



NW
TAR

Transport Activists' Roundtable

North West

www.nwtar.org.uk

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SEMMMS Strategy Refresh,
c/o Cheshire East Highways
and Local Plan Team

Saturday, April 6th, 2018

Dear Sir or Madam,

South East Manchester Multi Modal (SEMMM) Strategy Refresh – Issues & Options Consultation

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.

Over-arching comments

It is something of a puzzle to the NW TAR that Cheshire East Council (CEC) are conducting a consultation on the SEMMM Strategy Refresh some six months after Stockport MBC conducted a consultation on the same thing. Stockport have always taken the leading role in pursuing the SEMMM strategy. We had assumed that the initial consultation on the refresh which they conducted (and we responded to on October 7th, 2017) applied to the whole SEMMM area. However, we now encounter a 'refresh' of the consultation itself by CEC!

We note, however, that this consultation claims to focus on the part of the SEMMM strategy area which falls within Cheshire and that CEC are developing, in parallel with this process, a new Local Transport Plan.

NW TAR has interacted with SEMMMS – the South East Manchester Multi Modal Study – since the study came into being, promoted by the Integrated Transport White Paper: 'A New Deal for Everyone', in 1998. The first NW TAR Convenor, Stuart Murray, was the sustainable transport/environmental NGO representative on the SEMMMS steering group and ever since NW TAR has engaged with the SEMMMS process when opportunities have presented themselves. In those 20 years, our basic messages have been consistent, (unlike government transport policy). In a nutshell these have been:

1. A championing of the two major seminal reports of the 1990s by SACTRA – the Standing Advisory Committee on Trunk Road Assessment. The first, *'Trunk Roads and the Generation of Traffic'*, confirmed that providing new road space generates new traffic movements and the second, *'Transport and the Economy'*, showed that – in a mature economy such as that which exists in the UK – there is no automatic connection between new transport infrastructure and an improved economy.
2. Total support for the 1998 Integrated Transport White Paper that followed on from a Green Paper published by the previous administration, particularly the 'foreword' by the Secretary of State of what was then the Department of the Environment, Transport and the Regions (DETR). It said: *"We could not go on as before building more and more new roads to accommodate the growth in car traffic. With our new obligations to meet targets on climate change, the need for a new approach is urgent"*. Also: *"Better public transport will encourage more people to use it"*.

3. Instead of encouraging more travel, we should be reducing the need to travel via better planning. Notably we should be building on brownfields first, concentrating on urban regeneration and developing genuinely sustainable communities.
4. We should be doing everything in our power to tackle climate change (and meet our international CC obligations) and reduce carbon and other harmful emissions.
5. We should be striving to improve public health, notably by making it easier and safer to walk and cycle more, by improving air quality and by ensuring that robust health impact assessments are conducted on all major infrastructure projects.
6. We should be delivering improvements to public transport and the public realm first and only building new highway infrastructure/on greenfields as a last resort.

BACKGROUND

Ever since the SEMMMS final report was published, it has been referenced by the local authorities promoting the road schemes within it (Stockport MBC, Manchester City Council and Cheshire East Council) as though it is a reliable resource/piece of evidence that should be regarded as the foundation blocks for building upon. NW TAR has provided analysis previously to demonstrate that this was not the case – when making submissions on the first of the SEMMMS network of roads to be built – the A6 to Manchester Airport Relief Road (A6 MARR). The generic points still stand and many of the findings of the professionals who examined the case for the A6 MARR are relevant to the A523 Poynton Relief Road and to the preparatory work underway now for an A6 to M60 Relief Road or A6 Stockport North-South Bypass as it was historically known.

In January 2013 the North West Transport Roundtable (NW TAR) and the Campaign for Better Transport (CfBT) published ‘A folly in the making: SEMMMS A6-Manchester Airport Relief Road’ which is downloadable from the NW TAR website: (http://www.nwtar.org.uk/consultations/SEMMMSA6-ManchesterAirportRoad-NWTAR&CfBT_published_web.pdf). The report included papers by transport consultants Keith Buchan and Alan Wenban-Smith and by officers from the Campaign to Protect Rural England (CPRE) (Jackie Copley) and Friends of the Earth (FOE) (Helen Rimmer).

