

Transport Activists' Roundtable North West

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Wednesday, January 9th, 2008

Dear Sir or Madam,

CONSULTATIONS: 'A STRATEGIC PLAN FOR MANCHESTER CITY CENTRE' AND THE DRAFT 'REGIONAL CENTRE TRANSPORT STRATEGY'

The **North West Transport Activists Roundtable** (NW TAR) is an umbrella body which promotes sustainable transport and sustainable land use. We have been in existence for nearly 10 years, operating under the auspices of the Campaign for Better Transport-formerly Transport 2000.

Previously we have commented on the Greater Manchester Local Transport Plan and on the emerging vision for Manchester City Centre as well as on the Transport Innovation Fund bid. We would now like to offer our considered comments as part of your formal consultations on: the Strategic Plan for Manchester City Centre, 2008–2012 and also on the Regional Centre Transport Strategy Consultation Report. In doing so we feel we must express our concern about how poorly publicised these consultations have been and our disappointment that with our track record of engagement with Greater Manchester transport policy development and also with individual transport policy officers, we did not receive a direct notification and invitation to comment. Kindly ensure we are listed on all relevant contact databases. Thank you.

A STRATEGIC PLAN FOR MANCHESTER CITY CENTRE, 2008-2012

Over-Arching Comments

This document is out for consultation concurrently with Manchester City Council's Issues & Options paper for the Local Development Framework Core Strategy and yet the two are not harmonious. The 'Strategic' Plan should more correctly be called an economic plan. It is almost entirely economic focused with a nodding acknowledgement to the Community Plan. Important spatial/wider issues covered by the LDF document do not appear to play a part in the Strategic Plan. The Core Strategy Issues & Options paper reports that Manchester health is amongst the worst in the UK (p.11), that transport is the main contributor to air pollution and air quality, contaminated land and flood risk are "challenging" (p.17). It also recognises "there is a clear need to ensure that growth is managed within a climate change context" (p.24) and yet Manchester's Strategic Plan makes no mention of, and no attempt to address, any of these factors. It does flag up social exclusion problems but, in doing so, makes an automatic assumption that the jobs provided by the growth advocated would help address this, when such assumptions are invariably wrong.

continued ...

Preface

This consultation document, unlike the Regional Centre Transport Strategy one, is not illustrated (certainly the web-based version is not). As a result, certain aspects are unclear, particularly if it is read in isolation. For instance, the preface refers to "the surrounding city region". This is a vague concept which the NW TAR challenged through the Regional Spatial Strategy process because of the difficulty in pinning down precisely its extent and what it means in planning terms. It would be most helpful if an illustration were offered. If the Strategic Plan for Manchester City is to complement the Core Strategy Issues and Options consultation, as we believe it should, then we suggest that the illustration used on page 4 of the Issues and Options paper is repeated here.

Introduction

The introduction sets out an impressive array of facts in a series of bullet points. Half a dozen of them are economic-based, one is a population figure and the other is a crime statistic. Some further statistics on other subjects would be welcome to provide a more rounded picture. According to the Core Strategy Issues and Options paper, the key themes essential to the creation of sustainable communities are: education and skills, health, culture and crime (p.29). This strategic document would do well to bear this homily in mind.

Context

In this section, economic information is used in a way that is misleading with a reference to the GVA gap for the entire North of England. In fact, as the graph on page 5 of the LDF Core Strategy Issues & Option paper illustrates, GVA per head in Greater Manchester as a whole is holding up quite well compared with the UK average, while Greater Manchester South has a higher per capita GVA than the UK average. The text supporting the graph says: "GVA growth [is] expected to continue above the UK average" and it anticipates that up to 80% of the 147,000 new jobs which it predicts the City Region will create in the next 25 years will be in the Regional Centre.

A Vision for Manchester City Centre

The 'vision' makes no mention of quality of life or of anything connected with the environment. Whilst Manchester's declared intention to become Britain's Greenest City is flagged up later in the document (on p.14), it is not – as it should be – a part of the 'vision'. Similarly, there is no reference to the fact that Manchester is one of three cities appointed by the government to take the lead in cutting carbon emissions.

