

Registered office at:

Victoria Buildings, Lewin Street,
Middlewich, Cheshire, CW 10 9AT.

Telephone: 01606 835046

Email: info@cprecheshire.org.uk

Website: www.cprecheshire.org.uk

Royal Patron

HM The King

Branch Vice President

Peter Raynes

Branch chair

Jonathan Clarke

Registered Office at:

Rushtons Accountants, Shorrock House, 1 Faraday
Court, Fulwood, Preston, PR2 9NB.

Telephone 01772 378831

Email: info@cprelancashire.org.uk

Website www.cprelancashire.org.uk

Royal Patron

His Majesty The King

Group President

Nick Thompson

Branch Chair

Lindsay Beaton

Greater Manchester Transport Strategy,
Transport for Greater Manchester,
2 Piccadilly Place,
Manchester, M1 3BG.
transport2050@tfgm.com

Monday March 9th 2026

Dear Sir or Madam,

**CONSULTATION ON THE GREATER MANCHESTER TRANSPORT STRATEGY 2050
AND THE GREATER MANCHESTER TRANSPORT DELIVERY PLAN (2027-2037)**

The Campaign to Protect Rural England (CPRE) welcomes the opportunity to comment on the Greater Manchester Transport Strategy and its Delivery Plan.

CPRE has championed the value of the countryside since it was established 100 years ago. We advocate for policies that support sustainable land use, well designed development and a thriving natural environment.

For our centenary year, we commissioned a poll to establish the public's view of the countryside and it revealed near universal support for protecting the countryside: <https://www.cpre.org.uk/news/three-quarters-want-more-protection-for-uk-countryside-new-poll-reveals/>. We also asked people to sign up to our 'Letter to England' – which has so far garnered nearly 8,000 signatures and is still active: <https://www.cpre.org.uk/celebrating-our-centenary/our-letter-to-england/>. Our centenary vision is for a countryside that's greener, more resilient and protected for future generations.

All of that said, we are not an organisation which opposes all development – a label often given to us. We support urban regeneration and development on brownfield sites and are supporting proposals for a New Town at Manchester Victoria North.

Please note that this submission (below) is on behalf of two CPRE Branches – Lancashire, Liverpool City Region & Greater Manchester Branch and Cheshire Branch.

Yours sincerely,

Edward Taylor (MRTPi, MCD, MA Urban Design)

Planning Manager,
CPRE Lancashire, Liverpool City Region
& Greater Manchester Branch
E: eddy.taylor@cprelancashire.org.uk

Lillian Burns

Planning policy volunteer,
CPRE Cheshire Branch
E: lillian.burns@cprecheshire.org.uk

COMMENTS, BY CPRE LANCASHIRE, LIVERPOOL CITY REGION AND GREATER MANCHESTER AND CPRE CHESHIRE BRANCHES, ON THE GREATER MANCHESTER TRANSPORT STRATEGY 2050 AND THE GREATER MANCHESTER TRANSPORT DELIVERY PLAN (2027-2037)

We have structured the response largely based on the longer online questionnaire.

1. VISION (page 55 -)

What are your thoughts on our transport target" to improve our transport system so that, by 2040, 50% of all journeys in GM will be made by sustainable travel (public transport, walking, wheeling or cycling)? This would be a change from 40% sustainable transport at present.

Much too low - v

Please explain your answer

The vision in relation to transport (page 55) is: *'A transport system for a global city-region'*.

It ought to be: *'A carbon-free transport system for a global city-region'*, bearing in mind that the aspiration is for Greater Manchester to be a carbon neutral city region by 2038 – well within the timeframe of the strategy being consulted upon. (Ref: *'Environmentally responsible*, pages 63 and 83, *'Our Environment'*, page 73, and Network Policy 12 on Climate Change, page 85.

