



CPT Response to 'Draft City Centre Transport Strategy To 2040'

Introduction

The Confederation of Passenger Transport UK (CPT) is recognised by the Government as the UK trade body for bus and coach operators with in excess of 90% of bus fleet, and 70% of coach fleet within its membership numbering around a thousand business members.

We welcome the opportunity to respond to the consultation and acknowledge the ambition of the strategy. It is in the interests of all partners to ensure this is delivered collaboratively and with the full support of transport operators to ensure the ambition is fulfilled.

This requires acknowledgment and consideration of the points raised by operators, directly and also via CPT in this submission, and from operators association One Bus. Collaboration has to be improved with operators as there have been concerns from operators on engagement, there is an opportunity to correct and build upon the relationship moving forwards.

Executive Summary

CPT welcomes the ambition in the draft strategy and both bus and coach operators share the longer term ambition and the targets on passenger growth and traffic reduction.

In order to reach the stated aims, there are some valid practical concerns and considerations which must be worked through, operators must be seen as a major stakeholder and partner in developing any proposals into reality.

We set out concerns in relation to the specific proposals through the document and also set out in broad terms how buses and the wider public transport network can further benefit the economy and people of the City region.

The visitor economy in pre and post COVID times is an increasing market for Greater Manchester and the Coach Industry is a major contributor to the visitor economy and group travel and should be seen as part of the wider transport mix with supportive facilities.

Response on the Ambitions to Deliver the Vision

CPT supports the wider ambition of the vision for 90% of morning peak trips into the city centre to be made on foot, by bicycle or public transport before 2040. The vision also references rebalancing street space to enable walking to be the main mode of travel. A key component of using valuable City Centre space efficiently to promote public transport and active travel is to

remove or severely reduce car congestion – in doing so provides more options for more attractive public realm.

The rebalancing intention should take into account the space needed to accommodate buses and passengers safely, sufficiently and comfortably – and also the attractive public realm walking access between key bus stops/interchanges and City Centre destinations. It is appreciated that all modes require walking at some stage of the journey, but at the same time not all people can walk longer distances the case study on page 5 provides a useful example of negative effects of longer walking distances.

Increased use of cycling can result in reduced numbers of cars on our roads and this ambition is welcomed if progressed in a way which does not negatively affect bus flow or passenger safety and experience. Segregated cycle lanes where space is available can be more user friendly and it is appreciated this is not always possible. Using the right highway design, buses (driven by professional and highly trained drivers) and cyclists can safely co-exist and the removal of car traffic further provides a safe and efficient highway.

CPT agrees wholeheartedly with the ambition that the City centre benefits from better transport connections and this can be true across all public transport modes. Efficient interchange opportunities provide a wider benefit and can reduce longer distance as well as short distance car use.

For example efficient and comfortable interchange between bus or Metrolink and longer distance coach or rail services can challenge and provide a viable alternative to longer distance car use. The same is true for local and regional interchange. We do have concerns that some of the specific proposals discourage interchange opportunities.

Overall journey time by bus must be broadly comparable or even better than the journey by car. Bus priority at key points of the City highway network can provide not only an important actual time saving, but a very visible comparison for motorists still waiting in congestion as a bus travels past with priority.

The stated ambition of reducing car parking is welcomed but requires more detail. As well as reducing the actual number of spaces which would be most preferable, other examples elsewhere which could also be used for reduced numbers of spaces to reduce demand include using price as a discouraging element. Nottingham has introduced the Workplace Parking Levy which could be considered.

Park and Ride Schemes are used effectively in Greater Manchester and elsewhere allowing motorists a degree of freedom outside of more congested areas. Operators have suggested that locating car parks just outside the Inner Relief Road, enabling interchange to other modes would discourage driving into the Central Area. Reducing on street parking bays reduces the number of potential destination parking opportunities for cars and also frees up valuable highway space for more efficient use of space fulfilling the wider ambitions of the City Centre Strategy.

Improvements can be made by having more off-peak deliveries from low emission smaller vehicles that have sufficient space to park without blocking the highway. The establishment of access loops will reduce the amount of general traffic and delivery vehicles that are crossing the city rather than accessing it.

Bus operators are highly innovative in their approach and offer to passengers which includes smart ticketing, contactless payments, real time apps and in some vehicles, provision of Wi-Fi and USB charging points further enhancing the journey experience on modern clean buses.

The waiting environment should be similarly innovative in providing a level of shelter and comfort as well Next bus Real Time information comparable with Metrolink. The 'on board' experience is currently of good quality and this should be matched by the overall experience including journey time which to deliver may require an innovation of thinking of how to deliver.

The Wider Role of Buses

Buses are the most efficient use of road space. Buses are also the largest provider of public transport journeys into the City, so measures which provide greater priority and additionally help tackle congestion are essential and overdue, and they will enable bus operators to deliver even better journeys for passengers and make public transport a viable choice for more users.

Prioritising road space for buses to ensure a fast and consistent journey time is essential to encourage people to make the switch to more sustainable and environmentally friendly forms of transport. To further restrict bus access and terminating options in the City Centre would be a retrograde step.

