

1. Introduction

This document is Chester Cycling Campaign's response to the public consultation on the draft Local Transport Strategy (LTS) for Cheshire West and Chester (CWaC). We have provided comments and suggestions on the chapters of the draft Strategy that contain policies. Our comments and suggestions are limited to those aspects of the draft LTS that relate to cycling.

Overall, we welcome the general direction that runs through many sections of the draft Strategy towards promoting more sustainable forms of transport and that the draft Strategy recognises the multiple benefits that this can bring. However, we believe this can be furthered by embracing the '20's Plenty where people live' concept that is being employed so successfully in other towns and cities. Reducing the speed limit to 20mph for whole residential areas is proven to be a very successful and cost effective way of reducing accident rates and encouraging walking and cycling. Implementing 20mph zones in residential areas would help to achieve many of the objectives of the LTS by reducing accident rates and making streets safer; encouraging more active and healthier ways of travelling; reducing traffic and therefore reducing congestion and air emissions; and, improving the quality of life for residents. All this can be achieved with minimal impact on overall journey times and at low expense with very little new infrastructure.

We look forward to working with CWaC over the lifetime of the LTS to help realise these ambitions and those of Vision 2050.

2. Comments on Section Four – Supporting Economic Growth

2.1 General Comments

Section 3 'Setting the Challenge' acknowledges that congestion is a significant problem in the Borough, and that there are increasing levels of car trips undertaking relatively short journeys which contributes to this congestion. Section 3.9 outlines that CWaCs approach to tackling congestion will be to make best use of the existing network, including measures to promote the use of more sustainable modes of transport. This general approach is welcomed by Chester Cycling Campaign. Cycling is one mode of sustainable transport that is ideal for short journeys and as such should be promoted as part of CWaCs approach to tackling congestion.

However, the approach to providing the facilities to promote more sustainable transport, including cycling, appears to be limited to using planning consents and obligations to obtain developer contributions to deliver appropriate infrastructure and services. Although this is understandable given the current financial circumstances, there is a real danger that any new infrastructure and services that are achieved using this approach will only deliver localised benefits, and will not result in the fully connected network that is needed for a modal shift to more sustainable transport.

It is also disappointing that there are no targets set by the 15 Year LTS for the modal shift that is needed to tackle congestion and the economic and environmental problems that it causes. This means that there is no structure against which CWaC can monitor the success of their policies over the Plan period. For example, targets for reduced car use, and for increased public transport and cycling use, need to be set for the whole 15 year period. From this, sub-targets for each 3 year implementation plan can then be set. Detailed measures can then be developed to work towards meeting these targets.

CWaC will need to develop the 3 year implementation plans to ensure that the provision of infrastructure and services to promote cycling and other sustainable modes of transport are provided in a coherent and integrated fashion.

2.2 Specific comments and suggested changes

Section/Policy	Comment	Suggested Changes
3 – Setting the challenge	As well as detailing existing conditions about network usage and congestion, this section needs to establish the challenges that CWaC is to set itself over the next 15 years. The LTS document recognises that there is a need to move away from single occupancy car journeys to more efficient and sustainable modes of transport, but does not set any targets for achieving this. One simple way of setting targets would be to base them on reversing the trends in changing transport modes that have happened over the past 30 years. As well as Borough-wide targets (see Suggested Changes for examples) sub-targets may be needed for urban and rural areas, based on more local baseline data.	Add targets for a modal shift over the 15 year life time of the Plan, using baseline data including that presented in Section 1 of the LTS. E.g. Reduce % of journeys to work made by car from 78% to 60% (down to 1981 levels). E.g. Increase % of journeys to work made by bicycle from 3% to 6% (up to 1981 levels).
8 – Policy proposals	No commitment is made to improve, or support proposals to improve, cycle facilities at railway stations or on trains. Such facilities at stations include bike racks, bike lockers, and means of moving bicycles safely between platforms. Facilities on trains include sufficient provision of areas to stow bicycles, with support from TOC operating policies to encourage use of trains by cyclists. The provision of good facilities for cyclists will reduce the need for commuters to drive to railway stations.	Add additional policy: <i>“Work in partnership to improve facilities for cyclists at all railway stations and onboard all trains”.</i>
8 – Policy proposals	The focus of the policy to “Support measures to increase car parking at key railway stations” is overly narrow and counter-intuitive given the recognition made previously that there are increasing numbers of short journeys made by cars, and that these journeys contribute to the significant levels of congestion in the Borough. Rather, the LTS should work towards overall increased accessibility to railway stations: cars will always play a part, but increasing access by all modes of transport needs to be encouraged.	Reword policy to: <i>“Support measures to increase the accessibility of railway stations for commuters by all modes of transport”.</i>