With regard to the **Our right mix target** - More ambitious targets with respect to reducing car usage should be set which would fit in with Greater Manchester's ambition to be seen as a global city-region. Other cities around the world have seen significant improvements in reducing car usage, such as London and Paris but this is not limited to capital cities. For example, in 2017 **Ghent, Belgium** implemented a "circulation plan" which over the course of a weekend restricted through-traffic in the city centre. This reclaimed public spaces for its residents and led to a 16% reduction in car journeys in one year and a doubling of the share of commutes by bike to 20%.

Do you think there is anything important missing?

Part C: Vision should emphasise integrating transport planning and land use planning. This is key to making both work.

It should also have something more about air quality improvements and road safety improvements.

We regretted the scrapping of the plans for a Clean Air Zone but, that said, we recognise that Greater Manchester has a Clean Air Plan which is delivering improvements with, amongst other things, the introduction of more electric vehicles and more EV charging points. However, with public health being the underlying factor here, the aspirations need to be higher. The plan should aim to improve air quality – not just to current UK standards (PM2.5 of 20 micrograms per cubic metre) but to WHO standards of 5 micrograms per cubic metre. UK standards are 4 times those of WHO but are on track to be aligned by 2030 which would mean that Greater Manchester will find itself way over UK standards even if it gets to within the current standards. If Greater Manchester wants to be considered a global city region, then it should be leading on global standards.

The Plan has an aim of achieving Vision Zero by 2040. It should be aiming to achieve that sooner. Wales as well as some English local authorities such as Wirral have widely implemented 20mph speed limits. Wales' experience is dramatic – around 30% reduction in road deaths. To not implement such a policy in Greater Manchester would appear difficult to defend on road safety grounds alone. Safer

roads, in turn, make walking and cycling safer which aid public transport as people walk and cycle to and from bus stops and railway stations.

OUR PEOPLE, OUR PLACE

Ambitions

Connected, safe and attractive neighbourhoods is supported and this rightly includes promotion of active travel through urban design. However, for local services to be reachable on foot, land use planning must be integrated into this approach. Similarly for local walking routes to be attractive and safe, natural surveillance should be encouraged through land use planning – for example by smaller plot sizes meaning more frequent doors and windows leading to more active frontages. Urban design guidance including that in Manual for Streets has been promoting this sort of approach for a long time now and it should be incorporated into transport planning. Many roads are blocked off around Greater Manchester usually for traffic management purposes. Many of these could be turned into modal filters at relatively low cost.

Vibrant town and district centres is supported. Waltham Forest, London, has shown how restricting cars and promoting walking and cycling and public transport can improve high streets' viability.

Connections between places across the wider city region generally supported but the Vision Zero target of 2040 should be brought forward. 20mph speed limits can be introduced fairly quickly. The evidence around the reduction in casualties in 20 mph areas is indisputable¹. These measures can be supplemented by engineering restrictions to force vehicles to slow down.

Connections into and around our thriving regional centre - ambition to reduce car usage in the area is supported

Enhancing Greater Manchester's links with cities and places across the UK – supported. For this to work best, there need to be good quality active travel and public transport links at the key intercity train stations as well as plenty of secure cycle storage facilities.

A globally connected city region -

Sustainable movement of goods by water and rail (including Port Salford area as a tri-modal -- rail, water and road -- logistics park).

Need to prioritise public transport. As pointed out, "Though most people access the airport by road, the motorway network currently experiences significant delay at peak times." More roads are unlikely to solve this problem.