CPT would highlight that buses are part of the solution in further reducing unnecessary traffic from the City Centre and improving air quality. To ensure buses are attractive for passengers and fulfilling viable modal shift, it is important buses are able to reach the parts of the City where passengers want to travel to, and that the infrastructure provides an accommodating and comfortable environment for buses and more importantly their passengers.

Specific Response to the Proposals

Oldham Street Loop

The Oldham Street Loop provides good convenient access to the City Centre retail and hospitality/leisure core for services from the North of the City. Whilst the public realm and waiting environment isn't of high quality and can be improved upon, the convenience of the location to passengers is clear.

Moving stops and consequently passengers further away to Dale Street or to other nearby streets will have a dis-benefit to most passengers and increase overall journey time when walking to a final destination is taken into account.

We are also concerned of the risk of moving busy bus stops closer to residential premises which is likely to have a detrimental impact and response from City Centre residents.

Whilst there is no immediate alternative proposal as yet, CPT would object to the Policy principle of closing this important City Centre access.

Parker Street

Parker Street acts as a popular interchange and provides convenient access to the City Centre retail and leisure core. In addition, its location next to Piccadilly Gardens Metrolink stop allows for convenient cross mode interchange.

Whilst not a bus station in the conventional sense, its layout and easy means of interchange provides a convenient centre hub for services and passengers in this location.

Parker Street in the main daytime period accommodates just over 100 bus departures per hour. If Parker Street was to close, and the ambition of an increase in patronage of 50% is to be achieved – where does the City Council propose to accommodate the buses and the passengers?

CPT objects to the proposal of closing Parker Street and any alternative would be deterioration of available space, passenger waiting facility, interchange opportunities and likely to create further congestion if stops are moved. The potential public realm improvements that would be possible by removing buses would be highly limited when Metrolink lines still run through the Street.

Increased use of Shudehill Interchange

We note the desire to increase utilisation of Shudehill Interchange and also the acknowledgement of congestion on adjacent roads and its need for reconfiguration.

We understand (from TFGM) that the interchange is at full capacity and previous requests to fun Metrolink replacement services into the interchange have been denied due to insufficient slots.

CPT does not have sufficient detail to support increased use of the Interchange based on its current capacity constraints.

Reducing the Number of Terminating Services

We acknowledge the consideration given to the desire to increase Cross City services and as a consequence reduce the number of terminating services thus freeing up road-space required for layover.

Whilst this can be a legitimate consideration, the potential negative impacts of increasing cross City services must be taken into account. Delays caused by congestion or incidents on cross City services can then have a much wider impact across the City and impacts far greater passengers. Any such aspiration should be worked in very close detail with operators and the points in the below section taken into account.

We are also unclear at the desire for 'less bus services running all the way into the Centre.' Bus design and the bus network provide services where passengers would like to travel to and in most cases this is to the City Centre. Whilst bus operators will always be happy to engage with local authorities on the bus network and highway provision/public realm, passenger journey times and desired travelling patterns must be taken into account.

Review of Coach Parking

We welcome this review and would ask this is done in co-operation with CPT and its members. We have recently submitted a paper to Manchester City Council in support of off street coach

parking returning to Sheffield Street which is included as an addendum. Broader aspects of this paper are included from page 6 in this document.

Wider City Centre Traffic Control and Resilience

There is an urgent need and benefits to the City in reducing congestion and car use, thus improving air quality and benefiting the economy of the City. To unlock this, buses must be able to take passengers to the heart of the City and car usage be further constrained.

As a mode comparator, car owners parking in the NCP Car Park at the Arndale Centre (creating congestion in the heart of the City) have the ability to walk straight into the respective shopping centre whilst moving nearby bus stops would result in a further walking distance for many passengers using local bus services.

In addition, other nearby car parks including NCP Piccadilly Plaza (160 spaces) and NCP Piccadilly Gardens (712 spaces) provide broadly similar City Centre access for motorists compared to bus passengers.

The City must review existing parking provision and location of car parks. The introduction of high quality, frequent, park and ride schemes would provide significant benefits and would enable the Council to free up City Centre space and reduce dependant traffic flows.

The resilience of the City Centre Highways Network, if the proposals are followed through, is not good enough to withstand even minor disruptions.

In recent times there has been the loss of key routes such as Market Street, High Street, Mosley Street, Cross Street, and Corporation Street along the recent changes affecting Deansgate, Blackfriars Street, Withy Grove and Victoria Street.

To ensure customers are able to still get to the city centre, operators have been forced to channel bus services into the limited available roads raising concerns that there are too many buses. To achieve the target passenger numbers, more road space and in particular kerb space needs to be provided, not less.

The Public Sector Equalities Assessment we understand has been done in draft form and will be firmed up as proposals are implemented, the views of passengers and relevant user groups should be considered as part of any analysis into such outlined measures.

