



TAR

Transport Activists' Roundtable

North West

www.nwtar.org.uk

NW TAR CORE GROUP

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Sunday, June 24th, 2018

Dear Team,

CONSULTATIONS ON THE CHESHIRE EAST LOCAL TRANSPORT PLAN 2018/23 AND THE SOUTH EAST MANCHESTER MULTI-MODAL STRATEGY (SEMMMS)

The North West Transport Roundtable (NW TAR), which operates under the auspices of the Campaign for Better Transport (CfBT), promotes sustainable transport and land use and healthier lives. We espouse 'Smart Growth' and reducing the need to travel.

Cheshire East Council is inviting comments on refreshes to its **Local Transport Plan** and on the **South East Manchester Multi-Modal Study**, strategies which it defines as being interlinked. Hence, this is a joint response. Before responding to the contents of the consultation documents, however, we wish to make the following points:

Road building agenda

Since its inauguration, Cheshire East Council (CEC) has consistently supported a strong road-building agenda. Whilst it has engaged in consultation exercises such as the present ones, no environmental arguments, contrary points of view or appeals to substantially change emphasis and financial commitments to sustainable transport modes have caused it to shift its position on any road scheme it has set its mind upon.

However, even by CEC's enthusiastic attitude to highway expansion, its insensitive timing in respect of a road-building announcement would take some beating. Whilst this LTP consultation has been 'live' – and claiming to seek views on a series of road schemes – the Council chose to publicise the next stages for three key road schemes. The June 12th media release revealed that a preferred bidder has been appointed to build the Congleton Link Road, the planning application for the Middlewich Eastern Bypass is in preparation and due to come forward soon and CEC had made another £400,000 available for scheme preparation of the A500 dualling between M6 junction 16 and the outskirts of Crewe. All schemes to be delivered within three to four years.

Environmental NGOs and objectors to specific schemes could be forgiven for asking themselves – what would be the point of lodging comments with CEC on new roads? Nonetheless, we are commenting on this occasion and would like to make the point that providing new highway capacity is only ever a short term solution and – because of the environmental consequences – ought to be seen as the last intervention for any transport problems, not the first. The abject failure of road building to deliver long term solutions is laid out graphically in CPRE'S 2017 report 'The Impact of Road Projects in England' <http://www.cpre.org.uk/resources/transport/roads/item/4542-the-impact-of-road-projects-in-england>)

Lack of discussion about Mobility as a Service (MaaS)

Over the last two to three years, there has been much discussion amongst transport professionals about 'Mobility as a Service' (MaaS). A Maas Alliance exists, papers have been written and presented about it, Atkins consultancy has a whole part of their website devoted to it and there have been articles and features in the transport press. Whilst there are some aspects of how it is conceived by some people which environmental NGOs could not support, there are many we can. For instance, NW TAR (and CPRE) support the concept of car clubs because research has shown they discourage people acquiring a second car, they encourage users to plan their journeys better and they lead to more people walking and cycling for short trips (when they don't have the use of a Car Club car). We also support the use of shared taxis and of car sharing.

However, although MaaS has now had plenty of airing amongst transport aficionados and would benefit from being explained and debated much wider, we note that there is no discussion of it at all in the CEC Local Transport Plan (LTP) refresh. This is a major omission. (It is mentioned in the SEMMMS strategy). We include as appendix 1, some website pages and articles on MaaS and invite CEC to consider how it might be applied, in a sustainable way, not only within Cheshire East but across its borders.

Cheshire East Local Transport Plan consultation information booklet

The booklet says:

"Our LTP needs to consider development within neighbouring areas, especially Cheshire West and Chester, Greater Manchester, Warrington, Stoke-on-Trent and Staffordshire as this growth will influence travel between these areas and Cheshire East". (Page 4).