Proposed Growth Areas

We support the development of public transport links to these areas, but not further road building. Providing more road capacity is self-defeating. New roads only provide short term relief and lead to increased trips by car. CPRE's evidence document, backing its transport policy, provides proof of this²

¹ <https://www.20splenty.org/briefings>

² <https://www.cpre.org.uk/resources/cpre-transport-policy/>

2. OUR NETWORK AMBITIONS (p.60 -)

Our network ambitions are to be:

Reliable – Reliable journey times and transport services that always turn up and are on time

Integrated – Different types of transport that connect seamlessly and journeys are easy to plan

Inclusive and affordable- A transport network that can be easily used by everyone and has fair and reasonable pricing

Healthy – Helping people lead active and healthy lives (eg. enabling walking, wheeling, cycling and easy access to healthcare)

Environmentally responsible – Reducing environmental impacts from transport such as air, water and noise pollution and carbon emissions

Safe and secure- A transport network that is safe to use (eg. through improving road safety, having well-lit and monitored public spaces and tackling antisocial behaviour

Well maintained and resilient – A well maintained transport network, able to cope with challenges extreme weather or increased demand

Which of our network ambitions are most important to you? Rank 1 – 7 with 1 being the most important and 7 being the least important to you.

Reliable

Integrated

Inclusive and affordable

Healthy

Environmentally responsible – 1

Safe and secure

Well maintained and resilient

Please explain your answer:

It is impossible to rank the ambitions as set out. All aspects listed are hugely important and should be strived for.

The closest we could come to supplying an answer to this question would be to say that if climate change is not made a priority, then the world will not be fit to live in and therefore the top priority has to be 'environmentally responsible'. But, for people to be persuaded to use Greater Manchester's (non-road) transport offerings, they need to see all the other facets listed coming together. The Greater Manchester Ringway walking route is a good example of how active travel improvements lining with public transport can promote health and access to the countryside:

<https://www.cprelancashire.org.uk/discover/explore-the-fringes-of-greater-manchester-on-the-gm-ringway-trail/>

3. OUR POLICIES (page 75 -)

OVERARCHING POLICIES

We will prioritise expansion of, and improvements, to the Bee Network – our joined-up public transport, walking, wheeling and cycling network.

How far do you agree or disagree with this approach? (See policy DP1)

Strongly agree

We will support new development and regeneration with a ‘sustainable modes’ first approach, especially in town centres and our growth areas, including the regional centre. That means provision for walking, wheeling, cycling and public transport will be considered first.

How far do you agree or disagree with this approach? (See policies GP1 and NP5)

Strongly agree

Do you have any further comments on these overarching policies?

Overarching policy **GP1: Growth locations and town centres** should be aiming to promote the use of brownfield land, integrating with land use policies to aid urban regeneration and reduce pressure on greenfield sites important to agriculture, other rural enterprises, recreation biodiversity and wildlife.

Our transport policies set out how we will turn ambition into action. They guide the decisions we make, the projects we deliver and the way we shape Greater Manchester’s transport system for the future.

Overall, how far do you agree or disagree that our transport policies will help to achieve Greater Manchester’s transport system for the future?

Agree

Please provide more information on your answer

By and large, this is a sound set of policies, but there could be some improvements

Network Policy 5 – Land use and new development: should also stress the re-use of brownfield land to aid urban regeneration. Not clear that it should necessarily support the provision of freight handling zones / consolidation centres to meet the needs of service providers as this might depend greatly on their location and whether they are rail or road based but and encouraging appropriate first and last mile journeys for freight is supported.

CPRE welcomes the fact there is a Climate Change Policy (Network Policy 12), albeit succinct, and commends the promise to *“encourage new development and land use patterns that reduce the need to travel by car”* and to *“work with developers to ensure a vision-led approach to deliver well designed, sustainable places that prioritise travel by sustainable modes”* (Network Policy 3, page 80) – and also the aim to *“minimise the impact of transport on the built and natural environment”*, (Network Policy 14).

