

Let's Talk about Transport, Insight & intelligence,
Cheshire West and Chester Council,
The Portal,
Wellington Road,
Ellesmere Port,
CH65 0BA.

Vice Presidents
Dame Fiona Reynolds DBE
Ali Miraj
Branch Chair
Jonathan Clarke

4 January 2024

Dear sir/madam

CW&C LOCAL TRANSPORT PLAN 4 (CASE FOR CHANGE) – CONSULTATION ON PHASE 1

As part of the 2023/4 initial consultation on the Cheshire West and Chester Council Local Transport Plan Four, **CPRE (formerly the Campaign to Protect Rural England), Cheshire Branch**, has considered the following documents: 'The Future of Transport in Cheshire West & Chester: Our Case for Change'¹, 'Local Transport Plan 4: Case for Change – Policy Review'² and the evidence base behind these documents³. This is our submission.

Our Introductory Comments

A great deal has changed since Cheshire West and Chester (CW&C) produced its first Local Transport Plan in 2011 – an Integrated Transport Strategy for 2011–2026. The list of statutory consultees in Table 2.1 in that original document included three regional bodies that no longer exist – Government Office for the North West, the North West Development Agency and 4NW (formerly the North West Regional Assembly). It also listed the Highways Agency (now National Highways and an integral part of the DfT) and English Heritage (now Historic England).

Since the first decade of the millenium, when LTP 1 was researched and written, climate change has come much more to the fore, as has an awareness of a depleted environment and poor air quality that affects health – factors that are forcing a change in how governments and populations think about travel. Digital communication has been encompassed by an expanded population and the Covid pandemic altered patterns of working and commuting. There have been many changes to planning, local authorities have struggled with a period of austerity and here in the North of England, Transport for the North has come into being with a statutory responsibility for over-arching transport strategy. Most recently, transport planning has been thrown into the air with the cancellation of the phases of HS2 that would have impacted on the east of the borough and its replacement by 'Network North'. What has not changed are the boundaries of the Borough or its location. A very odd aspect of the Introduction to LTP 1 was that it described Cheshire West and Chester as lying "*between the Welsh border and the Wirral in the West, the Mersey Valley to the North and the Shropshire border to the south*" (page 5). There was no reference whatsoever to Cheshire East Borough to the east with which it shares its longest border and with which it shares a police service (and police and crime commissioner), a fire and rescue service and a very long history. It is to be hoped this rather strange anomaly will not be repeated in any future geographical descriptions of the borough.

THE FUTURE OF TRANSPORT SUMMARY CONSULTATION DOCUMENT

The presentation of the summary document is impressive and the preamble rightly identifies that transport is a leading contributor to the climate emergency. It is in fact the greatest contributor to greenhouse gas emissions nationally⁴. This document does not shrink from identifying that too many neighbourhoods are dominated by

¹[3a174b6e2680f0ca24768031a9eb8cf7_CWAC_LTP4_Brochure_v6_LR.pdf \(amazonaws.com\)](https://www.amazonaws.com/139f87ee20462a3645f6b4d98d8fcbec_Policy_Review_v11_Final_for_engagement_with_cover.pdf)

²[139f87ee20462a3645f6b4d98d8fcbec_Policy_Review_v11_Final_for_engagement_with_cover.pdf \(amazonaws.com\)](https://www.amazonaws.com/139f87ee20462a3645f6b4d98d8fcbec_Policy_Review_v11_Final_for_engagement_with_cover.pdf)

³<https://participatenow.cheshirewestandchester.gov.uk/27963/widgets/80689/documents/50835>

⁴ At 34%. In 2019 total transport emissions (including international air and shipping) amounted to 167 million tonnes CO2e out of a UK carbon budget of 494.5MtCO2e. 2021 UK final GHG emissions final figures – data tables Table 1.3 2019 is calendar year Jan-Dec <https://www.data.gov.uk/dataset/9568363e-57e5-4c33-9e00-31dc528fcc5a/final-uk-greenhouse-gas-emissions-national-statistics>

polluting traffic and it accepts that healthy solutions are needed. The key problems that need to be tackled are clearly set out, as are the five proposed priority areas, the nine building blocks and the timetable. It is obvious that considerable time and effort went into producing the public-friendly, highly illustrated, version of where the borough sees itself heading. We do not comment on the content here, however. Our submission on the actions proposed by CW&C are made in response to the detailed policy document (below and on the following pages).

