

3rd November 2020

Manchester Friends of the Earth welcomes the opportunity to comment on the draft City Centre Transport Strategy.¹

Manchester Friends of the Earth is an award-winning environmental group, run by volunteers, creatively campaigning on local, national and international issues.²

Manchester Friends of the Earth's vision for Manchester's transport system 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 zero tailpipe emissions. 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.

In this vision, these changes have greatly increased the level of active travel and improved air quality across Manchester. This has seen improvements in the health and wellbeing of the people living and working in the region helping to reduce pressure on the health service. Better spatial planning, focused on improving access and opportunities across the region, has reduced the need to travel and has resulted in a low carbon footprint for the conurbation's transport system and a thriving economy.

The Manchester Climate Action Plan highlights that Greater Manchester needs to become carbon neutral by 2038 and that steep reductions in CO2 emissions are needed in the next 5 years.

Where possible our response has followed the ambitions, priorities and proposals structure of the draft City Centre Transport Strategy, namely:

- Ambition 1: Walking is the main way of getting around the city centre
- Ambition 2: The city centre is cleaner and less congested
- Ambition 3: More people choose to cycle to destinations within the city centre
- Ambition 4: The city centre benefits from better public transport connections
- Ambition 5: Parking in the city centre is smarter and integrated with other modes
- Ambition 6: Goods are moved and delivered sustainably and efficiently into and within the city centre
- Ambition 7: Innovation is embraced where it benefits the city centre and its users
- Delivery and Funding

For purposes of clarity we refer to the consultation document as the 'Transport Strategy' throughout this submission.

Manchester Friends of the Earth welcomes the broad vision and ambition identified in the Transport Strategy but believes that for Manchester to achieve its climate change, air quality and social justice ambitions we need faster and more radical changes to enable people to choose sustainable travel options.

We look forward to work with Manchester City Council to help achieve our vision.

Yours sincerely

Catherine Thomson, Manchester Friends of the Earth co-ordinator
Pete Abel, Manchester Friends of the Earth transport campaigner

Ambition 1: Walking is the main way of getting around the city centre

Manchester Friends of the Earth supports the priorities and proposed schemes outlined in the Transport Strategy.

We support the closure of Deansgate and Whitworth Street to vehicle traffic, with exceptions for e.g. deliveries at certain times and disabled access.

We support the proposal to “develop our city centre street network to be a fully 20mph area and remove through traffic, which we will facilitate with the development of loops into and out of the city from the Manchester Salford Inner Relief Route.”

We do not believe the projected target in the Transport Strategy for walking journeys are sufficiently ambitious for Manchester to meet its climate and air pollution obligations.

Ambition 2: The city centre is cleaner and less congested

Manchester Friends of the Earth welcomes the proposals outline in the Transport Strategy, namely:

- Reducing traffic levels in the city centre;
- Reducing the proportion of trips into the city centre made by car to less than 10% of the total morning peak hour trips;
- Reducing idling motor vehicles and minimising vehicle dwell time on city centre streets;
- Eliminating non-essential and polluting vehicles travelling into and through the core of the city centre; and
- Shifting towards low emission vehicle operation in our city centre.

Roads: Manchester Friends of the Earth welcomed the announcement in March 2018 by the Greater Manchester Mayor of the allocation of an initial £160 million for walking and cycling initiatives. However, at the same time a £400 million package was announced for new roads and road-widening schemes³ in Greater Manchester along with later announcements of multi-million pound road schemes – some to be funded from the national £27 billion Road Investment Strategy (RIS1 & 2) and others through Regional Growth Fund allocations.⁴

The Greater Manchester Transport Strategy 2040 highlighted that "simply increasing highway capacity to meet an ever growing demand for car travel is not sustainable or, indeed, physically or financially practical".⁵

And yet, Manchester and other Greater Manchester councils continue with new road building and road-widening schemes even though any increased network capacity is quickly filled. The Regent Road scheme provides a clear example with Transport for Greater Manchester reporting that:

"Some major schemes have also contributed to increasing the network capacity (Regent Road has given a 10-15% increase to capacity levels), **however as demand remains high this capacity had soon been filled.**"⁶

The concept of induced demand has been documented for over 60 years with Lewis Mumford observing in 1955 that "**adding highway lanes to deal with traffic congestion is like loosening your belt to cure obesity.**"⁷

Air Pollution: In Greater Manchester, road transport accounts for 75% of NO_x and 81% of Particulate matter emissions.⁸ With private cars typically representing more than 70% of the vehicle movements on most roads, and so the influence of cars is significant in most areas where high pollutant concentrations have been identified.⁹

The Transport Strategy indicates that "work will be undertaken to see whether it is feasible and practical to implement an Ultra Low Emission Zone (ULEZ) in the city centre at a future point." (p50). However, it does not indicate any timescale for this although one of the priorities identified is for: "Ensuring appropriate charging infrastructure for ultra-low emission vehicles."