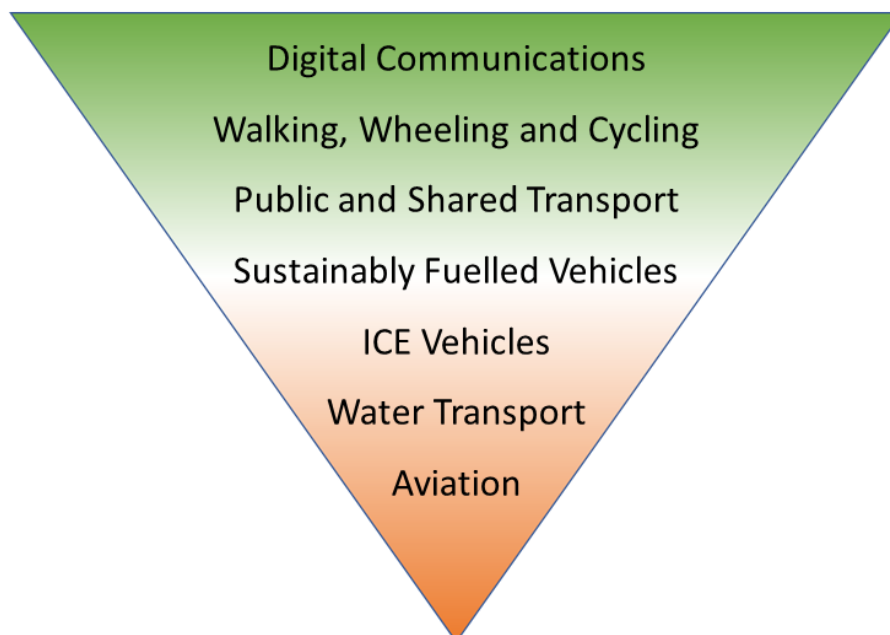
However, Network Policy 11 on 'Pollution' is weak. It needs to promise decent air quality for all.

If carbon targets and improved air quality aspirations are to be met, there is a need for more ambitious car use reduction targets and road freight reductions.

Also, there is a need to not only monitor pollution but to regularly publish air quality information - it should be like the weather forecast/pollen counts so that the people of Manchester are aware of the problem. This will help gain support for alternatives to car travel. and the impact this has on health so that everyone knows what the impact is.

Also, there should be a policy which brings forward the commitment made in para. 1.32 on page 12 to “*end digital exclusion and build connected communities*”. CPRE’s sustainable transport policy places digital communications at the top of its hierarchy: <https://www.cpre.org.uk/resources/cpre-transport-policy/>. See hierarchy diagram below. (N.B. ICE vehicles are internal combustion vehicles).

CPRE Sustainable Transport Hierarchy



NP15 – Vision Zero: generally supported but should include some specifics about 20mph speed limits and school streets and should be more ambitious – 2040 is a long way off so this target should be brought forward.

4. DELIVERY

CPRE **strongly agree** that the policies DP2 – DP 7 help deliver the vision for transport:

DP2: Streets for All

Improving our streets to be welcoming and safe spaces for everyone, enabling more travel by walking, wheeling, cycling and public transport, while creating better places that support local communities and businesses.

DP3: Walking and wheeling

Enabling and encouraging more people to travel actively by walking and wheeling.

DP4: Cycling

Enabling and encouraging more people to cycle.

DP5: Bus services

Improving services and having more electric vehicles to make bus the first choice for more journeys.

DP6: Bus infrastructure

Reducing journey times, improving reliability with more bus priority, and enhancing the accessibility and quality of our bus stops.

DP7: Neighbourhood transport services

Making neighbourhood transport services (like Local Link and Ring and Ride) easier to use

With respect to DP8: Freight and logistics

Supporting sustainable freight and logistics solutions that enable economic growth.

This depends on how 'sustainable' is defined and how economic growth is measured. Many proposed logistics centres are located out of town along motorways encouraging HGV related freight. Newer logistics centres are increasingly automated and employing fewer and fewer people.

DP9: Strategic roads

Coordinating and managing strategic roads (such as motorways) and our local road network together to deliver safer and more reliable journeys.

The best way to make strategic roads and the local road network work better is by reducing the pressure on them by offering alternative forms of transport and by promoting land use patterns that promote non-car/HGV related journeys. Building more roads/relief roads or widening existing roads generally leads to induced demand and promotes land use patterns that are more car dependant thereby worsening the situation.