The key findings from that first report of January 2013 were:

Traffic & public transport modelling

No reliable picture had been presented by the modelling of current or future travel conditions. However, even as far as it went, the modelling predicted additional congestion and increased carbon emissions. It was apparent that building the new road would not restore conditions to what they were then. In other words, the scheme would not solve anything. Other key points were:

- Due to major changes since the SEMMMS final report was produced, the modelling carried out then and therefore the findings are no longer relevant
- Current modelling and forecasting is based on the road scheme alone and is not capable of comparing solutions across different modes of transport
- The model was inconsistent and it pre-dated the recession and many public transport initiatives such as the Northern Hub
- The majority of traffic model ‘benefits’ accrue due to longer distance traffic, not local traffic as was the stated purpose of the scheme
- There were unanswered questions about how known new and proposed developments had been included in the traffic model
- There was a lack of genuine sensitivity testing relating to assumptions about land use, parking, smarter choices and traffic stability forecasts
- There were major questions over whether the ‘Area of Influence’ was too small and therefore whether longer distance impacts were picked up
- New forecast and traffic models were needed to properly reflect the actual traffic growth that had taken place and the availability of new policy instruments since 2001

The Economics of the Major Scheme Business Case

The business case had serious weaknesses. They were:

- The strategic approach was based upon peripheral greenfield development (ie. an unsustainable growth strategy). This was predicted to have serious impacts on surrounding centres.
- Better economic results had been achieved in continental cities through a combination of urban regeneration and investment in public transport
- There was no guarantee that the Manchester Airport City/ Enterprise Zone would attract its identified niche market, ie. occupiers that were both airport-dependent and Greater Manchester-linked.
- Even if there was a determined strategy to limit users to the narrow target audience, there was no mechanism for doing so either through planning or as landlords. (And, in reality, the early occupants of the Enterprise Zone have been national and international roads-based logistics businesses).
- The SEMMMS strategy was designed within the context of the NW Regional Spatial Strategy which focused development on urban areas and on regeneration. That context has been lost.
- The £800m of economic benefits attributed to the A6-MARR was not well founded.
- Time savings accounted for 90% of economic benefits but their value was highly questionable.
- The 'benefits' were derived from comparing future projections – one with the scheme and one without. So the time savings in this case were compared with 'do nothing'.
- The value of time savings disappeared over time. In any event, other forms of economic benefit and any traffic growth were predicted to gradually cancel it out and then convert into time losses.
- Under both scenarios presented – build the scheme or do nothing – congestion was due to increase and the economy decline. In other words, both represented deteriorations from the present, falsifying the implicit claim to real economic gain from the scheme.
- 70% of the scheme benefits accrued after 2032 which did not inspire confidence.
- The management/delivery case was complex with many potential opportunities for it not to materialise
- The Earn Back model of financing depended on the infrastructure being delivered but there was a delay between the call for money (during construction) and it coming on stream (following occupation of developments). The anticipated timescale between the two was 10 years, which was optimistic.
- It was expected there would be a hit on the existing baseline yield from business rates as a result of businesses relocating to the Manchester Airport City/ Enterprise Zone.

The Environmental Scoping Report

The environmental scoping report was deficient for the following reasons:

- It made no reference to the Regional Spatial Strategy which was extant at the time (and a legal entity)
- The approach was not one that was likely to tackle all possible effects on the environment and on social and economic factors as required by the National Planning Policy Framework
- It was not based on up-to-date information (much of it dated back to 2003)
- It had not drawn on the River Basin Management Plan as required by the NPPF
- It had not called for the Sustainability Appraisal to follow DEFRA's Specific Impact Test
- It lacked the detail required by the Design Manual for Roads and Bridges (DMRB)
- It made no reference to the DfT's transport appraisal system
- It presented no evidence to indicate that several options had been analysed in detail and these had been whittled down from a longer list of potential solutions to identified problems. Investigative work appeared to have been conducted on one road option and one alignment.
- Only some of the potential landscape impacts are acknowledged and Natural England's National Character Area profiles received no mention.
- Sight lines were not asked for.
- Only one of the Green Belt's five purposes was mentioned. There was no attempt to quantify Green Belt loss. There was no requirement for a breakdown of the grade of agricultural land to be lost.
- There was no requirement for an assessment of the amount of hedgerows that would be removed or, particularly, for the amount of ancient hedgerows that would be lost.
- The subject of light pollution was inadequately covered
- The subject of air quality was inadequately tackled.

- The approach to the Health Impact Assessment was inadequate.
- Nature conservation and ecological requirements were approached in a less than robust manner.
- The Peak District National Park Authority did not appear to have been involved, contrary to the duty to co-operate.
- Many agreed and proposed developments of substantial scale did not appear to have been taken into consideration.
- The area covered by the Environmental Scoping Report was not sufficiently extensive.