3. Comments on Section Five – Tackling Climate Change

3.1 General Comments

We welcome the recognition that ‘smarter choices’ initiatives and travel planning will be important aspects of transport planning over the next 15 years, and the policies to develop and promote these approaches. We also welcome the general theme that runs through this section of a move towards more sustainable modes of transport, including cycling. However, there needs to be more explicit links to some aspects of the work that has been ongoing for under CDT to ensure that what has been started is continued into the future to realise its full potential.

3.2 Specific comments and suggested changes

Section/Policy	Comment	Suggested Changes
5.14	Chester’s CDT status will likely be finished by the time the LTS comes into force, so the wording needs to reflect this.	Change sentence to “ <i>Chester was successful in gaining CDT status between 2008 and 2011 and this secured funding to deliver...</i> ” Other sentences and bullet points also need to be changed to past tense.
5.14 and 5.15	No mention is made of the Permeability Study / Cycle Masterplan carried out as part of CDT. This should be a key piece of work to guide future works to promote cycling.	Add reference to the Permeability Study under 5.15. “ <i>A Permeability Study has also been completed that identifies where improvements need to be made in the future to increase cycle access to Central Chester</i> ”.
5.16 – final sentence	This sentence, and the lack of equivalent sentences in other parts of Section Five (e.g. Walking) and the wider LTS, suggests that cyclists are the only users of highways and shared paths that do not obey laws and are inconsiderate. We do not deny that there are a minority of inconsiderate cyclists, but the same point can be made for all user groups. Enforcing the law should not be a Strategic policy: this is something that CWaC should be doing for all highway users as a matter of course.	Delete sentence and replace with: “ <i>It is also recognised that there is a need to tackle the small minority of users of shared paths and highways who use these facilities inconsiderately.</i> ”

Section/Policy	Comment	Suggested Changes
5.17 – Policy 1	<p>We welcome the recognition that local cycle routes need to connect together to provide regional and national infrastructure. This will require working with neighbouring authorities, and this policy could be strengthened by explicitly address this.</p> <p>Particular areas where improvements are needed include links from the Wirral and from Eastham to Ellesmere Port, and to Flintshire around the Dee Estuary NCN Route 89 which is partly lost at the moment.</p>	<p>Amend policy to: <i>“Improve local linkages to the National and Regional Cycle Network and work with neighbouring authorities to provide coherent cycle networks, including completion of the Sustrans Connect 2 project, improving links from the Wirral and from Eastham to Ellesmere Port, and improving links to Flintshire around the Dee Estuary.”</i></p>
5.17 – Policy 5	<p>The opportunities to improve cycle access to central Chester have already been investigated through the Permeability Study / Cycle Masterplan carried out as part of CDT, so there is no need for this to be repeated. However, there is a need for this study to be made public and for its findings to form the basis for a programme of works over the LTS period. We realise that funding over a 15 year period is unpredictable, but this should not prevent the aspiration to work towards the final plan being reflected in LTS policy.</p> <p>Previous work also identified a need to improve access across the River Dee: one of two possibilities is still being actively worked on, but the Curzon Park Bridge has been put on hold. However, future opportunities may arise and the aspiration to provide improved and traffic-free access for pedestrians and cyclists across the river needs to be reflected in the LTS.</p>	<p>Delete “Chester” from this policy.</p> <p>Add a new policy: <i>“Identify opportunities to implement the recommendations of the Chester City Centre Permeability Study.”</i></p> <p>Add a new policy: <i>“Continue to investigate opportunities to provide new and improved cycle and pedestrian access across the River Dee.”</i></p>
5.17 - Policy Proposal 7	<p>Same comments as for 5.16 (above).</p>	<p>Delete policy and replace with: <i>“By educational means, seek to raise awareness of how all users of shared paths can help to ensure the safety, comfort, and enjoyment of others.”</i></p>
5.17 – General policy proposals	<p>There is no mention of inspecting and maintaining the quality of cycle paths – this will be important if existing and new cycle paths, including the network of ‘coloured routes established under CDT, are to be used to their full potential.</p> <p>There needs to be integration between this and inspection and maintenance of highways (where cycle lanes are on the road) and footpaths (where there are shared use paths).</p>	<p>Add new policy <i>“Inspect and maintain cycle paths and shared use paths so that they are maintained at a quality that is suitable for their safe use”.</i></p>