Under the section heading "....a place to invest" there is a commitment "to develop our transport infrastructure to ensure that anticipated growth is not constrained or inhibited" but no mention of "reducing the need to travel" which is acknowledged in Issues and Options paper (para. 4.4, p.18) as being one of the essential components of tackling climate change.

Neither of the following two sections: "...a place to work" nor "... a place to live" refer to the need to improve air quality for those who work and live in the city centre. In the City Council's press release of November 14th 2007, 'Manchester to Lead on UK Carbon Cutting Programme", it was revealed that carbon emissions across Greater Manchester are currently over 19 million tonnes per year, a figure which it said needed to be cut by six million tonnes by 2020. The news release said Manchester was to work with the Carbon Trust and the Energy Saving Trust "to develop a significant Greater Manchester-wide plan to achieve a low carbon economy which is both prosperous and sustainable". Surely these commitments and aspirations should be a fundamental part of the strategic plan?

There is no reference in the sections "...a place to live", "...a place to work" or "a place to shop" of environmentally friendly buildings nor, apparently, any appreciation of the concept of environmental capacity. There is the briefest reference to "the home market" but nothing is said about sourcing local goods or better freight logistics. There is no discussion of impacts on retailing outside the city centre if the retailing offer within it continues to expand.

"...a place to get around" refers to the needs and aspirations of pedestrians but, oddly, not cyclists. It then goes on to list some key components of the Transport Innovation Fund bid in as far as the city centre is concerned and it can be gleaned from this that the bid is as confused in its concepts as is this strategy document. Whilst the TIF bid does contain many laudable sustainable transport elements, it also includes "measures to improve the carrying capacity of the inner relief route" (and the Intermediate Ring Road) and "improvements to the quality and supply of car parking in key locations to ensure that the city centre remains easily accessible by car"!

In the section "...a place that thinks and creates" an opportunity exists to make a connection between the knowledge economy and how the use of IT can help to reduce the need to travel. There is an unintentional 'double entendre' in the last paragraph. The last sentence, immediately following on from a reference to the "city's edgy club scene" says: "Ensuring the space for more grass roots creative ventures to thrive" (!!).

How will we make this happen?

This part of the document contains one discrete 'green' paragraph, which is fine as far it goes, but it is dealt with as a stand-alone item. As the Panel Report on the Draft Regional Spatial stated last year, sustainable development and climate change need to be embedded throughout strategic plans. It is not adequate to pay lip service to them in this way.

A key example of how unrelated the 'Green and Sustainable' paragraph (on p.14) is to the rest of the document is the paragraph on 'Transport and Travel' which follows on from it two pages later (p.16-17). Out of six bullet points, car parking features in two and the focus is on building more transport infrastructure. Although a 'key principle' listed is 'reduce through traffic' it is difficult to see how this could be achieved if the capacity of the inner (and intermediate) ring roads are increased and there is no mention in this section of emissions, air quality or climate change.

Conclusion

This is not a 'strategic' plan as it claims to be because it lacks balance. It sets out an agenda for unstifled economic growth at any cost which makes assumptions about social benefits without any evidence base and its approach to the environment is nothing short of reckless. It fails to relate to other Manchester strategies such the emerging Local Development Framework, the Green City Programme and the Low Carbon Cities Programme. The benefits to health and the overall quality of life of creating a less polluted environment in the city centre do not appear to be understood. Or, even worse, they are understood and are intentionally ignored.

There are several references to the public realm but no apparent ones to the need to conserve and enhance the built heritage and to adopt more sustainable lifestyles. Ever more infrastructure is envisaged without any assessment being made of the capacity of the environment to cope with it. The future that this document envisages for central Manchester is quite simply not sustainable. It is earnestly hoped that this 'strategy' is rewritten in a vein much more in keeping with the ethos of the times in which we live and which brings to bear the knowledge that exists of the need to address major issues such as climate change.

DRAFT REGIONAL CENTRE TRANSPORT STRATEGY

Over-arching comments

The document sets out a plan to transformationally up-grade public transport in Manchester. Regrettably, it also envisages a huge increase in the car parking offer and the provision of extra road capacity, both of which would help to negate many of the sustainable transport initiatives.