Climate Change and Air Quality Impacts

- The cumulative climate change and air quality impacts (of all SEMMMS roads) had not been assessed.
- There was a lack of up-to-date traffic generation/ forecast for the Manchester Airport City/ EZ.
- The A6 MARR should not have been assessed in isolation from other linked major development.
- There were instances in Air Quality Management Areas in the south of Greater Manchester and Disley where the proposed road would worsen air quality levels that were already in breach of EU legal limits.
- The business case took insufficient cognisance of potential effects on human health
- The financial risk of the local authorities being fined for exceeding EU legal limits relating to air quality had not been taken into account in the business case
- The business case admitted that the scheme would increase carbon emissions. Greater Manchester's carbon reduction commitment was 48% by 2020.

After producing the above report, the NW TAR team members involved with it met with key SEMMMS team members and confirmed that their case for building the A6 MARR was predicated to a large extent on the SEMMMS findings that were published in 2001. The SEMMMS team were relying on evidence from the 1990s and traffic growth predictions which had not materialised. The environmental NGOs who attended that meeting were asked to catalogue the case they were making. They did so in a follow-on report entitled 'More reasons why the A6 MARR should not be commissioned', which they submitted in July 2013 as their contribution to the second stage consultation. This is also available on the NW TAR website at: <http://www.nwtar.org.uk/consultations/NWTAR2013SEMMMSresponse.pdf>.

The July 2013 NW TAR submission reminded the SEMMMS team in detail of the long list of public transport recommendations that were contained in the SEMMMS final report and analysed what progress, if any, had been made on them. The record was abysmal in respect of the non-road proposed solutions. Only two of the 22 SEMMMS final report recommendations could be said to have definitively moved in the direction of the recommendations. One was the main road building proposal and the other was in respect of rail freight. The former had been remorselessly pursued by the three promoting authorities despite massive changes in the surrounding circumstances but without the mitigating effects that were considered to be essential and the latter had come about as a result of private enterprise. Just three other recommendations could be categorised as 'work in progress'. Yet the much-lauded SEMMMS final report said:

"Finally, it is stressed once again that the strategy recommended by this study must be implemented in its entirety if its benefits are to be realised. It is not possible to pick and choose elements from the strategy because they are apparently the most popular or are easy to quick or cheap to implement. The full benefit of the strategy will only be seen when it is implemented as a whole". (Para. 10.13)

The July 2013 NW TAR report also included an analysis of the policy changes that has taken place in the 12 years since the SEMMMS report had been published and highlighted the fact they had not had any obvious impact on the determination of the local authorities to deliver the SEMMMS road schemes.

The conclusion to the NW TAR analysis described the SEMMMS traffic growth projections as *"spectacularly wrong"*. It was particularly critical of the fact that a bespoke traffic model had not been set up for the complex network of SEMMMS road schemes and that, as far as could be established, extensions to the Metrolink system and promises to deliver heavy rail improvements had not been factored into the modelling. There was also no plan to reassign road space and 'lock in' benefits, despite this being a 'sine qua non' of the SEMMMS final report and despite warnings in it that this meant the strategy would fail.

There was also a follow-on report by Keith Buchan in that submission in which he concluded:

- The fundamental criticism that the consultation depends upon the 2001 SEMMMS report had not been answered
- The evidence for change was weak and ignored other elements in the SEMMS package
- The modelling and forecasting had several serious omissions and
- The carbon forecast showed a deterioration as a result of the scheme and no data had been supplied to assess the proposals against carbon targets.

In December 2013 NW TAR and CfBT produced yet another report, this time in response to the planning application for the A6 MARR. Entitled 'A reasoned objection', this is also downloadable from and viewable on the NW TAR website:

http://www.nwtar.org.uk/documents/A_Reasoned_Objection_NWTAR_CFBT_A6MARR_171213.pdf.

This included an evidence paper from Sian Berry, CfBT's roads campaigner, on traffic trends and forecast, one from Keith Buchan on the scheme's justifications and use of traffic data, one from Helen Rimmer, North West Campaigner for Friends of the Earth on air quality and climate change, one from David Butler, NW TAR core group member and CTC 'right to ride' representative on health impacts and one from Janet Cuff, NW TAR core group member and Ramblers Association spokesperson reviewing the public footpath impacts of the scheme. It also included as an appendix an objection letter to the scheme from Dr. Anne Robinson of Friends of the Peak District. The conclusions and findings from that joint submission were:

- Traffic growth had been flattening out
- There were flaws in many assumptions behind the traffic flow data
- There were many questionable aspects to the modelling which did not model cycling and walking
- The economic model was overly optimistic and speculative
- The health impact assessment was wrong to assume there would be more benefits than disbenefits from the scheme, based on assertions about economic opportunities
- Properly conducted tests on alternatives to road building were not carried out
- The scheme would not meet its objectives
- Modal split in the target area was already dominated by car and would not be helped
- Insufficient attention had been paid to air pollution and knock-on health impacts
- Overall, harmful emissions would rise, breaching EU standards
- Building the road(s) would effectively drive a horse and cart through sustainability and carbon reduction plans and policies that the promoting LAs were signed up to
- The impacts on people's health of increased noise and air pollution
- The big populations within easy access to the rolling countryside would lose a previous and very convenient resource on the urban fringe where it is currently possible to get away from the stresses of modern day life and enjoy some tranquillity
- The Green Belt would be breached between Greater Manchester and Cheshire East.

The catalogue of evidence listed above (under 'Background') was drawn together by NW TAR to try and prompt a reappraisal in relation to the first of the SEMMMS roads. It was not given due weight by the promoting authorities at the time and the construction of the A6 MARR is now well underway. NW TAR believes this is a travesty for all the reasons stated. It will merely create more pressures for more roads.

Context within which the SEMMM Strategy Refresh is being undertaken

Included in the bullet point list of issues in the current CEC consultation document on page 3 are:

- *Delivering modal shift to reduce the impact of travel demands and encourage healthy lifestyles and*
- *Increasing investment in cycling and walking*

These are issues we can wholeheartedly support but we question how CEC is going to achieve modal shift when it continues to favour investment in road building, and to pull funding from subsidised bus services. And we are obliged to point out the inadequacy of its historic investment in cycling and the lack of officer support for cycling and walking. In other words, making non-specific promises about increased investment is meaningless. The increase needs to be substantial and there should be specificity around the promises.

Air quality, carbon and school and commuter traffic

Last year Cheshire East Council admitted it had manipulated air quality data. The council confessed to falsifying air quality data readings between 2012 and 2014. An independent report revealed that in some areas of the Borough figures were altered to give a false sense of compliance with legal air pollution limits.

We would also point out that Client Earth have repeatedly taken the UK government to the Supreme Court over its lamentable approach to air pollution, harmful emissions and climate change.

Air quality in Cheshire East will not be improved if the principal authority persists in promoting road schemes – which will only encourage more trips by car. It would be irresponsible – and in contravention of existing commitments and new requirements – for the SEMMMS strategy to progress without much more robust evidence being collected in respect of air quality and the results feeding into ongoing work.

Similarly, Cheshire East needs to seriously address the issue of carbon reduction. The UK is signed up to international commitment on carbon reduction but is doing very little about it. Much more needs to be done on reducing the need to travel and on providing 'safe routes to schools' which would enable more children to get to and from school on foot and on bicycles, thereby reducing the 'school run' traffic.

The consultation document flags up travel-to-work patterns, highway congestion and overcrowded trains and clearly sees the answer to the problems as being the provision of more road space. It will not be. We would like to draw attention to the continuing rise in home working. Three years ago this was recorded by the Office for National Statistics as averaging 14% in the North West - and the graph was steeply rising.

The NW TAR note that Transport for the North are developing a Northern Transport Demand Model which will cover both road and rail. We would suggest it is imperative that the SEMMMS work is fed into this model before progressing to the testing and options development stage.

Concluding Remarks

NW TAR would like to highlight the excellent report published in March last year by the Campaign to Protect Rural England (CPRE). *'The end of the road? Challenging the road-building consensus'*. It reveals that road building is failing to provide congestion relief and the economic boost which is always promised in parallel. (<http://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>).

We would also like to remind CEC of its own commitments to "deliver modal shift and encourage healthy lifestyles" and to increase cycling and walking investment and of an original SEMMMS' recommendation – that a cycle network should be established. We now have a national 'Cycling and Walking Investment Strategy' in place which asks Councils to plan high quality, comprehensive cycling and walking networks.

We would also like to appeal to CEC to be more concerned about the outstanding environment which exists on its doorstep in the form of the Peak District National Park. Enabling more visitors to access the Park by car is not a good thing. Nor is depleting the Green Belt between Greater Manchester and CEC.

Finally, we would point to the fact that other developed countries are pressing forward with plans for non-car-based transport solutions in order to make their built-up areas more liveable and we would like to emphasise the need for CEC to consider climate change in everything it plans for.

We would like to be kept apprised of the SEMMMS strategy and progress on the Local Transport Plan.

Yours Sincerely,

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