4. Comments on Section Six – Managing and maintaining our assets

4.1 General Comments

The general thrust of section 6 is to be welcomed especially the recognition that the maintenance of pavements and cycleways needs to be improved. The LTS should note that the reduction in car use will reduce the wear and tear of the highway network. As well as cycling and walking being low cost transport measures they are also cost effective and improve other health and well being indices.

CWaC will need to develop the 3 year implementation plans to ensure that the provision of infrastructure and services to promote cycling and other sustainable modes of transport are provided in a coherent and integrated fashion.

4.2 Specific comments and suggested changes

Section/Policy	Comment	Suggested Changes
Part 4	Lighting on cycleways should be explicitly mentioned in the policy proposals. The policy should be stronger to aim for white lighting and low energy use.	4.13. Add new policies: <i>“Improve lighting on cycleways and reduce light pollution and energy used by lighting by replacing sodium with high pressure sodium or equivalent low energy lighting.”</i>
Part 4	Drainage on some cycleways is not sufficient and results in damage of the surface; this needs to be recognised.	4.17. Change to: <i>“Develop a detailed drainage inventory including cycleways...”</i>
Part 6	The inspection of footbridges should be in the policy proposals.	6.10. Add a new policy: <i>“Ensure footbridges are safe and well maintained.”</i>
Part 8	Signage and minimisation of disruption should explicitly mention work on cycleways.	8.4. Add a new policy: <i>“Minimise, sign and publicise diversions on cycleways and pathways.”</i>

5. Comments on Section Seven – Safety, security and health

5.1 General Comments

We welcome the drive to reduce pedestrian and cyclist serious injuries and deaths. However, this must be done by increasing numbers and improving the safety for pedestrians and cyclists, and not by discouraging walking and cycling. One way of reducing pedestrian and cyclist injuries would be to implement blanket 20mph zones in residential areas. This '20s Plenty where we live' concept is being used successfully in other towns and cities. For example, in Portsmouth the introduction of 20mph speed limits on a wide scale without traffic calming resulting in a 22% reduction in casualties. Research has also shown that for any given expenditure, 20 mph limits with signage are 7 times more cost effective than 20 mph zones with humps, and that isolated 20mph streets with traffic calming are more likely result in driving faster outside of the restricted zone.

CWaC will need to develop the 3 year implementation plans to ensure that the provision of infrastructure and services to promote cycling and other sustainable modes of transport are provided in a coherent and integrated fashion.

5.2 Specific comments and suggested changes

Section/Policy	Comment	Suggested Changes
Part 3	The text on road safety does not include any information about the use of 20mph zones in residential areas. The draft LTS states that "Road Safety is one of the Authority's top priorities for action" and recognises that "Almost 85% of road collisions in West Cheshire occur on the locally managed network". 20mph zones in residential areas have been used in other towns and cities to reduce casualties with a great deal of success, and have many other advantages (see above).	Add a new Paragraph as 3.9: <i>"Many Local authorities are now committed to, or are trialling, 20 mph as the default speed limit for residential streets with populations, including Warrington and Wirral. Research shows that these zones are a cost effective way of reducing casualties whilst having minimal effect on overall journey times."</i>
Part 3 – Education and awareness: Policy 1	Education and awareness should particularly focus on cycle and pedestrians.	3.24. Add to first policy: <i>.....road safety awareness campaigns. These will emphasise good practice to safeguard cyclists and pedestrian safety in driver safety campaigns.</i>
Part 3 - Enforcement and speed management: Policy 1	See above comments on 20mph zones.	Add a new policy under Enforcement and speed management: <i>"Trial 20mph as the default speed limit for residential streets with populations as part of the Speed Limit Review, and make 20mph zones part of the Council's Speed Management Strategy if proven to be successful."</i>

