

Cheshire East Council
Local Transport Plan team,
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Jonathan Clarke

Dear Sir or Madam,

CONSULTATION ON CHESHIRE EAST COUNCIL'S VISION FOR TRANSPORT

CPRE (formerly the Campaign to Protect Rural England) Cheshire Branch welcomes the opportunity to participate in the consultation on Cheshire East Council's 'Vision for Transport' as the first stage in the production of a new Local Transport Plan. However, we do not answer your questions 12 to 19 inclusive as these are aimed at individuals.

- Q.1 Which of the following best describes how you are responding to this consultation?
 As a local resident
 As a town/parish councillor
 On behalf of a group, organisation or club
 An elected member of Cheshire East
 On behalf of local business
 Other
- A1 On behalf of an organisation
- Q.2 If applicable, please give the name and postcode of the group, organisation, club or business you are responding on behalf of:
- A.2 CPRE, the countryside charity (formerly the Campaign to Protect Rural England); CW10 9AT.
- Q.3(a) Based on evidence, we have identified 6 key transport challenges which Cheshire East is currently facing. How strongly do you agree or disagree that these are the key transport challenges?
- A.3(a) Lack of transport options leads to social exclusion and isolation 'Strongly agree'.

 Lack of physical activity and poor health 'Tend to agree'.

 Insufficient travel options lead many residents to rely on private cars 'Strongly agree'.

 Accessibility barriers limit economic growth 'Tend to agree'.

 Severe weather increasingly challenges network resilience 'Tend to agree'.

 A shortage of funding to maintain and improve transport networks 'Tend to agree'.
- Q.3(b) Would you raise any other transport challenges that should be considered?
- A.3(b) The need to meet climate change commitments and reduce air pollution.

 Insufficient real commitment to non-car modes and to reducing the need to travel by car.

 Bus service budget cuts. Inadequate provision of EV charging points.

- Q.4(a) How strongly do you agree/disagree that these are the key opportunities for Cheshire East?
- A.4(a) High potential for a shift to more sustainable travel 'Strongly agree'.

 Encourage walking, wheeling and cycling to improve public health 'Strongly agree'.

 Enhance the transport network to drive economic growth 'Strongly disagree'.

(because this question almost certainly relates to highway capacity)

New technology can help us meet our transport needs – 'Strongly agree'.

Tailoring transport solutions to our local areas – 'Tend to agree'.

Collaboration with partners and the community and voluntary sector – 'Strongly <u>dis</u>agree'. (because the options offered do not include environmental NGOs such as CPRE, the National Trust, the Wildlife Trust and others).

- Q.4(b) Would you like to raise any other opportunities?
- A.4(b) Here again, as with the previous question, there is no cut-across to opportunities to tackle climate change, air pollution or other harmful environmental impacts by agreeing to focus entirely on sustainable transport interventions and digital communications. We recommend CPRE's sustainable transport policy as the foundation for a Local Transport Plan (https://www.cpre.org.uk/resources/cpre-transport-policy/).
- Q.5 Our vision for the future transport network in Cheshire East is:
 'A connected, safe and sustainable transport network, accessible to all, that supports a healthy, prosperous Cheshire East'.
- Q.5(a) To what extent do you agree or disagree with our proposed vision for transport?
- A.5(a) 'Strongly disagree' because the vision does not represent the three 'legs' of sustainability. It only represents the economic and the social legs.
- Q.5(b) Are there changes you would like to see?
- A.5(b) Yes. The vision should be:

'A connected, safe and sustainable transport network that has minimal effect on the environment, is accessible to all and that supports a healthy and prosperous Cheshire East'. It needs to be recognised that transport is responsible for nearly a third of all greenhouse gases (GHGs) and GHGs from road transport make up 22% of total GHG emissions in the UK (https://www.data.gov.uk/dataset/9568363e-57e5-4c33-9e00-31dc528fcc5a/final-uk-greenhouse-gas-emissions-national-statistics).

- Q.6(a) How strongly do you agree/ disagree that the aims identified are the right ones to focus on?
- A.6(a) Growing the economy 'Tend to <u>dis</u>agree', because the economy is prioritised, whereas it should be on an equal footing along with social considerations and the environment. Improving wellbeing of our community 'Tend to <u>dis</u>agree' because the focus is on enabling people to travel whereas the primary focus should be on ensuring that everyone has access to digital communications, green spaces and clean air.

Reducing environmental impacts – 'Strongly agree'. This is the first reference to the environmental impacts of transport.

Improve connections for all – 'Strongly agree' that a priority is to provide attractive alternatives to private cars.

- Q.6(b) Do you have any additional aims you think we should consider?
- A.6(b) Yes Reducing the need to travel and also better integrating transport and land use. See the evidence document behind CPRE's transport policy:

 https://www.cpre.org.uk/resources/cpre-transport-policy-evidence/.

