



Campaign to Protect  
Rural England  
CHESHIRE

c.c. County Councillor Andrew Needham  
Mr. Tom McCabe

Mr. Greg Yates, County Transport Co-ordinator,  
& Mr. Colin Kennington, Principal Transport Officer,  
Cheshire County Council,  
Rivacre Business Centre,  
Mill Lane,  
Ellesmere Port, CH66 3TL.

Saturday, December 31<sup>st</sup>, 2005

Dear Mr. Yates and Mr. Kennington,

**RE: BUS STRATEGY**

This is the response by the Cheshire Transport Campaign Group of the Campaign to Protect Rural England (CPRE) to Cheshire County Council's consultation on its 'Bus Strategy for Cheshire'. Regrettably, the tone of this submission is somewhat negative due to the poor quality of the consultation. The justification for this criticism and the author's credentials are given below.

The author of this submission has worked as a full-time volunteer for CPRE, concentrating mainly on transport issues, since the Integrated Transport White Paper was published in 1998. She has seen and responded to - along with her colleagues - a deluge of consultation documents which that White Paper unleashed over a period of seven years, increasingly at the regional level, both on behalf of CPRE and also the North West Transport Activists Roundtable (NW TAR) of which she is the Convenor. Consequently the complaints listed are based on accumulated knowledge and some considerable experience not only of inter-acting with Cheshire County Council but with other local authorities around the region and with the regional agencies. The author also contributes, via CPRE National Office, to its responses to national consultations and has spoken at two Government Office for the North West (GONW) events for local authority officers on Local Transport Plans (LTPs).

This latest Cheshire C.C. consultation is defective for the following reasons:-

- The length of the consultation is one calendar month - and that includes the Christmas and New Year period. (The invitation to take part is dated December 5<sup>th</sup>, 2005. Comments are required by January 6<sup>th</sup>, 2006). This is one-twelfth of the period recommended by the Cabinet Office's Code of Conduct for public consultations. Such a very short consultation period - over a major public holiday - will prevent local consultative committees and most other groups from responding properly or at all.

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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- The consultation is even lower-key and less well-publicised than usual for Cheshire CC. It was not launched with a press release, it does not appear on the CC's website and it has not been circulated to many wider stakeholders such as individual Parish Councils. (Not that Parish Councils could have responded in the timescale in any event).
- Whilst the option of submitting responses by e-mail is offered, it is not possible to take part in the consultation inter-actively on line.
- The covering letter with the questionnaire states: "*this consultation is taking place before the Strategy is written so that everyone's views can be taken into account when writing it*". This statement is misleading because it makes no reference to the fact that extant bus and interchange strategies exist, nor to the fact that there is already a four-page draft bus strategy outlined in Annex 6 of the Provisional Local Transport Plan submitted to government in July of this year. Para. 6.1 of this begins: "*Cheshire's revised bus strategy sets out the County Council's vision for bus travel to 2011 and beyond*". It then goes on to set out the principles of the strategy. Why is no mention made of this, nor copies circulated with the consultation?
- The consultation itself is poorly compiled and limited in its focus. The way the questions are phrased and the fact that it does not mention demand-responsive and flexible services, or give any examples of them, guides respondents towards only thinking of traditional commercial-type services with fixed timetables. There should have been some thought-provoking examples or background papers. For instance, Question 1 could have referred to the County Council's own C-Net scheme (mentioned in the Provisional LTP) and canvassed potential interest in it and also taken the opportunity to explain about best practice elsewhere such as the award-winning Lincolnshire Interconnect service which comprises fast, high quality cross-county bus services with interconnecting services to villages and hamlets.
- The consultation misses an ideal opportunity to have canvassed the idea of a comprehensive network of high quality yellow school buses throughout Cheshire (similar to the LTP major transport scheme bid currently being promoted by Greater Manchester). This is particularly to be regretted. CPRE strongly suspects that this would have proved extremely popular with respondents if it had been suggested to them. Most members of the public would not be aware that highway authorities can make this type of intervention a major scheme bid.
- The introduction to the consultation makes reference to limited resources and "difficult choices" but fails to explain that if the County Council as a highway authority chose to package together a series of Quality Bus Corridors (QBCs) as its major scheme bid it could – instead of road schemes. In fact, it fails to mention QBCs altogether! Nor does it mention the array of other funding sources available to highway authorities ranging from the new TIF funding to the special challenge bid programmes.
- Neither the covering letter nor the introduction to the questionnaire sets the bus strategy in a wider context. It deals with bus travel as an isolated issue rather than in a holistic manner.