Section/Policy	Comment	Suggested Changes
Part 4	Activities to improve health and promote healthier lifestyles need to be integrated across departments to be successful.	4.5 - Add new policy: <i>“Co-ordinate activities such as smart travel plans, bikeability and cycle training and development of cycle routines with other relevant state bodies and Council departments such as health, environmental, education and leisure.”</i>
Part 6	Use increasing cycling and walking to reduce air pollution in urban areas. This links back to the 20 mph zones advocated previously, as reducing speed limits in residential areas encourages walking and cycling	6.12 - Add new policy: <i>Encourage cycling and walking especially in the planning and design of new developments to reduce air pollution in urban areas.</i>

6. Comments on Section Eight – Promoting Equality of Opportunity

6.1 General Comments

This section examines access to services and employment, particularly for disadvantaged communities. However no mention is made of the potential role of cycling as a low cost method of transport with few entry barriers (such as need buy a car or to know how public transport networks operate) in encouraging access. Cycling could have a significant particular role as part of an integrated journey - for instance Ellesmere Port has good rail links to Liverpool, and Northwich to Chester and Manchester. Provision and promotion of good cycle parking and access routes would allow people in these deprived communities to access jobs and services. The best way to do this would be through a 'Station Travel Plan'. The Association of Train Operating Companies' (ATOC) has funded a national pilot programme (<http://www.stationtravelplans.com/>) which is yielding promising results. The pilots, of course consider access by all sustainable modes including walking, bus and demand responsive transport. They work best at well used station with pressure on car parking. The nearest pilots are Shotton (Flintshire) and Hazel Grove (GM)

Even better, cycling comes at a low cost to the council, with the 'subsidy' per journey (in terms of cycle routs, parking and promotion) substantially less than some mainstream transport such as subsidised bus services and Demand Responsive Transport. And of course cycling has significant health benefits and therefore helps the Council meet other community objectives.

6.2 Specific comments and suggested changes

Section/Policy	Suggested Changes
Section 4	Add statement: <i>“Cycling is a low cost method of transport with few entry barriers such as need to buy a car or to know how public transport networks operate. It can therefore have a significant role in encouraging access to services and employment, particularly for disadvantaged communities. This could be as direct access, for instance to a place of employment, or as part of an integrated journey such as to a rail station.”</i>
Section five policy proposals second bullet point	Add additional text: <i>“taking account of the cost to the user and entry barriers”</i>
Section 6	Add new sub heading and text (after 'bus information'): <i>“Cycling and Walking</i> 6.xx The Council recognises that <i>Cycling is a low cost method of transport with few entry barriers, but substantial health benefits and as such is ideal to expand access to employment and services, including as part of an integrated journey with public transport. It is also relatively cheap to the public purse when compared to some methods of transport such as Demand Responsive Services.</i> 6.xx <i>In most CWaC communities cycling is at a relatively low level compared to similar areas elsewhere in Britain and northern Europe and therefore has huge potential to provide additional access, promote equality of opportunity and better health in deprived or less accessible communities.”</i>

Section/Policy	Suggested Changes
Section 6	Add into 'Policy proposals' box': <i>“Cycling and Walking</i> <ul style="list-style-type: none"> • <i>Consider the potential for cycling and walking to increase access to employment and services particularly in deprived urban communities, including as part of an integrated journey with public transport</i> • <i>Consider creating Station Travel Plans where these would promote improve access. The following station are considered most likely to benefit from a station travel plan: Ellesmere Port, Hooton, Chester, Northwich.”</i>
7.3	Add additional text: <i>“Access routes to stations that are easy and safe to navigate are as important as well. These can be addressed through Station Travel Plans.”</i>

7. Comments on Section Nine – Improving Quality of Life

7.1 General Comments

Most of the small historic cities that Chester considers itself to be competing with such as York, Cambridge, Bath etc, have levels of cycling that are much higher than Chester. Communities that have the best quality of life also tend to have high cycling levels, including many in the Netherlands and Belgium that have the same demographics as communities within West Cheshire such as Ellesmere Port and Northwich. This is because higher cycling levels in urban areas are likely to lead to less congestion, noise and air pollution, together with a healthier population and therefore better quality of life for residents and visitors.