This is a very odd statement as it covers all but two local authorities that Cheshire East has a border with (Trafford, Manchester City and Stockport all being encompassed within 'Greater Manchester'). Excluded are Shropshire to the south and Derbyshire/ High Peak District to the east. The implication being that CEC has no or little interest in what is planned in these counties. Yet Shropshire's Economic Growth Strategy envisages 'growth corridors' pointing to the HS2 hub at Crewe and, as the SEMMMS strategy explains (on page 38) the High Peak Local Plan has big development plans for New Mills, Chapel-en-le-Frith and Buxton - all bordering Cheshire East - plus a railway station at Chapel. Not to mention strategic initiatives such as the TransPennine Strategic Study being conducted by the Department for Transport, Highways England and Transport for the North and the implications this could have on the eastern side of Cheshire East.

Under 'Outcomes' NW TAR can, of course, welcome the recognition - in Outcome No. 4 on page 6 - of the need to improve air quality and of the negative impact of the transport network, but not the lack of commitment to modal shift or the lack of recognition of the importance of reducing the need to travel.

NW TAR is pleased that the number one priority of the 'strategy' on page 9 is to maintain and improve existing transport assets. The condition of the road infrastructure in particular and the need to maintain the road surfaces to a higher standard is always the top priority with the public when they are questioned about roads - not the expansion of highway infrastructure.

However, we believe that CEC is misguided in placing so much emphasis on 'Key Connections' (page 10) rather than on demand management. NW TAR totally disagrees with the main aim for 'neighbourhoods' on page 10 (item 1) being 'key connections'. We would argue that the main aim should be 'sustainable communities', places which have as many local services as possible so that the need to travel is reduced.

Under item 2, we query how much officer support exists to carry forward rail and bus initiatives. To date, there has been little evidence of CEC's interest in issues such as access to rail stations, cycle parking at and the condition of rail stations (not including HS2). Its record in relation to supported bus services is nothing to be proud of and initiatives for new type demand-responsive services have not come forward. Also, we are somewhat puzzled by the reference to motorway improvements under item 3 of 'Key Connections' as these come within the orbit of Highways England. This, we feel, is somewhat misleading.

Local Transport Plan draft for consultation

Paragraph 1.2 (and list in 3.2). The daughter documents should have been prepared and made available in time for this consultation so that a complete, holistic, picture could have been widely understood.

Paragraph 1.4. The list of road schemes is misleading as there is no differentiation between CEC schemes and HE schemes. CEC seems to be 'taking the credit' for the A556 Knutsford-Bowdon scheme (which is an HE scheme) when they did not even take part in the public inquiry.

Paragraph 2.2.1 – Transport as a contributor.... Outcome 1 might be highly laudable ('Communities are not severed or otherwise negatively impaired by road traffic') but it is totally unrealistic. A genuinely deliverable aim should be promised and new roads should only be built as a last option.

Outcome 3 ('More children are able to walk and cycle to school') is more likely to be deliverable if a team of 'Safe Routes to schools' officers were appointed. Also, if all railway stations were made safer and more accessible, more parents would be happy to allow their children to use trains to and from school.

Correction. Transport for the North is not a 'regional' body, it is sub national or pan-regional organisation.

4.3 – Cities and the Sub Region. The assumption is that it is the right thing to do to predict traffic growth and plan to meet it, despite this approach having been long since discredited. Trying to build sufficient road infrastructure to meet predicted demand is wholly unsustainable. Also, there are assumptions in here and in 5.1 ('Transport as an enabler for growth') about 'substantial economic benefits' to be gleaned. There can be no automatic assumption, in a mature economy such as that which exists in the UK, that providing more transport infrastructure brings with it economic benefits.

4.4 – UK Connectivity. This assumes huge economic benefits from HS2, despite other countries with very high speed trains having found that it is not the regions which benefit from them but the capital. Also, nothing is said about the need for CEC to fund the bulk of the enormous cost of the HS2 station at Crewe.

5.1 – Supporting growth and economic strength through connectivity. This quotes the Local Plan making provision for 36,000 new homes and 31,000 new jobs by 2030 (page 27). The CEC Local Plan may be a statutory entity now but NW TAR remains of the opinion (as we expressed at the examination in public into the plan) that the housebuilding and jobs targets are unrealistic and will not be achieved.

