissions from flights departing from the UK would be around the level that they were in 2005, namely 37.5 Mt (around 120% growth compared with 1990), and for other sectors of the economy to deliver 90% emissions cuts by 2050 compared to their 1990 levels in order to make up for the shortfall. Aviation – currently responsible for around 5% of UK CO<sub>2</sub> emissions – will be responsible for around a quarter of national CO<sub>2</sub> emissions by 2050 under this approach.

Since CO<sub>2</sub> emissions per air passenger are expected to decrease slightly over time due to technological and operational improvements in aviation, around a 60% growth in air passengers could be possible between 2005 and 2050 without increasing emissions, the Committee has calculated.

---

<sup>2</sup> <https://www.theccc.org.uk/wp-content/uploads/2015/02/CCC-AC-consultation-response.pdf>

Research from Aviation Environment Federation (AEF)<sup>3</sup> found that a new runway in the South East – wherever it is situated – would contribute an additional 8.2 Mt of carbon emissions, making meeting the 37.5 Mt target “effectively impossible”.

The study developed future scenarios of emissions based on aviation forecasts from the Department for Transport. It found that in order to build a new runway and still meet the 37.5 Mt target, **air travel at regional airports would need to be reduced.** (Emphasis added]

The 2040 Vision provides no analysis of the likely impact of an additional runway being built in the South East or of the likely introduction of carbon accounting or carbon budgets for all UK airports. Without such analysis it is difficult to understand how Manchester Airport will be able to achieve a near three-fold increase in passenger numbers.

---

<sup>3</sup> <http://www.aef.org.uk/uploads/WWF-regional-airports-report2.pdf>