LOCAL TRANSPORT PLAN 4: CASE FOR CHANGE – POLICY REVIEW

1.0 EXECUTIVE SUMMARY

Cheshire West and Chester Council has adopted as its starting point for its new Local Transport Plan the three pillars of sustainability – the environment, the economy and society. They are to be applauded for this. That said, we would contend that, in fig. 1 on page 1, some crucially important issues are not listed and there could be some improvements/qualifications to the existing wording.

- The list alongside the ‘Environment’ bubble should include ‘Improving air quality’.
- The list alongside the ‘Society’ bubble should include ‘Providing easy access to the countryside, open spaces, essential services and leisure facilities’ and, instead of ‘Improving access for disabled people’, a more inclusive phrase would be ‘Improving access and facilities for the mobility-impaired’. (Not everyone who is mobility-impaired is disabled and some are only suffering temporary mobility impairment) ⁵.
- The list alongside the ‘Economy’ bubble should include: ‘Bolstering the rural economy’. Also, ideally, ‘Delivering housing’ should be ‘Delivering eco-friendly housing’ and ‘Supporting Tourism’ should be ‘Supporting manageable levels of tourism’.

2.0 INTRODUCTION

THE TABLE LISTING KEY POLICIES

Environment

In the table on page 2, National Policy should include:

- . the Environment Act, 2021, which encompasses – amongst other things – schedules on biodiversity net gain and new air quality frameworks
- . The Levelling Up Act, 2023 (this should appear in every section, not just ‘Economy’)

Society and Place

The NPPF is listed, but the reference is to the 2021 version. The newest version was published on December 19th, 2023. Also, as stated under the ‘Environment’ sub-heading above, ‘Levelling Up’ currently only features in the ‘Economy’ section in the table on page 2. Yet, the Levelling Up Act covers, amongst any number of other things, Local Plan making. Local Plans, of course, include many policies which affect ‘Society and Place’ as well as the environment and the economy.

Economy

The date quoted for ‘Levelling Up in the UK’ needs to be altered to 2023 to reflect when the Act came into being.

Transport and Connectivity

The ‘National Policy’ section of this part of the table should include:

- . The Cycling & Walking Investment Strategy 2 (CWIS) by Active Travel England, 2023 ⁶ and also
- . ‘Network North: Transforming British Transport’ by the Department for Transport (DfT), launched by the prime minister on October 4th when he announced the cancellation of HS2 Phases 2a and 2b. Despite the title, this is a national document. It flags up transport interventions throughout the UK that the government says it will fund ⁷.

⁵ CW&C’s Evidence Base document refers to “people with mobility or visual impairment” (para. 4.2.1, page 94)

⁶ <https://www.gov.uk/government/publications/the-second-cycling-and-walking-investment-strategy>

Also, obviously, if the long-expected new guidance on LTPs has been published by the DfT before this document progresses much further, then that should feature in the list as well and the whole document must be compliant.

3.0 ENVIRONMENT

CPRE very much welcomes the emphasis on and the Council's expressed determination to tackle climate change, achieve net zero carbon emissions and improve air quality. We also note the reference to the government's Environment Improvement Plan. However, we don't see any reference to the Environment Act of 2021⁸ and its requirements for biodiversity net gain and for local air quality management strategies, etc. Nor to the new environmental outcomes reports which the Levelling Up Act says will replace environmental impact assessments. And, we would like to see specific commitments to 'Protecting valued landscapes and environmental capital' and 'Conserving important open spaces'.

We note that the policy document flags up several different decarbonisation strategies that have emanated from government and from Transport for the North (TfN) but would point out that, regardless of these, the government and TfN continue to promote many environmentally damaging road schemes and to champion air travel – the most polluting form of transport. CPRE's North West Regional Group submitted a substantial response to the TfN consultation on its second strategic plan in August 2023. In it we were critical of a number of aspects of the Plan. (CPRE Cheshire's response to TfN's draft plan can be viewed on our website at <https://www.cprecheshire.org.uk/news/cpre-responds-to-transport-for-the-north-transport-plan-consultation/>).