Comparable Case Study

Blackett Street in Newcastle provides a direct East West connection through the City Centre and a means of easy access towards Eldon Square Bus Station. It is attractive for the flow of buses into, and out of the City Centre resulting in the passenger experience of a direct connection to the heart of the City.

Demonstrating this, Intu Eldon Square studies illustrate that of its annual footfall of 37 million, around 75% utilise public transport to access the centre. The importance of public transport in delivering these customers cannot be underestimated.

Blackett Street accounts for over 12 Million passenger journeys per year, which is more than double the annual passenger count for the nearby Monument Metro Station. Newcastle City

Council has a long term aspiration to close and pedestrianise part of Blakett Street which would result in closing bus access.

During summer 2018 and 2019 the street was closed to traffic during weekends in the summer as an experimental closure and to support City Centre events, the street was also closed from November 16 until December 28 2019, to accommodate a Christmas Market and 30m toboggan slide.

Although temporary, the alternative arrangements increased mileage for buses, increased walking distances to parts of the City Centre and severely degraded the passenger experience with multiple bus services sharing single stops without shelter causing congestion on very limited pavement space.

Independent research from bus users UK showed that 71% of surveyed bus passengers are opposed to the permanent closure of Blakett Street.

Indeed there had been a clear demonstration of passenger decline during the experimental closures as Stagecoach North East figures show below.

For the 2019 festive closure, the year-on-year reduction in public transport usage was -19.0%. Segregating data to concessionaires only, the fall was -22.4%. This is more than 31,000 elderly and disabled concessionary trips which had been lost from the city centre.

The bunching of a myriad of City Centre bus services through limited corridors caused wider impact on reliability not just on the displaced services, but the additional traffic also disrupted other services. Anecdotal evidence suggested that simple instances of badly or illegally parked delivery wagons or taxis in bus stops hindered a significant degree of the City Centre network for short periods but with far wider prolonged effect.

We would suggest the impacts (albeit temporary but are proposed to be permanent) experienced in Newcastle chime very closely with the potential impacts of the specific proposals in the Draft City Centre Strategy.

Coach Parking Review

CPT has submitted (and included with this document as an addendum) a separate paper on reinstating off street Coach Parking to Sheffield Street. Broader aspects are extracted below:

The Role of Coach

Understanding the volume of coach travel (irregular services or visits) into and around Manchester, and knowledge of the economic benefits they bring is an important aspect of considering the positive economic benefit of quality coach parking facilities. The Government's Air Quality Plan makes specific reference to regional coach operators and the benefits they can offer in reducing congestion and associated emissions and this is especially relevant when Greater Manchester is considering the implementation of a clean air zone.

Coach travel plays a vital and often underappreciated role in transporting people around the country every day. Coaches provide a comfortable, environmentally sustainable way of transporting huge numbers of visitors around the country. They support our tourism industry, with domestic and international visitors who travel by coach contributing over £6 billion to the UK

economy each year. They transport hundreds of thousands of children to school each day, ensure people can still get where they need to go during rail engineering works, and provide those who might otherwise struggle to travel with a safe and easy door-to-door travel option.

The coach is one of the most environmentally friendly ways of travelling, with average carbon dioxide emissions per passenger per journey being around 1.5 times higher for rail, 5 times higher for air and 6 times higher for car travel.

The role of the Coach cannot be underestimated to the regional economy and to improving air quality.

All too often local authorities are failing to properly consider provision for coach travel as a sustainable form of transport that can ease congestion and air pollution by reducing traffic. Coach travel to visitor attractions is frequently hampered by poor access, lack of suitable drop-off/pick up points, lack of coach parking and general coach facilities.

This can lead to increased car use, with associated congestion, car parking and air pollution issues, and in some cases can even restrict visitor numbers. When coaches have to travel considerable distances away from their destination to park, vehicle emissions and driver hours are increased and driver rest time is curtailed. These factors sometimes result in coaches parking in residential areas with a negative impact on the relationship between coach operators and local people.

Current Coach Parking Provision

Current coach parking provision in Manchester is sub optimal and does not provide sufficient facilities befitting the stature of the City, its ambitious plans or recognising the benefits and uses of coaches as listed above. Presently, coach drivers have to make the most of opportunities and spaces available and relying on local knowledge which incoming drivers will not always have.

Relevant Policy References

Page 57 of the Greater Manchester Transport Strategy 2040 recognises the benefits of coach:

‘Chartered coaches play a vital role in Greater Manchester’s visitor economy, bringing people in to visit shopping centres, leisure and cultural attractions and to attend a wide range of events. Visitor numbers are growing, and we will work with operators and local authorities to ensure that coaches can set down and pick up close to their destinations and that accessible coach parking locations, with appropriate facilities and hours of operation, are provided and well signed.’

Policy 24 States: ‘We will seek to ensure that accessible coach parking and set down/pick-up points are available at key locations. (Page 57). In addition, the Transformation of Piccadilly Hub refers to ‘Improved bus and coach access’ on page 87.

In Conclusion

We welcome this review and would ask this is done in co-operation with CPT and its members meeting the committed policy objectives and recognising the value of coach as a mode.

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