The Regional Centre Transport Strategy is dependent on a huge amount of funding being made available. The Introduction states that the RCTS has been developed as a key underpinning strategy for the Transport Innovation Fund bid, so if the TIF bid is successful, that would provide most of the money. Funding for the Irwell City Park component would come from the Lottery.

However, it is not inappropriate to point out that now Bury MBC has withdrawn support for the TIF bid, only seven of AGMA's 10 councils are still in favour of it. Trafford and Stockport voted against at the offset. Our understanding is that a two- thirds majority is needed for the bid to be valid, so it would appear to be perilously close to failing. Also, the Irwell City Park lottery bid is competing against a bid from Blackpool, so that is also not a foregone conclusion. All of this prompts the obvious question - how much of the strategy would come about if these particular funding sources were not available? Developer contributions are mentioned under 4.5 'Piccadilly' and these could presumably be negotiated for other areas of the Regional Centre, but these could surely play only a very small part in funding these massive transport proposals? Is there a 'Plan B', we wonder?

We also find ourselves puzzling over the question of whether atmospheric and noise pollution in the Regional Centre would be reduced or not in view of aspirations in the 'Strategic Plan', commented upon earlier, and the many aspects of this strategy which are open to interpretation. There needs to be a quantitative assessment of emissions and noise levels as well as a study of environmental capacity before the RCTS is enacted. People deserve to know - will this strategy contribute to improved health and quality of life for the workers, residents and visitors – or not?

There is too much emphasis on reducing traffic congestion so that it is not a constraint on future economic growth. For instance, under 1.3 'A Vision for the Regional Centre', there is no mention of pollution in any of the sub-sections. We would suggest that perhaps at the end of the paragraph 'A place to live' could be added the words: "Reduction in transport- derived pollution levels will further increase the attractiveness of the Regional Centre" and at the end of the first paragraph of 'A place people can get to, and get around within' could be added (after "future growth"): "and as a source of atmospheric and noise pollution". Claims about tackling pollution will need some explanation as to how this can be achieved. Buses are crucial here and we are therefore very pleased to see that the improved service quality standards for buses referred to in the 'Bus Strategy' include a requirement to operate low emission buses. This will bring Manchester in line with the centre of London, which we understand already has such standards.

Mention of Climate Change is sadly lacking. Under 1.3 'A Vision for the Regional Centre' there should be another sub-section headed something along the lines of: ".....a place that aims to reduce the transport related emissions that contribute towards climate change". However, we would emphasise the same point here we made in our response to the strategic plan and that is that climate change considerations should be embedded throughout this document.

Under 1.3 'A place people can get to, and get around within', we would suggest deleting: "including the private car" from the second paragraph. There will of course be a place for the private car in the transport arrangements, but we do not believe it is appropriate to draw attention to it. It is already covered by the previous wording, "good accessibility by all modes".

Transport Innovation Fund

Greater Manchester Passenger Transport Authority/Executive (GMPTA/E), the Association of Greater Manchester Authorities (AGMA) and the individual Councils which make up AGMA, including Manchester City Council, have been at pains to keep the details of their bid for the Transport Innovation Fund (TIF) away from the eyes of the public, claiming that this secrecy was necessary because this is a bidding process and therefore economic sensitivities are involved. This being the case, the public should not be expected (or invited) to support a bid which they do not know the details of.

What we do know is that the bid does definitely contain an element of road building. This, to our mind, is completely at odds with the whole concept of the congestion TIF and if any road-building is allowed at all as a part of it, however it is contrived, it will be self-defeating to the wider plan. Similarly, a significant increase in car parking would work against all the more environmentally-sound initiatives that are a part of the plan. Where is the overall benefit to atmospheric pollution (and health) if some low-emission buses, along with more trams, are brought into service – but at the same time car travel outside peak times is not constrained and is in fact encouraged through improved roads and the provision of more car parking spaces?