The role of Chester Cycle Demonstration Town is only mentioned in 6.4 in its role in developing Greenway links. This continues the general perception in the Council that CDT is about building Greenways, while arguably it's most valuable contribution to improving quality of life is promotion of cycling and encouragement to potential cyclists.

Sections 4.7 and 4.8 correctly highlight the importance of design in creating multi-user transport corridors. In Chester City Centre cycles share pedestrianised areas outside peak times without any reported problems, as they do in many continental towns such as Strasbourg. Given the benefits of cycling to quality of life in general, it is a logical step to allow cyclists to share areas with pedestrians at all times in the Chester city centre as a trial.

Section 4.1 only mentions air quality in passing as damaging buildings and disturbing animals (a mistake?), but although the CWaC area largely meets National Air Quality Standards, there is no room for complacency, particularly for rural ozone and urban oxides of Nitrogen. Air Quality is a key factor in the attractiveness of an area both for tourism and inward investment.

In section 6.9 poor links between Chester and Ellesmere Port are identified as an issue. There is an existing completely off-road route along the canal that could be upgraded at minimal cost. This should be included as a firm proposal.

7.2 Specific comments and suggested changes

Section/Policy	Suggested Changes
Section 1	<p><u>Add statement:</u></p> <p><i>“Many of the areas with the best quality of life also have attractive conditions for cycling and walking, and in particular have high cycling levels. The Chester Cycle Demonstration Town project (Chester Cycle City) has shown how the quality of life for residents can be improved through a combination of infrastructure improvements and low cost promotion of cycling and encouragement to potential cyclists. The existing CDT programme is coming to an end and there is a need to both spread the lessons of phase 1 from Chester to other communities within CWaC, and to ensure that the benefits of cycling to the economy and quality of life continue to be promoted through a successor programme. This would also pick up unfinished items from phase 1 related to quality of life, including implementing the city centre cycle permeability measures.”</i></p>
Section 3	<p>Add new sub heading and text:</p> <p><i>“Air Quality. Although the CWaC area largely meets National Air Quality Standards, there is no room for complacency, particularly for rural ozone (which are increasing) and urban oxides of Nitrogen which remain high in many areas. Air Quality is a key factor in the attractiveness of an area both for tourism and inward investment.”</i></p>

Section/Policy	Suggested Changes
Section 3	<p>Add 'Policy Proposal</p> <p><i>“Work to reduce local air pollutants in areas where this is a problem by a package of measures including restricting vehicular access, lower emission buses and higher levels of cycling including increased cycle permeability in the centre of communities.”</i></p>
4.7	<p>Add new point after 4.7:</p> <p><i>“Cycles are allowed to share pedestrians areas in Chester City Centre outside peak times, and there is no conflict between pedestrians and cyclists, either in Chester, nor in Darlington where cyclists are allowed to share with pedestrians in the town centre at all times. It is common for cyclists and pedestrians to share spaces at all times in continental towns (such as Strasbourg) at all times. Given the benefits of cycling to quality of life in general, it is a logical step to allow cyclists to trial this approach initially in the city centre, and then in other pedestrians areas in CWaC should this prove successful.”</i></p>
4.7	<p>Add 'Policy Proposal:</p> <p><i>“Bring forward proposals to spread the lessons of phase 1 from Chester to other communities within CWaC, and to ensure that the benefits of cycling to the economy and quality of life continue to be promoted through a successor programme”.</i></p> <p><i>“Implement the city centre cycle permeability proposals identified in phase 1 of the Chester Cycle Demonstration Town Project”</i></p> <p><i>“As a trial, extend the existing times that cyclists are allowed to share with pedestrians in Chester City Centre, and if successful roll this approach out to other CWaC communities”</i></p>
6.9	<p>Add 'Policy Proposal</p> <p><i>“Actively investigate upgrading the canal between Ellesmere Port and Chester so that this can be adopted as a high-quality off-road cycle and pedestrian route to provide access to major employment sites (including Chester Hospital) particularly for disadvantaged communities.”</i></p>