GROWING THE ECONOMY

- Q.7. How important is each of our priorities for growing the economy?
- A.7 Providing transport networks that support sustainable development/business opportunities Providing <u>sustainable</u> networks is 'very important'. Not more roads.
 - Supporting/ growing the local economy through improved physical and digital connectivity.

 We disagree with these two measures being ranked together. It is 'extremely important' to support digital connectivity as this reduces the need to travel. It is 'not so important' to support improved physical connectivity (which encourages travel)
 - Enabling recruitment and skills retention through better transport links. This is 'not so Important' because the prime necessity is to ensure that excellent digital communications are available to everyone and to facilitate active travel and provide sustainable transport. 'Transport links' could simply be a euphemism for more roads.
 - Facilitating sustainable travel choices to residents of new developments from the day they move in. This is 'extremely important'.
- Q.8 How important is each of our priorities for improving the wellbeing of our community?
- A.8 Improving accessibility to essential services is 'extremely important'.

 Enhancing safety and the sense of security for every journey is 'extremely important'.

 Providing the infrastructure to increase levels of physical activity is 'extremely important'.

 Supporting the delivery of affordable transport choices for all is also 'extremely important'.

REDUCING ENVIRONMENTAL IMPACTS

- Q.9 How important is each of our priorities for reducing environmental impacts?
- A.9 Supporting more environmentally friendly forms of travel, providing local infrastructure and improvements to support decarbonisation is 'extremely important'.
 - Reducing transport related emissions through a reduction in vehicle miles to respond to the climate emergency is 'extremely important'.
 - Providing a resilient transport network to climate change and extreme weather is 'extremely important'.
 - Mitigating the impact of transport improvements and infrastructure on the environment is also 'extremely important'.

IMPROVING CONNECTIONS FOR ALL

- Q.10 How important is each of our priorities for improving connections for all?
- A.10 Providing active travel networks that make walking, wheeling and cycling the natural choice for short journeys is 'extremely important'
 - Improving the reliability, frequency and accessibility public transport options, including local and on demand services and community transport is 'extremely important'.

- Supporting individuals with their personal travel choices, integrating trips and focusing on those areas with the highest travel demand is 'very important'.
- Maintaining the existing transport asset, seeking opportunities for cost-effective, safe, sustainable improvements is 'extremely important'.
- Targeting investment in the safety and accessibility of the transport network to best achieve the Local Transport Plan outcomes is 'very important' but investment decisions should also be based on environmental limits and impacts.

ANY OTHER COMMENTS

- Q.11 Do you have any other comments to add which we should consider when developing Cheshire East's new Local Transport Plan?
- A.11 CPRE has a number of comments to make on the consultation brochure, on the evidence document that backs it up and on what we hope to see in the Draft LTP.
 - i. Under 'Collaboration with partners and the community and the voluntary sector' (page 8), Cheshire East Council's (CEC's) Vision document makes no mention of working with environmental non-governmental organisations such as CPRE, the Wildlife Trust and others and yet we have much we can bring to this exercise.
 - ii. In May 2019 CEC committed to becoming carbon neutral as a council by 2025 this year. Subsequently, that date was re-set to 2027 and, according to a progress report published in January, the Council has reduced its own emissions by 15.3% and achieved 60% of its target to reach carbon neutrality in two years' time. Separate from this, in October 2021, CEC took the decision to join with other councils and make the UK100 climate pledge, committing the whole borough to being carbon neutral by 2045. In view of these commitments, it is surprising and disappointing that tackling climate change is not seen as the key over-arching theme for the Local Transport Plan. Climate change is mentioned only briefly in the consultation brochure – in relation to severe weather events and the reliance that the borough's residents have on using cars to get around. This does not set out the true picture. The Evidence Base Report reveals that transport is responsible for 34% of all harmful emissions (para. 6.9). Also, according to the Climate Change Committee's 7th carbon budget, the UK will need to cut its greenhouse gas emissions by 87% in order to meet its net zero targets (https://www.theccc.org.uk/publication/the-seventh-carbon-budget/).
 - iii. Air quality is not mentioned at all in the consultation brochure, although it is in the evidence base report. It is important that the evolving LTP is judged against not just the climate change commitments but the Air Quality Action Plan.
 - iv. Although there are images of trains in CEC's u-tube video and in the consultation document, access to rail stations is an issue that is only featured in the Evidence Report. Table 4-15 features a Transport for the North Station Quality Demand Model that highlights how poor access is to so many stations in CEC. This is an issue that should be addressed in the LTP. It is currently difficult or impossible for people with any type of mobility impairment to access and egress all parts of many, many stations. CEC needs to agree to a programme to address this issue.
 - v. CPRE earnestly hopes that the Draft LTP will be properly rural-proofed.

Yours faithfully,

LILLIAN BURNS
Planning and transport policy volunteer
On behalf of CPRE Cheshire Branch