Air pollution limits life expectancy, damages children's development and has been linked with dementia. Emergency admissions to hospital for asthma in Central Manchester and North Manchester NHS trusts are **double the national average**. It is estimated that air pollution costs Greater Manchester over £1 billion per year – this is approximately 20% of the GM Health & Social Care budget.¹⁰ And the most vulnerable people and those living in disadvantaged areas are at greater risk from air pollution.

Manchester Friends of the Earth believes that the Transport Strategy needs to commit to introducing an Ultra-low emission zone for the City Centre area.

Climate change emissions: In Greater Manchester, road transport accounts for 32% of CO2 emissions.¹¹

The Transport Strategy identifies that Greater Manchester has agreed a “13% year-on-year reduction in carbon emissions necessary to achieve zero carbon by 2038.”

Manchester Friends of the Earth believes that both the City Centre Transport Strategy and the Greater Manchester Transport Strategy 2040 need to urgently identify and implement transport interventions to rapidly reduce ‘carbon emissions’.

Recommendations summary:

The Transport Strategy and Greater Manchester Clean Air Plan should include an Ultra-low emission zone for the City Centre area.

Introduce a transport carbon budget, align all transport spending with this carbon budget and set a traffic reduction target to meet the carbon budget.

Re-allocate funding for new road building and road widening schemes to sustainable transport, walking and cycling schemes.

Ambition 3: More people choose to cycle to destinations within the city centre

Manchester Friends of the Earth fully supports the priorities and proposals for cycling as highlighted in the Transport Strategy.

We welcome the **development of an integrated city centre cycle network**, formed around “the triangle” cycle network, comprising three major routes: **Deansgate**, **Whitworth Street West** and the committed **Northern Quarter cycle route** – supported by a series of “spokes” on the “city centre wheel” cycle network, which will deliver quality radial routes for people travelling from across the city-region.

We fully support the proposal to conduct a city-wide cycle parking review, which will:

- Review the availability and distribution of both on and off-street public and residential cycle parking provision to ensure adequate provision, taking account of forecast demand increases;
- Assess requirements for public and residential cycle parking, including those that can accommodate cargo cycles and adapted cycles;
- Review the use of the Cycle Hubs in the city centre (e.g. Oxford Road, City Tower, Salford Central);
- Opportunities to combine improved cycle parking with new seating and public realm/greenspace provision, such as “parklets”; and
- Explore the potential for innovative parking solutions that increase the space efficiency of cycle parking such as fully automated underground bicycle stores.

Manchester Friends of the Earth believes that Manchester City Centre and Greater Manchester needs to follow the example set by Local Authorities in London and implement a programme of installing on-street cycle storage facilities such as the Cyclehoop Bike Hangers – which utilise existing on-street car parking space.

Cycle parking should not be installed at the expense of pedestrian space.

More ambition needed: whilst, the cycling related proposals in the Transport Strategy are most welcome – overall we believe that the ambition for cycle journeys fails to meet the existing Manchester and Greater Manchester cycling targets.

The Transport Strategy does not reflect the ambition evidenced in other Greater Manchester documents with which it should be compatible. For example, the Greater Manchester Transport Strategy 2040 highlighted that the Greater Manchester Cycling Strategy, 2014 aimed “to **‘double and double again’** the proportion of trips made by bicycle by 2025, with the aspiration that 10% of all trips should be made by bike. (Page 21) In 2018, the Made to Move report restated the aim to “double and then double again cycling in Greater Manchester” via a 10 year £1.5 billion, ring-fenced fund.¹²

However, the Transport Strategy only envisions an increase in walking and cycling journeys in the morning peak from 16,940 (2018) to 28,500 by 2040 – a 68% increase. With cycling accounting for 2.3% of City Centre journeys in 2019, a 68% pro-rata increase by 2040 would mean a level of 3.8% cycling journeys. Such a small increase **clearly fails** to meet the ‘double and double again’ target by 2028 as outlined in both Made to Move and the Greater Manchester Transport Strategy 2040.