We would point to the findings of Transport Focus who surveyed road users in 2023 to understand their preferences when it came to investment in motorways and major 'A' roads. The top preference expressed was for projects which improve safety. Also, given the choice of having a large number of small schemes or a small number of large schemes, two thirds of the respondents expressed a preference for a large number of small scale projects: (<https://www.transportfocus.org.uk/publication/road-user-preferences-for-investment-in-englands-motorways-and-major-a-roads/>).

DP10: Planning of key routes and local roads

Planning the road network in a way that is sensitive to local needs and takes all road users into account.

If this leads to people having greater choices and leaving cars at home more often, then it is a good thing. Where active travel infrastructure and public transport are properly promoted through appropriate infrastructure there is evidence that people will do this.

DP11: Management of key routes and local roads

Improving the operational efficiency of our road network – balancing the needs of all users and local communities – to maximise safety, to minimise disruption, improve journey time reliability, and encourage use of active travel and public transport.

As above, the best way to make strategic roads and the local road network work better is by reducing the pressure on them by offering alternative forms of transport and by promoting land use patterns that promote non-car/HGV related journeys. Building more roads/relief roads or widening existing roads generally leads to induced demand and promotes land use patterns that are more car dependant thereby worsening the situation. Reducing road speeds makes them safer for all users.

We would also make the point that, whenever surveys are carried out of the travelling public, their priority is always the maintenance and safety of existing roads, not the provision of new roads. Transport Focus conduct surveys of road users' priorities every few years (<https://www.transportfocus.org.uk/publication/road-users-priorities-for-improvement/>).

DP12: Parking and kerbside management

Managing the supply of parking and our kerbsides in a way that supports the vitality and viability of our town centres, employment and residential areas and other key destinations, while avoiding excessive parking provision that encourages increased car use.

Lessons of Waltham Forest and other shopping centres/High Streets needs to be learnt. Promoting public transport and active travel have the biggest impact on high street vitality and viability and that can mean restricting car use.

DP13: Car clubs

Working with partners to promote the use and availability of car clubs as sustainable and cost-effective alternatives to private car ownership.

Supported. CPRE supports car clubs because evidence shows users make optimum use of the vehicles, planning their journeys better than those with cars that are easily available all the time. Also, having access to car clubs, encourages many households not to invest in second cars.

DP14: Cycle and e-scooter hire

Promoting the use of bike hire and e-scooter hire and ensure that such modes are integrated into the Bee Network.

Supported but needs safe wheeling infrastructure.

DP15: Motorcycles, mopeds and e-scooters

Supporting the use of motorcycles, mopeds, and legal use of e-scooters as part of our transport mix, recognising the need for effective management of these vehicles.

Don't know. Not sure what effective management means in this case.

DP16: Taxis

Working with the taxi industry across Greater Manchester to offer safe and high-quality taxi services from a strong, thriving, and well-regulated sector, which is integrated with the wider transport network.

Support. Taxis can have a very useful role to play in reducing overall car usage, but also in providing shared transport in different circumstances. We are aware that Stepping Hill Hospital in Stockport has sometimes used shared taxi services to deliver patients from similar postcodes for appointments because of parking problems at their site.

DP17: Coaches

Working with operators of coach services to integrate facilities, services, and information into the Bee Network, encouraging them to expand routes and frequencies.

Support

Coaches, like taxis, can have a useful role to play in providing social services and particularly rail replacement services.

DP18: Zero and ultra low emission vehicles

Facilitating and encouraging the transition towards electric vehicles.

Agree

Our streets and roads: further comments

Do you have any further comments you would like to make about our streets and roads policies?