4.0 SOCIETY AND PLACE

It is important to cross reference different strands of work and different surveys being carried out within Cheshire West and Chester Council. CW&C's Borough Plan consultation draft, 'Working Together for a Stronger Future', reported that – from the feedback received – the three 'quality of life' factors rated by participants as most important were:

- i. The condition of roads, pavements and cycleways
 - ii. Being able to influence decisions that affect them and
 - iii. The level of crime
- i. Re. the condition of roads, pavements and cycleways. These issues cut across both the 'Society and Place' theme and also the 'Transport and Connectivity' theme and should therefore be mentioned in both. Where 'Place' is concerned, it is a public realm issue. As far as 'Transport' is concerned, it is a highway asset management issue.
- ii. Re. 'being able to influence decisions', CPRE Cheshire suggested, in its response to the consultation on the Borough Plan, that Cheshire West and Chester might consider establishing a full-blown Citizen's Assembly whose debates and recommendations are in the public domain. We are aware that, in 2020, CW&C established a Citizen's Panel but have no idea how this is functioning due to lack of transparency. Using the search engine on the CW&C website and typing in 'Citizen's Panel' yields no responses.
- iii. Re. the levels of crime. This is already reflected in one of the 'Society' sub-headings, ie. 'Making safer, greener and attractive neighbourhoods', but it could perhaps be emphasised more with a commitment to work more closely with the Police and Crime Commissioner and to seek more prosecutions for speeding and anti-social motoring offences.

5.0 ECONOMY

Regional

We question whether the section on the Cheshire and Warrington Local Enterprise Partnership (LEP) on page 22 (5.2.2) should remain in view of the fact that the government is ceasing to fund LEPs from April 2024 and, from that date, their functions are being handed over to local authorities (LAs) and to combined authorities (CAs).

⁷ <https://www.gov.uk/government/publications/network-north>

⁸ <https://www.gov.uk/government/news/world-leading-environment-act-becomes-law>

Presumably, planning is already well underway within the Council, working out how it will fulfill the functions previously performed by the LEP. And/or if moves are going ahead for Cheshire West & Chester, Cheshire East and Warrington to form a Combined Authority, then it is assumed that CW&C is discussing with the other LAs how economic matters will be handled. It might be more apposite, therefore, to reference the in-house plans for the future rather than those of an organisation that will have ceased to exist by the time the new LTP is operative.

6.0 TRANSPORT AND CONNECTIVITY

National

We note that this section begins by quoting the five-year-old Transport Investment Strategy ‘Moving Britain Ahead’. Has this not been pre-empted by ‘Network North: Transforming British Transport’ which, in all but name, appears to be a White Paper? Not that CPRE are promoting this document in its entirety because, whilst there is much in it that CPRE can support, it also contains the promise of funding for a total of 70 road schemes throughout the UK. We do not believe that providing more road capacity is a sustainable way forward. However, we do welcome – amongst other things – the government’s promise to electrify the North Wales Main Railway Line, something which will vastly improve west-east rail journeys via Chester.

It is very reassuring to note that CW&C are aware of and are taking on board the DfT document ‘Future of Transport, helping local authorities to unlock the benefits of technology and innovation in rural transport’⁹, especially as we felt obliged to criticise the Borough Plan consultation document for not being rural-proofed.

Local

As referenced under ‘Society and Place’, the findings from the early feedback on the CW&C Borough Plan should be reported on and imported into the LTP. The quality of life factor preference that applies to this section is ‘The condition of roads, pavements and cycleways’. It is always interesting to note that, whenever Transport Focus carries out surveys of road users, the issue which matters most to the participants is always the need for better maintained roads.

On Rail: CPRE Cheshire, which has long supported calls for the re-instatement of a Beeston Castle and Tarporley Railway Station, welcomed the announcement by the DfT in October that it had approved the outline business case for the re-opening. We eagerly anticipate the delivery of this project and would also like to see improved access to all railway stations, particularly rural ones, and to both sides of the track wherever possible.