Recommendations:

The Transport Strategy must prioritise interventions that will increase the level of cycle journeys in Manchester City Centre to meet the ‘double and double again’ target.

Increase the provision of on-street cycle storage facilities.

Investigate becoming a demonstration City to highlight the potential for e-cargo bikes and micro-consolidation depots to replace diesel/petrol vans and reduce HGV traffic.

Ambition 4: The city centre benefits from better public transport connections

Manchester Friends of the Earth supports most of the proposals for improving public transport.

We welcome that the Free Bus service will “continue to play a complementary role in helping people travel around the city centre” and the Transport Strategy has identified other interventions to help improve the bus network including “bus gates, improvements to bus stops and the development of quality bus transit corridors.”

The Transport Strategy notes that “the environment of Oxford Road has also been transformed by the **bus priority** and cycling scheme” (p4) and also makes a general point

that to “optimise traffic flows and make best use of available road space, it may be beneficial to prioritise particular modes on the range of radials e.g. **bus priority** on one radial, primary cycle corridor on the next, highway traffic on another. This would lead to a reduction in the mix of traffic on our radial routes and allow for appropriate treatments both relating to surface and infrastructure to enhance the related mode on each of the radial routes.” (p47)

Manchester Friends of the Earth believes that both the City Centre Transport Strategy and Greater Manchester Transport Strategy 2040 need to implement more widespread bus priority and road space reallocation measures to deliver a quality bus network that is reliable and convenient to use.

The image below is from a presentation by Dr Rachel Aldred to Transport for Greater Manchester in January 2016 and highlights the importance of counting people not vehicles when considering how to allocate road space on an equitable and more efficient basis.

In the morning peak hour the combined bus and ‘cycle lane’ transported six times more people than the two lanes of general traffic.

Buses & Bicycles project (with Phil Jones, Luke Best)

- Peak Hour London Bridge
 - Bus/cycle lane carries 1,200 cyclists, 2,400 bus passengers
 - Two general traffic lanes carry 550 motorists (plus 50 HGVs)
- Current allocation creates delays for bus passengers and risk for cyclists – no space for safe growth without reallocation



"If it is true that all citizens are equal, then a bus with 80 people has a right to 80 times more road space than a car with one person." Enrique Peñalosa, former Mayor of Bogota, Colombia.¹³

Manchester Friends of the Earth supports the Bus Franchising proposals for Greater Manchester. We also support the Northern Powerhouse Rail proposals.

Manchester Friends of the Earth is concerned that the potential Metrolink / Tram-train proposals could see further loss of cycle carriage on existing longer distance train routes eg services to Glossop and to Stockport and beyond.

The Transport Strategy states that there is commitment to exploring further expansion of the metro / tram-train network: "Metro/ tram-train operation is something we are committing

to exploring further. We are currently studying the feasibility of testing tram-train technology in Greater Manchester, enabling adapted Metrolink vehicles to run on the same rail lines as trains. Tram-train technology and operations will initially be tested through pilot 'pathfinder' projects in selected locations. If successful, this could pave the way for a further expansion of our rapid transit network making much better use of our existing extensive network of rail lines by the 2020s and 2030s and will support the delivery of increased capacity of rapid transit services into the city centre."

We understand that Transport for Greater Manchester is engaging with tram-train vehicle manufacturers to explore what solutions are available and that the "current assumption for the tram-train vehicle specification is that the performance will need to, as a minimum, match what Metrolink provides". Since **Metrolink's current specification does not provide for cycle carriage**, we are therefore concerned that this will lead to a reduction in cycle carriage capacity across the network. For example, the refusal of Metrolink to allow cycle carriage has previously resulted in the loss of cycle carriage facilities between Manchester and Oldham where the existing train service was replaced entirely by Metrolink.

Friends of the Earth does not support HS2.¹⁴

Recommendations:

That greater priority be given to reallocating road space for the bus, walking & cycling networks on an equitable and efficient basis.

That any Tram-Train services continue to provide cycle carriage facilities.