We would like to point to the important long-term research that Transport for London conducted last year which shows that 20 mph speed limits save many lives. They undertook analysis of 150 20 mph schemes implemented between 1989 and 2013 and it showed that the number of people killed or seriously injured reduced by 34% following implementation of the 20 mph speed limits: <https://tfl.gov.uk/info-for/media/press-releases/2025/may/powerful-new-long-term-tfl-research-shows-20mph-speed-limits-save-lives-on-london-s-roads>.

In addition, we would like to draw attention to an excellent joint study carried out by Create Streets and Sustrans in 2024 which resulted in the report: 'Stepping off the road to nowhere'. This piece of work, which was contributed to by the Hampshire Branch of CPRE, demonstrated a different approach to transport planning which did not require the unnecessary paving over of countryside. It should be essential reading for transport planners: <https://www.createstreets.com/projects/stepping-off-the-road-to-nowhere/>.

And we would also like to flag up the many excellent reports produced by:

Transport for New Homes in the 10 years they have existed:
<https://www.transportfornewhomes.org.uk/ten-years-of-transport-for-new-homes/>

the featured publications by the Campaign for Better Transport:
<https://bettertransport.org.uk/resources/research/>

and the many excellent reports and briefings that Transport for Quality of Life have produced:
<https://www.transportforqualityoflife.com/library/>. Their output includes a piece of research they carried out for CPRE in 2017: 'The end of the road, challenging the road-building consensus':
<https://www.cpre.org.uk/resources/the-end-of-the-road-challenging-the-road-building-consensus/>.

CPRE Support the following Rail and light rail Delivery Policies

DP19: Rail integration

Working with Network Rail/Great British Railways (GBR) and partners to bring local rail services into the Bee Network.

DP20a: Regional and national rail services

Working with Network Rail/Great British Railways and rail industry partners to improve reliability and increase capacity on regional and national routes. The initial focus will be on delivering the Liverpool to Manchester section of Northern Powerhouse Rail.

DP21: Existing light rail

Maintaining and improving the existing Metrolink network as an integral part of our Bee Network.

DP22a: Future light rail

Extending the Metrolink network and new stops on the existing network to serve more locations.

DP22b: Future metro

Developing options to provide a significant capacity increase to/across the regional centre, including tunnelled metro options.

DP23a: Transport hubs

Improving transport hubs, interchanges, and connections to make them easier to travel across the Bee Network, and connect with, and between different services.

DP23b: Park and ride

Provision of improved car and secure cycle parking facilities at tram stops and rail stations.

Generally support. For park and ride to replace car usage their location must be carefully considered.

N.B. However, CPRE are only, partially, able to support Northern Powerhouse Rail:

DP20b: Northern Powerhouse Rail

Working with partners to deliver Northern Powerhouse Rail, delivering a new Liverpool –Warrington – Manchester Airport to Manchester Piccadilly line first.

CPRE has expressed great concern in the past about a new rail link between Manchester and Liverpool which routes across the important peat lands of Chat Moss. We also raise concerns about the harm to the countryside and Green Belt that could be caused by the High Legh leg of NPR linking Warrington and Manchester airport. We want to know the route of a new Manchester-Bradford rail line before endorsing it. All options involving new lines would need to be carefully considered having regard to their full range of economic, social and environmental effects.

Our ways of working

CPRE agree with delivery policies DP24 to DP 26

DP24: Travel choices

Improving customer information across all types of transport with campaigns to enable and encourage people to use walking, cycling and public transport for more of their journeys.

DP25: Technology and innovation

Using new technology and innovation to better plan, maintain, and operate our network (e.g. using artificial intelligence to improve traffic flow or using innovative construction methods and materials).

DP26: Collaboration with neighbouring authorities and other organisations

Working to improve cross-boundary connections and coordination of activities.

Agree – could look long term at ticketing cooperation

Overall, how far do you agree or disagree that our transport policies will help to achieve Greater Manchester's transport system for the future?