The 'Cheshire Science Corridor' referred to on page 29 was a sweeping spatial concept which was drawn across almost the entire North Cheshire Green Belt. It is a dangerous concept.

11.4 contains a passing reference to park and ride. It is to be hoped 'park and ride' is not seen as a great problem solver. There are any number of unintended consequences which can and do arise from park and ride sites and it is to be hoped that local communities would be involved in any decision-making.

12.1 – Monitoring and Evaluation. Prioritises 'efficiency' in terms of delays per hour travelled. This is not how the travelling public view their journeys. In survey after survey, the public rate reliability top for when they are travelling. They simply want to know how long a journey will take so that they can plan around it. They don't actually mind if a journey takes 10 or 15 minutes longer than may be the absolute ideal. They just want to know what the journey time is likely to be.

There is much in the LTP refresh about public transport and active travel. If NW TAR remains somewhat sceptical about the fine words on these topics, this must surely be understandable as CEC has not had a highly commendable track record on either (although it has improved on cycling). Nor has it invested in or helped to bring about railway station improvements (only Macclesfield station is mentioned in the SEMMMS strategy). We would like to see some imaginative demand responsive transport trials and some thinking around and implementation of MaaS type initiatives and we would also like to see plans for better access to and for cycle parking at all railway stations, plus the evolution of a network of greenways.

South East Manchester Multi Modal Strategy (SEMMMS) Refresh

Figure 2: Map of the SEMMMS area

The map of the SEMMMS area on page 7 of the full consultation document shows the SEMMMS area as cutting off immediately south of Wilmslow and yet the document itself is only too proud to highlight the delivery of the Alderley Edge Bypass as being a SEMMMS strategy outcome. However, the bypass is outside of the area indicated. Also, there is no appraisal of how successful or unsuccessful that bypass has been.

Appendix A: Responses to the Issues and Options Consultation

The North West Transport Roundtable (NW TAR) made significant submissions at the issues and options consultation stage of the SEMMMS refresh exercise to both Stockport MBC and to Cheshire East Council. These submissions do not appear to have been summarised or properly reflected in Appendix A of the SEMMMS Consultation Draft report of May 2018.

The submissions that were made are lodged on the North West Transport Roundtable website on the 'consultations' page, a link to which is provided here: <http://www.nwtar.org.uk/consultations.php> The Stockport submission appears under October 2017 and the Cheshire East one under April 2018.

The SEMMMS team may not particularly welcome NW TAR's analysis and comments, but it ought to include them in any summary of responses to consultations in the interests of transparency, the democratic right of free speech and transparency. Our submissions are sensible, well researched and well argued and do not resort to hyperbole or insulting language. They take a strategic view and deserve to be taken into account.

Appendix B: Recommended Interventions Package

The recommended interventions in the SEMMMS refresh, as in the original SEMMMS strategy, are based on the 'predict and provide' philosophy. This instils a tremendous sense of déjà vu. The recommendations also contain many public transport measures. So did the original SEMMMS final report published in 2000.

In the most recent submissions which NW TAR made to Stockport MBC and to CEC, (ie. the ones which are not reported in Appendix A), there is a summary of some of the previous documents lodged in respect of SEMMMS - most recently those specifically relating to the A6 to Manchester Airport Relief Road (A6 MARR). These included a detailed analysis of the public transport recommendations in that original SEMMMS report. The report stated that all the recommendations must be taken forward as a comprehensive package of interventions. This did not happen. Page three of the current SEMMMS consultation document makes the point only too clearly. It lists one SEMMMS road scheme which has been completed (the Alderley Edge Bypass), one road scheme which is under construction (A6 MARR) and another road scheme which has been given planning approval (Poynton Relief Road, formerly the Poynton Bypass), plus just two bus initiatives. None of the other public transport or active travel initiatives have come to pass – as we demonstrated in our reports. However, some have been replicated in the current consultation document – 18 years later.