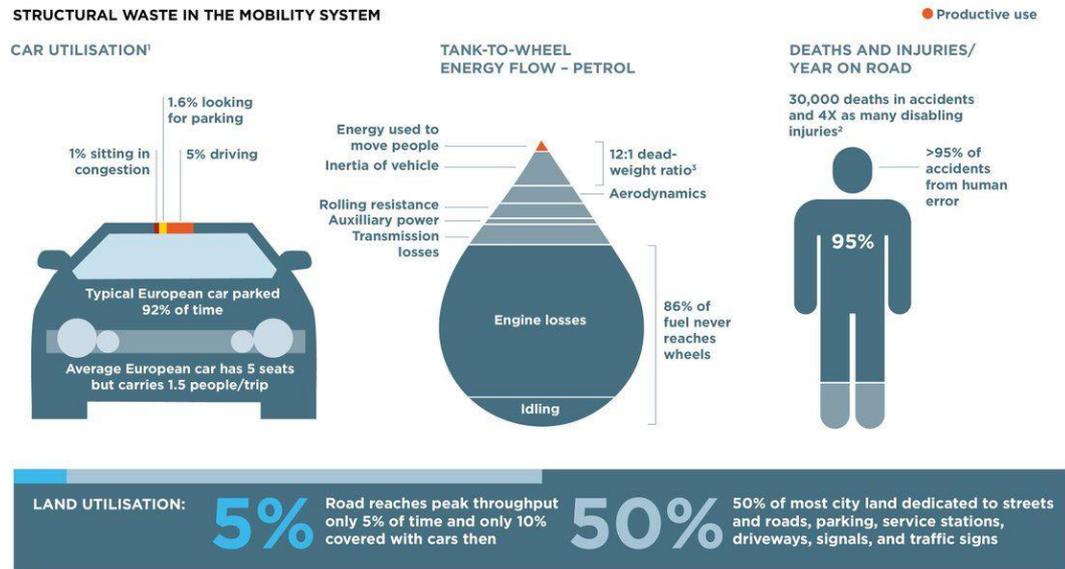
Ambition 5: Parking in the city centre is smarter and integrated with other modes

Manchester Friends of the Earth fully supports the proposals to reduce car parking in the City Centre including:

- Reducing the number of car parking spaces in the city centre;
- Supporting short-stay parking requirements over long-stay requirements in the city centre;
- Providing greater flexibility in how parking is used;
- Considering the needs of coaches, taxis and commercial service vehicles in our parking provision;
- Park and Ride / Mobility Hubs playing a more important role in access to the city centre
- Locating car parks close to major strategic routes into the city centre, in particular the Inner Relief Route and at locations to allow interchange to other modes and discourage driving into the core city centre;

Although we do not understand the proposal that seeks to "Encourage the use of car parks for long stay parking through appropriate pricing strategies" (p46) which appears to contradict the proposal outlined in the 2nd bullet point above.

Favouring car travel into and out of the city centre represents an inefficient use of space. The Ellen MacArthur Foundation estimated that 50% of most city land is dedicated to streets and roads, parking, service stations, driveways, signals and traffic signs. See image below.¹⁵



1 Based on car parked number for France and productive vs. unproductive driving time in US. 2 For every death on Europe's roads there are an estimated four permanently disabling injuries. 3 Based on average car weight of 1.4 tonnes and average occupation of 1.5 passengers of 75 kg. Source: EU Commission mobility and transport, accident statistics; www.fueleconomy.gov; EEA car occupancy rates data; S. Heck and M. Rogers, *Resource revolution: How to capture the biggest business opportunity in a century*, 2014; Centre d'études sur les réseaux, les transports, l'urbanisme et les constructions publiques.

Ambition 6: Goods are moved and delivered sustainably and efficiently into and within the city centre

Manchester Friends of the Earth supports many of the goods and freight logistics proposals outlined in the Transport Strategy such as:

- Develop an online platform for 2-way information sharing including the provision of live travel updates, utility works information and for sharing general best practice;
- Work with operators on micro-consolidation options served by modes such as e-cargo bikes
- Explore options for expanded use of secure e-lockers for personal shopping

The rapid growth in 'white van' delivery services contributes to carbon emissions, congestion and air pollution. There is great potential for e-cargo bikes to replace many of the City Centre delivery journeys currently made by petrol or diesel vehicles.