One of the 'key principles' of the transport strategy is to "Provide a safe and pleasant environment for pedestrians and cyclists" (p.4) but surely, having an improved public realm is hardly an advantage if all the time people spend in it they are poisoning themselves due to poor air quality?

Also, the objective of incentivising changes in travel behaviour through the peak hour congestion charge (penultimate bullet point, p.5) could possibly prove counter-productive to some people on low incomes who find public transport expensive. It should not be forgotten that whilst the cost of driving has been falling, the cost of public transport has been rising. Does the TIF bid contain an element aimed at helping those with or seeking low-paid jobs who would need to travel at the times charging applied?

Heavy Rail

The Regional Centre Transport Strategy calculates that Greater Manchester ought to benefit to the tune of 60 additional railway carriages as a result of government commitments in the Rail White Paper which set out its High Level Output Specification (HLOS). However, in recent times some considerable doubt has arisen as to whether all of the additional rolling stock promised will in fact be delivered. This strategy informs us that the TIF bid envisages providing a further 25 carriages over and above those expected through the rolling out of the HLOs – but not until after 2012 (p.6). We would rather see those delivered now if the TIF bid is successful, along with the improvements mentioned to railway stations, and funding diverted from road schemes and car parking. We also have concerns about the design quality of improvements which are proposed for Victoria Station. Its heritage must be respected.

Metrolink

NW TAR supports extensions to Metrolink in principle but has made the point before, which we would like to repeat here, that we do have some issues with some routes and the proposed termini of some extensions. For instance, we do not believe the Ashton line should be terminated at Ashton. It should carry on to Stalybridge, an area of high unemployment desperately in need of better connections with the regional centre. As far as a "second city crossing" is concerned, we appreciate the need for this if the further expansion of Metrolink is to work well. However, at this early stage, we do not wish to comment on either of the two options outlined but look forward to taking part in the formal consultation promised for later this year.

Bus Strategy

NW TAR believe a robust bus strategy is particularly important because people seem much more willing to change from car to Metrolink or even heavy rail than to buses. And yet, other than shared taxis, buses are the only form of public transport which can reach into districts where people live that are off rail and Metrolink routes.

It seems that people are put off buses by various factors. The level of cleanliness – and tidiness – are undoubtedly contributory factors. Since the supply of free newspapers in Manchester – the *Metro* and the *Manchester Evening News* – the floor of the inside of buses is littered with copies or part copies of these papers. This is even more unsightly on a wet day when these become trampled on and muddy. So, extra cleanliness and tidiness could be a factor in improving the appeal of buses.

More important, though, is probably the reliability and speed of journey. This is where bus priority comes in. By giving buses their own road space in the form of bus lanes, allowing buses to access streets from which most other traffic has been excluded, giving buses priority at traffic lights, and better enforcement of traffic regulations.

Enforcement is crucial: it is vital to clamp down on bus lane infringement and this is now the responsibility of the local authorities. Enforcement is mentioned at bullet point 4 under 3.3 'Bus Strategy' on page 11 but methods are not elaborated on. The most efficient way of doing this is by the use of digital cameras, which are far more efficient than costly and old-fashioned videotape cameras. This should be referred to in the strategy.

- 3.7 'Cycling Strategy' is important and should be supported. It is suggested that other schemes being developed around the UK should be looked at, so that a similar approach could be adopted in the Regional Centre. This is a good idea but we would also add that we should look abroad for ideas to other European cities as well e.g. schemes in Copenhagen, Paris etc.
- 3.8 'Pedestrians' refers to improving signage in bullet point 8 on page 16. This is very important but it should be added that these should be made as vandal proof as possible (e.g. not of the type that can be swivelled round to face in the opposite direction!) and in keeping with the environment in terms of appearance.

The eighth bullet point under 3.8 'Pedestrians' (page 16) should be supported but we suggest the addition of another point: i.e. allowing more time to cross at signalled crossings, which is important for the elderly, those with children, or those with mobility problems.

