

Longsight Transport Project
MERCi
22a Beswick Street
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6th September 2007

Department of Transport
By email to
LocalTransportBill@dft.gsi.gov.uk

Dear Sir or Madam,

Thank you for the opportunity to comment on the Local Transport Bill. I am responding to the consultation on behalf of the Longsight Transport Project (LTP) and Manchester Friends of the Earth. We are pleased to see that attention has been given to reform transport legislation and wish to contribute the following suggestions.

Apologies for not being able to respond to the full questionnaire at the rear of the consultation document: as voluntary organisations we do not always have the capacity to respond to every detail. However, below are what we believe to be the aspects of the local transport bill most pertinent to the work we have been doing in recent years in Manchester. These are the areas in which we can make the most useful contribution to the discussion.

By way of background, Manchester FoE has been working on transport as an environmental and social issue for decades. Our Longsight project, which became independent from Manchester FoE in 2003, but in which volunteers continue to be personally involved, has been working on transport as a social inclusion issue in an environmental justice context. We campaign for a transport system that is environmentally sustainable and socially inclusive, and promote and demonstrate the importance of community involvement at all levels of transport planning.

The Longsight Transport Project is a community project in inner-city Manchester that has been working on local transport issues for four years. The area, Longsight, has a high ethnic population and low car ownership. The first piece of work was a detailed consultation of the local community to find out what transport and related issues local residents were concerned about, culminating with the report 'Better Buses and Safer Streets for Longsight.' Since this report was published, in 2003, a community group has formed and, with the facility of a paid worker and support from Friends of the Earth England Wales and Northern Ireland, has begun to take forward the issues raised in the report. These issues include not only public transport but also walking, cycling, traffic and parking. Its activities include a website to encourage participation, a monthly radio show, ongoing monitoring and consultation work and involvement in key policy mechanisms including the Local Strategic Partnership and Ward Coordination Meetings. In June and July 2006, we carried out a brief survey of the 53 and 54 bus services, and the findings are a snapshot of passenger experiences. A document summarizing that work is included in this letter. Our monthly transport radio show, On The Move, includes reports of the experiences of people using transport in the local area. An archive of this material is available at www.onthemovefm.org.

Our concerns about the bus network in Manchester have not changed significantly since we submitted a

representation to the 'Putting Passengers First' consultation. I enclose the letter submitted by the Longsight Transport Project, since I think this provides important context for our views on the Local Transport Bill.

During our work with people who rely on public transport, and our work trying to promote modal shift away from cars towards more sustainable options, we have become convinced of the need for stronger regulatory powers to be available to statutory organisations, such as GMPTE.

In particular it is necessary to be able to influence the following factors which we believe should be mandatory aspects of a quality partnership/contract – not optional, as implied by the consultation document.

- **Fares** – a maximum fare should be in place to ensure consistency between routes, and passengers should be warned of any fare rises well in advance. There should also be a minimum period in between fare rises. Decision on the level of maximum fare and concessionary fare should be taken on grounds of affordability and social inclusion, not simply on commercial grounds.
- **Punctuality** – passengers need to be assured of punctuality. In our discussions with GMPTE we have been told that they have little ability to penalise bus companies for poor punctuality. We welcome the proposals to mandate bus companies to report their punctuality regularly to the transport commissioner and ask that this information also be available to passengers. One of the issues we have found in communication with bus companies is the somewhat demoralising statements that punctuality is improving even though this is not how it is perceived by the passengers.
- **Frequencies** – it is necessary for the authorities to be able to specify minimum frequencies, since this allows for a co-ordinated network,
- **Emissions** – Manchester's Piccadilly bus station is one of the most polluted spots in Manchester. Stronger powers are needed to ensure that bus companies are using the cleanest engines possible.

We welcome the proposal to replace the 'only practicable' criteria with a public interest test for quality contracts. This, we believe, will enable authorities to respond to passenger concerns more effectively and avoid the situation arising, whereby bus services remain substandard for a number of years while negotiations are taking place and other approaches are being tried. The fact that the voluntary partnership arrangement has already been possible for seven years but has not been implemented implies that a stronger option is needed. This approach allows for a more proactive role from the authorities. However, we feel that a more overt connection with the accessibility planning agenda, as set out by the Social Exclusion Unit in 2004, needs to be made in the criteria. The proposed criteria place too much emphasis increasing the use of local bus services, whereas enhanced accessibility of local services is a worthy goal in its own right. We would therefore suggest the additional criterion:

'enhance social inclusion, or at least not increase social exclusion, by improving access to key services, as defined by the Social Exclusion Unit in 2004'

This addition is necessary to avoid the situation arising in which undue focus is given to radial services, to increase passenger numbers, at the expense of cross-city services and the potential decline in access to basic services. It also helps to guard against situations for which, for example, faster journeys and reduced waiting times are achieved by omitting important stops from a route or rerouting away from particular communities: as the enclosed letter explains, this is an issue that has arisen in our work. By way of implementing this criteria, it is essential that community organisations, such as Community Network for Manchester and Greater Manchester Council for Voluntary Organisation Transport Resource Unit in Manchester and Greater Manchester be consultees on the decision-making process.

We welcome the proposals to allow more flexibility in the community transport sector.

We are pleased to see a proposal for PTA and metropolitan district councils to have regard to Government policy on climate change. However, we believe this should be strengthened to 'a duty to contribute to the reduction of national climate change emissions'. With road transport accounting for a fifth of the UK's climate change emissions, a contribution that is increasing, it is essential to put measures in place to facilitate the rapid reduction of the sector's emissions. Specific practices, such as not leaving bus engines on when stationary for, say, three minutes, should be included in the legislation. Additionally, requirements pertaining to local air quality should also be stipulated – the fitting of particulate traps, for example.

We support road pricing in principle, as a way of creating modal shift and reducing climate emissions. We would ask that a further criterion is added to 5.18 in the consultation document:

'specificity explicitly that local authorities in England and Wales may choose to vary prices according to the emissions from a vehicle, the ability of the driver to pay and the necessity of the journey.'

This would allow for measures that encourage the driving of cleaner vehicles and avoid road pricing being socially exclusive, particularly those who can justify the use of a car during charging hours by the requirements of their profession. Furthermore, it should be explicitly stated that road pricing schemes should contribute to national efforts to reduce climate change emissions.

Finally, we note that considerable work has been done to plan for future improvements to the bus services of Greater Manchester as part of the TIF bid recently submitted to Government. We would ask that these plans are taken into account when finalising the Local Transport Bill.

I trust that these views will be taken into account in the Bill's development. If you require any further explanation on the above, please do not hesitate to get in contact.

Yours Faithfully

Dr Graeme Sherriff
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