On Buses: We commend CW&C for having a ‘West Chester Bus Improvement Plan’ which it developed in collaboration with bus operators. We also commend them for recognising that their plan is not working as intended and needs bolstering and we look forward to improvements in the near future. We would also like to say that we were delighted by the prime minister’s announcement in October – that the bus service between Northwich and Chester will be doubled. This is very much supported.

On Cycling and Walking Infrastructure: CPRE would like to see a commitment in LTP 4 to establish a network of on-road Quiet Lanes and off-road Greenways. A suitable pilot area would be the Peckforton Hills – currently being considered for the designation of a National Landscape, this being the new title of what were formerly called Areas of Outstanding Natural Beauty. For information, following much lobbying from CPRE Cheshire, the very first LTP by Cheshire County Council (CCC) committed to delivering a Quiet Lanes project in the Peckforton Hills, but the idea was stymied when funding promised by Crewe & Nantwich (C & N) Borough Council was pulled. (The scheme was to have been a jointly funded project by CCC, Chester City and C & N. Other schemes suggested by CPRE were listed as well but, in the end, only one very small scheme was delivered in Macclesfield Forest).

THE EVIDENCE BASE

PROMOTING HEALTHY COMMUNITIES

The breadth of the demographic information is impressive and the presentation is excellent and we applaud the effort being made to understand where transport poverty exists and how to tackle social exclusion. We also note

⁹ <https://assets.publishing.service.gov.uk/media/652e37b46b6fbf0014b757a9/dft-future-transport-supporting-rural-transport-innovation.pdf>

the finding that car use in the rural areas is above both the national and the regional norms, partly due to the fact that public transport in these areas is poor. The resolve to seek “attractive sustainable alternatives” (page 56) is supported.

SUPPORTING A THRIVING ECONOMY

CPRE agrees with the ‘key challenges’ identified for Chester, Ellesmere Port, Northwich and Winsford on pages 84 to 87. On the matter of empty retail units in the city and town centres, we would argue that the need is for a Smart Growth approach. Master Plans should be drawn up for each of these key centres, looking at re-allocating some areas currently designated for retail, commercial and employment use to residential or other use. It would be better to reduce and consolidate those areas and have more people housed in the city and town centres who would provide more trade for the remaining businesses, rather than trying to prop up outdated development models. As recognised by CW&C, more people now work from home and have home deliveries of products they need. It makes no sense to retain the level of employment land previously allocated or the amount of retail space.

DELIVERING EFFICIENT NETWORKS

We note the assessment that the Rights of Way network was only accessible to a low percentage of people with mobility or visual impairment at the time the survey was conducted (ie. only 15%). This is clearly a matter which needs to be addressed.

There is a reference to the fact that “a number of new park and ride sites are currently being considered”. CPRE would not be in favour of any new park and ride sites that were located on Green Belt or on important open spaces or which had a detrimental effect on rights of way, wildlife or important habitats (pages 119 and 120).

In the rail section, it will be necessary to revise the text relating to HS2 following the cancellation by government of Phases 2a and 2b.

We welcome the ‘School Streets’ and the 15-minute neighbourhood initiative and also the introduction of 20 mph schemes in appropriate areas (page 130).

We also welcome the fact that Cheshire West and Chester Council is seeking measures other than road-building, eg. improved junction technology and sustainable transport alternatives, to deal with areas of traffic congestion. And we are encouraged by the Council’s expressed determination to increase levels of walking and cycling.

PROTECTING ENVIRONMENTS

CW&C declared a climate emergency in 2019, as did many other local authorities around the same time. Unlike many others, it appears to be determined to steer away from transport measures which would increase the threats to the environment and which would only exacerbate climate change. The natural environment, landscapes and wildlife as well as the heritage assets are clearly valued and the need to improve air quality and reduce pollution appear to be paramount. All this gives much hope that CW&C’s Local Transport Plan 4 will be a genuinely sustainable strategy for the borough.