- 3.9 'Parking' refers to maintaining on-street parking except where on-street space is required for increased public transport priority requirements. We would probably not have a problem with this, but we should add that, particularly at locations where the pavement is narrow, some method of deterring parking on the pavement, e.g. bollards, should be employed, so that pedestrians are not impeded.
- 3.3.2 'Bus Transit Provision' & 3.3.3 'Cross City Bus Services': We particularly like the idea of the Cross City Bus Service to provide cross centre connectivity, avoiding the necessity to change buses for those travelling between the north and south sides of the city centre although we would not want more than four routes to avoid clogging the city centre streets. We make no particular comment about the routes. Those suggested look quite reasonable at first blush. But we are very concerned that any reappraisal of bus services does not do away with a link between the learning centres, the hospital complex on Oxford Road and Piccadilly Railway Station. (See our more detailed comments on this in the penultimate paragraph on page 8).

Specific locations/services etc.

- (a) 4.1.3 Retail Core says that the transport strategy aims to provide ease of access to the city centre – both for cars (including parking where appropriate) and servicing vehicles. Obviously, servicing vehicles must have easy access but actively promoting car access would be counter-productive to achieving modal shift to public transport. However, as all this seems to depend on congestion charging being introduced, that might be a sufficient deterrent to continued use of cars. Without the congestion charge, we would not approve of measures to ease city centre access for cars.
- (b) 4.1 defines the Pedestrian Priority Core as being an area of the city centre where there is a high level of pedestrian activity, a number of existing pedestrianised streets and few public car parks. We would argue that there is a case for extending this area westwards i.e. to cross Deansgate to reach as far as the river. In this area there are a lot of important buildings and attractions e.g. the Spinningfields development, including the new Civil Justice Centre, the Pump House, the Masonic Hall, Opera House, the John Rylands Library, as well as all the retail outlets on the western side of Deansgate which inevitably involve a high level of pedestrian activity. A case could even be made to extend the area further south beyond Quay Street to Liverpool Road to include the Museum of Science and Industry. A further reason to extend the Pedestrian Core is that three of the four proposed Interchanges (Shudehill, Chorlton Street, and Piccadilly North) are on the edge of the Pedestrian Core, so offering ease of pedestrian access from them to the desired city centre destination. The fourth, Salford Central, is farther away from the Pedestrian Core periphery; extending the boundary westwards as suggested would bring it in line with the other three Interchanges.
- (c) 4.1.1 Piccadilly Gardens mentions the key Metrolink stop on the south side of this public space adjacent to the bus termination facility in Parker Street. This is indeed a key Metrolink stop, much used, as it covers the lines to Bury, Altrincham and Eccles. The short canopies currently provided are however, quite inadequate for the large numbers of passengers who wait there, particularly in the rush hour. On a wet day, some of them have to stand in the rain. The same applies to the very busy stop in St Peter's Square. Future proposals for Metrolink should include adequate waiting facilities e.g. a continuous canopy over the platform in key locations.
- (d) 4.1.1 Piccadilly Gardens: Proposals (Bullet 6). The plan to ban buses from Mosley Street has merit as it is dangerous for pedestrians crossing at the junction of Mosley Street and Parker Street. Currently, buses emerging from Mosley St. often swing round and approach pedestrians at speed.
- (e) 4.2 Deansgate: On the face of it, the proposal to widen footways here is good, but we require clear answers to points we raise below to understand how the various measures proposed would impact on other plans, including the knock-on effects of banning through traffic altogether, and the difficulty of differentiating between access and through traffic. Currently Deansgate is not a pleasant place to inhabit, owing to traffic volume and the consequent noise and atmospheric pollution. We instinctively want to support the proposals in this strategy, but are concerned the alternative vehicle route will create more CO2 emissions overall and have unwanted economic impacts. As we say above in our response (a), we do not want to see cars actively encouraged but on the other hand we see no advantage in introducing measures that would deter such significant numbers of people from trying to access places such as the existing M & S/ Selfridges car park and the Ramada Hotel that these businesses, along with others, were considered unviable. It seems to us that the issue of Deansgate needs much more thought, especially as we note it is part of the proposals for the Cross-City bus route Prestwich-East Didsbury, Nearside Routes 1ai, 4, 7 and 9 (from fig. 3.3) and a possible new second city Metrolink crossing. In addition to these, even if through traffic were banned, we understand that shuttle buses, delivery and service vehicles, cars requiring access and cyclists would still be using this key corridor, as well as pedestrians. So, we feel that the Deansgate Corridor needs to be the focus of a multi-modal study all of its own. However, the closure of Victoria Street (bullet 5) would appear to enhance that area for pedestrians and do justice to the Cathedral and Chetham's as important heritage buildings.