We can, of course, support the non-highway related proposals. We can also support focused highway safety improvements at accident black spots. All such measures ought to be taken forward first and only then should options involving new or widened highways even be considered. And, before they are, traffic models should be amended to take into account the phenomenal rise in home working (an average of 14% of all working people according the ONS). Without this order of events, modal shift will never be achieved.

Yours sincerely,

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APPENDIX 1

Below from the MaaS Alliance website: <https://maas-alliance.eu/homepage/what-is-maas/>



What is MaaS?

Mobility as a Service (MaaS) is the integration of various forms of transport services into a single mobility service accessible on demand. To meet a customer's request, a MaaS operator facilitates a diverse menu of transport options, be they public transport, ride-, car- or bike-sharing, taxi or car rental/lease, or a combination thereof. For the user, MaaS can offer added value through use of a **single application to provide access to mobility**, with a single payment channel instead of multiple ticketing and payment operations. For its users, MaaS should be the **best value proposition**, by helping them meet their mobility needs and solve the inconvenient parts of individual journeys as well as the entire system of mobility services.

A successful MaaS service also brings **new business models** and ways to organise and operate the various transport options, with **advantages for transport operators** including access to improved user and demand information and new opportunities to serve unmet demand. The aim of MaaS is to provide an **alternative to the use of the private car** that may be as convenient, more sustainable, help to reduce congestion and constraints in transport capacity, and can be even cheaper.

Transport on Demand

MaaS fulfils users' needs for mobility with a wide range of transport services for both travellers and goods, offering tailor-made transport on demand. To meet a customer's needs, a MaaS service provider arranges the most suitable transport means, be it public transport, taxi or car rental, or even ride-, car- or bike-sharing.

A Subscription Service

No need to buy travel tickets or sign up for separate transport accounts: your MaaS account gives you, your family or your company the freedom to choose the mobility you need, for a single monthly or pay-as-you-go subscription.

Creating New Markets

For transport providers MaaS can offer new sales channels, access to untapped customer demand, simplified user account and payment management, as well as richer data on travel demand patterns and dynamics. The Alliance can help you position your business to take maximum advantage of this fast-growing new market opportunity.

MaaS Alliance is hosted by ERTICO – ITS Europe

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MaaS Alliance is registered in the European Union's Transparency Register (ID: 140593628433-52)

How can we achieve Mobility as a Service?

John Bradburn | 17 Mar 2016 |



The average UK household spends £324 per month on transport, according to the Office for National Statistics, and most of us probably don't even realise it. For many households, that cost is sunk into their car, and it's a cost we accept even though our road networks are suffering from heavy usage and we spend increasing amounts of time stuck in traffic. Others are tied to their train season ticket. Is it time to start thinking more creatively about the way we consume transport and spend our hard earned cash on it?

Mobility as a Service (MaaS) is one such innovation, providing a new approach to the way in which transport is delivered, managed and consumed. Often talked about conceptually, over the past year we have seen growing interest in thoughts of practically delivering MaaS – driven on by the launch of [MaaS Finland](#), which will oversee the launch of MaaS across the Nordic country.

What is MaaS?

"Mobility as a Service brings every kind of transport together into a single intuitive mobile app. It seamlessly combines transport options from different providers, handling everything from travel planning to payments. Whether you prefer to buy journeys on demand or subscribe to an affordable monthly package, MaaS manages your travel needs in the smartest way possible." MaaS Finland.

The easiest way to think about MaaS is to compare it to your mobile phone subscription. Your network provider may offer you a package deal, bundling a certain number of minutes, SMS messages and data. MaaS works in a similar way, offering different mobility packages to consumers, covering access to a range of modes, for example a monthly package might be made up of:

- 30 public transport rides
- 20 hours of car hire time
- Unlimited bike hire
- 5 taxi trips

Consumers would select the most appropriate package, opening up a range of modes for easy use through one integrated service.

The case for MaaS

For the consumer, MaaS will deliver an improved journey experience through the increased choice, easier journey planning and seamless ticketing and payment that MaaS promises. Replacing car ownership with a MaaS subscription could also deliver financial savings to users who no longer need to pay for a car that, according to Forbes, sits empty for 95% of the day on average.