CPRE would argue that quite apart from improved bus services and bus stops - which are the main focus of this consultation - the need is for high quality multi-modal interchanges, greater consideration of the walking environment to access bus stops, including the need for networks of greenways and quiet lanes, and more real-time information at bus stops. There is also a long-overdue need for Cheshire CC to give due weight to the fact that a quarter of its residents live in rural areas and to learn from best practice in other authorities. CPRE has previously quoted good examples from elsewhere such as the 'Carnforth Connect' project in Lancashire which offers seamless links between bus and rail and a pleasant environment for public transport users.

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Shortly after the author became Chairman of CPRE's Cheshire TCG in 1998, she wrote a paper about the need for a more flexible approach to public transport in the County, particularly flagging up the potential value of taxi-buses and shared taxi-services. That paper was endorsed by the Countryside Agency and it prompted a meeting between Cynthia Nelson and Lesley Gleaves from the County Council's Transport Co-ordination Unit, Paul Fawcett on behalf of the Countryside Agency and herself. It was also attended by two Chester taxi drivers interested in supplying a demand-responsive service but who did not want to commit to any type of time-tabled service which might involve them running empty journeys. Nothing came of the meeting. Since then the TCG has contributed to all the different Cheshire County Council consultations on transport – including those on the bus and interchange strategies - and the author spent some time serving on the Cheshire Rural Transport Partnership before becoming disillusioned with it.

One innovative scheme in particular which emerged from that partnership was a resounding failure – the Microbus – but the reasons behind that failure are not well catalogued. It took over two years to get the service up and running. As a result, the actual teenagers canvassed about it were driving by the time the scheme became active. So, not only had the potential customers changed, so had the parents in many instances. With a new audience, it was imperative that it was actively promoted on the ground in the venues the youngsters go to and in their schools – and by a young person they could relate to. The original Rural Transport Partnership Officer fitted the bill, put in a lot of groundwork on the scheme and spoke to a significant number of young people, but was then tempted away to a consultancy. Regrettably, he was not replaced and there was something of a hiatus. Subsequently, the job was divided between the Community Council and CCC's Transportation Unit and took on a different public face and approach.

In previous responses to CCC consultations on public transport, CPRE's Cheshire TCG has quoted specific examples of interesting and successful examples of demand-responsive services around the country. Meanwhile the NW TAR has submitted copies of its annual analysis of all the region's LTPs and Annual Progress Reports (APRs) to each local authority – as well as directly to the DfT and GONW – and these have highlighted examples of innovative public transport schemes such as those aimed at deprived urban areas in Halton and those aimed at rural areas outside Bury in the Greater Manchester Plan. However, to date CCC have often re-visited previous mistakes, notably by continuing to introduce rural services with convoluted routes and which offer no late afternoon or evening return journeys, rather than reacting to the desires of local communities and well researched submissions by CPRE. They have also been reducing bus station facilities in Macclesfield and Chester. And their plans to spend £5 m. on a park & ride site at Hoole which would only be accessible by car but only £1.5 m. on a poorly designed interchange scheme for Chester railway station are reprehensible and ought to be reviewed.

Rather than repeating in detail previous submissions here, which CPRE has little reason to be confident will receive due consideration, we can do no better than refer the Transport Co-ordination Unit to the Countryside Agency's excellent 'Rural Connections' publication of February 2005 (CA 206), which is downloadable from the CA website. Another good reference document is the Department for Transport's publication 'Flexible Transport Services' of 2002. An earlier publication from the DETR 'From Workhorse to Thoroughbred' was also excellent. It would be extremely heartening if the final version of the CCC bus strategy which appears in the final LTP submitted to government in Spring 2006 promised high quality interchanges, did not see taxis and private hire vehicles as totally separate entities (as they are in para. 6.2 of the Provisional LTP) but envisaged taxi-buses and shared taxis playing a part in the bigger picture and if the bus strategy demonstrated an interaction with other strategies and policies, eg. safe routes to school, and a willingness to incorporate new ideas and a much more flexible approach.

Yours Sincerely,

**LILLIAN BURNS**

Vice Chairman, CPRE Cheshire Branch/Chairman, CPRE Cheshire Transport Campaign Group