- (f) To bring about the above improvements in Deansgate, the traffic is to be rerouted via the Inner Ring Road. The proposal at bullet point 3 under 3.5 General Traffic is for the addition of an extra lane for clockwise traffic on the Mancunian Way but this is to be provided by removing the central reservation to create the necessary additional road space. We have mixed feelings about this because traffic will be travelling further and therefore creating more pollution but it would be restricted to 30mph, which should improve safety. However, we would like to see some detailed accident assessments and some assessments of carbon emissions before endorsing this.
- (g) The relocation of the coach station from Chorlton Street to the western edge of the Mayfield Goods yard site seems a sensible move. Strong pedestrian linkages across to Piccadilly station are of course essential and we are pleased to see that this is mentioned at bullet point 1 under Proposals for 4.4 Piccadilly Station and Eastern Gateway.
- (h) We very much support an improved interchange between Stockport bus and railway stations under 3.1 Heavy Rail (Station: Further Enhancements). At the moment, the shortest walk between the two involves negotiating steps not an enticing prospect with luggage or heavy shopping and it takes at least five minutes for a fit person. It is hard to see how the walking link could be much improved, assuming the bus station stays in its current location, but at least a pedestrian crossing could be provided across Daw Bank, which is often extremely busy with traffic and dangerous, especially near the junction with Exchange Street. What is really needed is a lift and/or a moving travelator or a frequent shuttle bus service between the rail and the bus stations that could then go on the serve the retail centre, which is at present isolated from the rail station. (Following the consultation on the Town Centre Master Plan 'Future Stockport' in 2006, a report to Stockport MBC's Executive in June that year endorsed all these options as possible solutions).
- (i) 4.6 Oxford Road Corridor: it is stated that this is one of the busiest corridors for buses in the UK with a high level of pedestrian activity and a poor accident record involving pedestrian casualties. This is certainly our impression also.
- (j) We were already aware of the high level of atmospheric pollution in the ORC. If any road needs tighter restrictions on bus emissions, it is the ORC.

It is stated that a key component of the strategy is a new Bus Transit scheme of high quality vehicles (hopefully that would include low emissions). We would support that. However, it is also stated that all other bus routes would be diverted onto Upper Brook Street or Higher Cambridge Street and although this is generally to be welcomed, we do have a caveat. A couple of years ago, a frequent stopping service (every 10 minutes) was introduced (the 147) which links all the three Higher Education establishments to Piccadilly rail station, as well as covering a link to the hospital complex on Oxford Road. It was extremely well patronised from the outset. The service obviously has filled a very important gap in public transport provision and, given the emphasis in the document on the importance of Manchester as a Knowledge Centre, this linkage needs to be preserved. The route runs from Hathersage Road along Oxford Road, turns right at Charles Street, left at Sackville Street, and then right along Whitworth Street to the Fairfield Street entrance to Piccadilly rail station. But looking at Figure 3.3, Nearside Terminating Local Services within the Regional Centre, we cannot see that this route is covered. In our opinion, it is essential to preserve it.

There is some mention of simplifying bus operations around the Northern quarters as well as Piccadilly and this is understandable in terms of improving conditions for pedestrians and legibility. Bus services do need to be reviewed regularly because they can become marginalised away from the main places where people need them. We are not convinced, however, that this bus strategy will necessarily tackle the problems of bus services getting 'bunched' in certain parts of the city.

Finally, we would just like to comment that the NW TAR do support car clubs and think that the 'whizz go' car hire scheme is commendable because initiatives like these have been shown to have a significant impact on reducing personal car use overall.

We hope that these detailed comments are of some value.

Yours sincerely

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