EVIDENCE GAPS IDENTIFIED IN THE INTEGRATED SUSTAINABILITY SCOPING REPORT OF NOV. 2023

We note the evidence gaps identified in the Integrated Sustainability Scoping Report, ie. the need for updated information on wildlife habitats and protected species and the need for a better understanding of nutrient neutrality, biodiversity net gain and the Local Nature Reserves, and we trust that these gaps will be addressed – most particularly in view of the declaration that new park and ride sites are being considered.

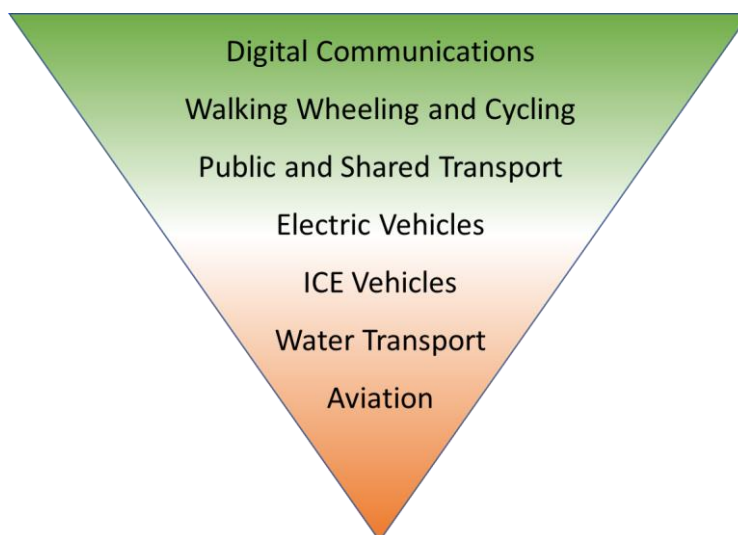
CPRE’S TRANSPORT PHILOSOPHY

CPRE’s transport philosophy concurs with the ‘Promoting Sustainable Transport’ requirements in paragraphs 108 and 109 of the NPPF that was published in December 2023¹⁰. We believe it is essential that, in order to reduce the need to travel, land use and transport planning are integrated. Poorly located sprawling development leads

¹⁰ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

to continuing car dependency, with all its adverse impacts, and loss of valuable countryside. Planning for new development should provide good access by non-car modes. This needs to be considered from the start, before sites are allocated, and ideally centred on the ability to achieve effective and attractive public transport – trains, light rail, high quality sustainably fuelled buses. The other key factor that reduces the need to travel is ensuring that populations have good digital connectivity. CPRE would like to commend to CW&C its sustainable transport hierarchy. It is based on that of the Energy Savings Trust, although it differs slightly from it.

CPRE's Sustainable Transport Hierarchy



[NB 'ICE' vehicles are those powered by the Internal Combustion Engine.]

This inverted triangle forms the basis of CPRE's recently renewed transport policy which is due to be endorsed by the national CPRE board early in 2024.

CONCLUDING REMARKS

The consultation material available gives the appearance that CW&C's philosophy is not far removed from CPRE's philosophy. We are particularly pleased to note the prominence given to the urgent need to address the climate emergency and poor air quality and the fact that there do not appear to be any proposals for new roads. We very much support initiatives such as 'School Streets' and 15-minute neighbourhoods and also 20 mph schemes where appropriate. Of the other CW&C plans of which we are currently aware, our main concern is around the siting of any new park and ride sites. Unless they are sited on easily-accessible brownfield sites, it is unlikely we would feel able to condone them. (Whilst we are obliged to Jack Hubert-Mayhew for his prompt feedback on this subject matter, following a question raised on behalf of CPRE at the LTP webinar on December 18th, his response appears to leave the matter open to conjecture for the time being). Our key plea is for CW&C to commit to a network of Quiet Lanes and Greenways, ideally starting with a pilot scheme in the Peckforton Hills. We would also like to see improvements to the rights of way network generally, making it more accessible to the mobility impaired, and a programme of access improvements to all railway stations.

Yours faithfully,

Jonathan Clarke,
Chair, CPRE Cheshire