Generally **Agree**. However, for the Transport Strategy to work it is essential that the aims and policies are integrated into the refresh of Greater Manchester's Spatial Development Framework, Places for Everyone. No guidance has yet been issued for the new Spatial Development Strategies but it is to be hoped that, like the Regional Spatial Strategies, they will incorporate Transport Strategies. Transport policy can guide development to where it would best serve the region. Greater Manchester has very large amounts of brownfield land which should be developed, in line with National Policy, before greenfield sites. This is essential for urban regeneration and most of this land is in and around established urban areas and could help meet housing and business needs and would make public transport more viable by allowing higher densities in areas where that is appropriate.

Potential transport schemes and other actions we could take are shown on maps 1 – 5 and in the tables included in the appendices to the GM Delivery Plan. Please note, these are options and it will not be possible to deliver them all. All routes shown are indicative and subject to further investigation and consultation.

Do you have any comments on the proposals in Map 1 – Deliver?

The rail service, rail access improvements and the Metrolink extensions and additional stops are all welcome, as are the tram-train pathfinders, travel hubs, increases in bus services and active travel and street improvement schemes. However, CPRE have always opposed the Carrington Relief Road and the A57/A628 road scheme. For different reasons, both are totally unsustainable.

We note that the Bee Network already provides connections across Greater Manchester’s boundaries into Lancashire, St. Helens, Warrington, West Yorkshire and Derbyshire (para. 3.58). We hope to see cross boundary connections into Cheshire East soon.

Do you have any comments on the proposals in Map 2: Develop and deliver?

We are pleased to see proposals for more tram-train initiatives, more travel hubs and more rail station improvements in addition to many more bus services and active travel schemes. Whilst there may be a case for some road junction improvements, (we note the comment in para. 3.30 that the M60 Eccles Interchange is one of the top 10 congestion hot spots in England), we do not support the new roads.

Do you have any comments on the proposals in Map 3: Explore and develop?

CPRE have always opposed the concept of a Stockport North-South Bypass and a High Lane-Disley Bypass. Such schemes only ever provide short term traffic relief and encourage more road trips. Our transport policy and the background evidence to it which explains our thinking more fully is here: <https://www.cpre.org.uk/resources/cpre-transport-policy/>.

Do you have any comments on the proposals in Map 4: Regional centre?

We remain to be convinced about the proposed underground rail station at Piccadilly, which would be dependent on miles of tunnelling beneath heavily built-up areas in order to connect to the surface rail network but we commend plans for the continued expansion of the Bee network.

Do you have any comments on the proposals in Map 5: Bee Network Rail?

We very much support the opening of a new railway station at Cheadle, plans to increase Manchester Airport stopping services and the other Bee Network rail proposals.

Do you think anything important is missing?

Yes -

No

Don't know

If yes, please provide more information on your answer:

There are no plans for networks of quiet lanes (on-road routes) and/or greenways (off-road routes) – for walkers, cyclists and horse riders.

5. ANY GENERAL COMMENTS OR SUGGESTIONS

Do you have any general comments or suggestions that haven't already been covered in your previous responses about Greater Manchester's Transport Strategy 2050 and Delivery Plan?

There is a (very succinct) climate change policy but, apart from that, the lack of emphasis on climate change in the document is worrying. Transport is a major contributor to climate change. It is responsible for more than a third of CO2 emissions. It is therefore not appropriate to plan for more highway capacity other than in exceptional circumstances where there is a strong safety case.

We note the promise (yet again) of plans for an expanded role for the Manchester Ship Canal. This appears in strategy after strategy and we always welcome the concept. However, as usual, there is nothing specific and no time line.

Also, we have concerns about the vagueness of southern growth locations – around the airport which appear to run into Cheshire East (para. 4.20), and 'new road links and/or additional road capacity' which it is stated will be needed 'in some locations' around the western gateway (para. 4.26, page 48). It is unclear what the proposals are and how Green Belt would be affected.

ABOUT YOU

Other

If other, please specify

The Campaign to Protect Rural England is an environmental non-governmental organisation.