8. Suggestions for first 3 Year Implementation Plan

1. Establish where cycle facilities at railways stations or on trains need to be improved, and work with train operating companies and station operators to develop a programme of improvements so that (a) all stations have adequate cycle parking, (b) all stations have reliable facilities to safely move bicycles between platforms, and (c) bicycle capacity on trains is increased. The programme needs to be agreed in Year 1, but it is recognised that not all improvements may be possible within the first 3 year implementation plan.
2. Invite The Campaign for Better Transport to survey Chester for their Dependency Scorecard and establish targets for reducing the percentage of journeys made by cars, and increasing the percentage of journeys made by bicycle, walking and public transport. Aim to be in the top 20 towns in the UK by 2016. http://www.bettertransport.org.uk/system/files/car-dependency-scorecard_1.pdf.
3. Deliver the updated guidance setting out expectations on how travel plans will be secured, as per the policy proposal in Section 5.12 of Tackling Climate Change..
4. Prioritise the recommendations in the Permeability Study / Cycle Masterplan to be implemented over the 3 year period, based in part on the on the priorities established in the Permeability Study / Cycle Masterplan itself but also considering opportunities provided by 3rd party developments. Aim to implement at least 3.
5. Reinforce the existing cycle routes and maps by producing a single, larger and more detailed map, that shows, for example off-road cycle paths, cycle lanes, cycle advisory routes (e.g. the quiet roads on the coloured route network). This would give cyclists a single map that they could use to plan journeys across the city. The map for City of York is an example.
6. Establish an inspection and maintenance programme for cycle paths and shared use paths, and Integrate routine maintenance of cycleways into general road maintenance plans and ensure that near curb surfaces are maintained. Aim to achieve in Year 1.
7. Establish a mechanism in Year 1 to continue the work of CDT and Connect2 to promote cycling as a sustainable form of transport, for example a standing cycling consultation group or similar. Hold regular meetings of the cycling consultation group to help identify and develop opportunities to promote cycling, and publish records of achievements and plans.
8. Develop links with large businesses to promote and fund low carbon travel initiatives. Aim for businesses to fund at least 3 soft cycling projects in three years
9. Develop links with community groups to promote and recruit volunteers to develop cycling and walking initiatives. Recruit representatives from at least five different groups to the standing cycling consultation group (as described in 7) in the first year.
10. Develop business and community partners to successfully implement projects funded by Sustainable Travel Fund. These partnerships should be established done in Year 1
11. Increase cycling by 27% from a 2010 baseline in all major urban areas (the average achieved by the first 6 Cycle Demonstration Towns in the first three years (<http://www.dft.gov.uk/cyclingengland/cycling-cities-towns/results/>)).
12. Reduce commuter journeys by car by 18% from a 2010 baseline as demonstrated on average by the DfT Smarter Choices document 2004 (<http://webarchive.nationalarchives.gov.uk/+http://www.dft.gov.uk/pgr/sustainable/smarterchoices/ctwwt/chapter13projectionsandcosts.pdf>).
13. Double the number of school children travelling to school by foot, bike or bus from 2010 baseline (as achieved by the first 6 Cycle Demonstration Towns (<http://www.dft.gov.uk/cyclingengland/cycling-cities-towns/results/>)).
14. Provide covered/CCTV protected bike parking at all major bus stations.

15. Introduce Smarttravel plans in all major urban areas by the end of the three years.
16. Carry out a survey of the missing cycleway links to provide routes from rural/semi-rural areas to major employment and a plan for implementation in the first year. This could be a list for relevant planning permissions, use of the sustainable travel fund.
17. Provide bikeability for all school children and offer adult cycle training and maintenance courses.
18. Raise awareness of relevant staff so that street furniture and temporary signage does not impede the travel of cyclists on roads and cause them to divert into the traffic. Monitor performance over the three years
19. Salt cycleways and pavements as necessary to maintain safe routes.
20. Hold regular Borough wide Cycle Forums to help develop council policy with published quarterly reports of achievements and plans.
21. Upgrading the canal between Ellesmere Port and Chester so that this can be adopted as a high-quality off-road cycle and pedestrian route to provide access to major employment sites (including the Countess of Chester Hospital) particularly for disadvantaged communities.