Recommendations:

Investigate becoming a demonstration City to highlight the potential for e-cargo bikes and micro-consolidation depots to replace diesel/petrol vans and reduce HGV traffic.

Ambition 7: Innovation is embraced where it benefits the city centre and its users

Manchester Friends of the Earth supports the use of new technology – particularly where it can help improve public transport (ticketing, information provision etc) and also where it can help reduce single occupancy car use.

Planning for autonomous vehicle use must consider potential impacts on pedestrian and cycling safety and convenience.

Delivery and Funding

The Transport Strategy provides some details for Committed Interventions which are – interventions that have significant funding allocated, and the case for change has already been demonstrated, although final funding arrangements and approval of the business case may still be needed;

There is also a reference to the Greater Manchester's Clean Air Plan funding package to “support local businesses to upgrade to cleaner vehicles; trebling the number of electric vehicle public charging points and other measures to support people, businesses, and organisations including schools across Greater Manchester to play their part in reducing air pollution from transport.”

However, the Transport Strategy does not examine local funding mechanisms that could operate at the city region level. Considering local funding options, Manchester Friends of the Earth believes that the city region should investigate potential schemes such as the Workplace Parking Levy, visitor lodging levy and a public transport payroll levy on employers – with funding ring-fenced for sustainable transport schemes.

Recommendations:

Re-allocate funding for new road building and road widening schemes to sustainable transport, walking and cycling schemes.

Investigate the benefits of local funding mechanisms such as the Workplace Parking Levy, visitor lodging levy and a public transport payroll levy on employers – with funding ring-fenced for sustainable transport infrastructure and services.

Notes

¹ https://www.manchester.gov.uk/downloads/download/7277/draft_city_centre_transport_strategy_2020

² See www.manchesterfoe.org.uk

³ A £400m investment to upgrade junctions, tackle bottlenecks, provide new roads and deliver new smart traffic signals at around 90 junctions.
https://assets.ctfassets.net/nv7y93idf4jq/1JkCTKjf3Gg4cCG6SMOQil/4de8eb327adb2c8fecfd2a654c6ce24c9/17-1821_GM_Congestion_Deal_2018_Final.pdf

⁴ See for example: <https://www.transportforthenorth.com/wp-content/uploads/manchester-north-west-quadrant-strategic-study-stage-3-report.pdf> and <https://www.gov.uk/government/news/305-million-road-improvements-for-greater-manchester>

⁵ Para 133, Greater Manchester Transport 2040 Strategy
<https://downloads.ctfassets.net/nv7y93idf4jq/1W2LPpKzCQCswygYyuklwm/05c300a3d59a3147ad7a51c5b8c28188/2-17-0078-GM-2040-Full-Strategy-Document.pdf>

⁶ **Greater Manchester Transport Committee meeting, 8th November 2019 minutes**
<https://democracy.greatermanchester-ca.gov.uk/documents/g2801/Public%20reports%20pack%2017th-Jan-2020%2010.30%20Greater%20Manchester%20Transport%20Committee.pdf?T=10>

⁷ See <https://roadswerenotbuiltforcars.com/mumford/>

⁸ Page 5, Greater Manchester Low-Emission Strategy and Air Quality Action Plan - Public consultation.

⁹ Page 26, Greater Manchester Air Quality Action Plan

¹⁰ See Atmosphere: Towards a proper strategy for tackling Greater Manchester's Air Pollution Crisis. https://www.ippr.org/files/2018-06/1528816909_gm-air-quality-june18.pdf

¹¹ Page 5, Greater Manchester Low-Emission Strategy and Air Quality Action Plan - Public consultation.

¹² Made to Move: 15 steps to transform Greater Manchester, by changing the way we get around.
https://assets.ctfassets.net/nv7y93idf4jq/1XtfykQs0g22g8cYCyoAag/dee5732015f23c5df3a338afc2353b74/Made_to_Move.pdf

¹³ <https://www.theguardian.com/cities/2016/oct/17/enrique-penalosa-mayor-bogota-colombia-bus-traffic-un-habitat>

¹⁴ See: The opportunity costs of HS2. <https://policy.friendsoftheearth.uk/insight/opportunity-costs-hs2>

¹⁵

https://www.ellenmacarthurfoundation.org/assets/downloads/publications/EllenMacArthurFoundation_Growth-Within_July15.pdf