



6th February 2024

Dear Dame Sarah Storey

We trust this letter finds you well.

We write this open letter to you because we once again have become concerned by the approvals process regarding the Levenshulme & Burnage Active Neighbourhood (LBAN) project, which has been administered by Transport for Greater Manchester (TfGM), on behalf of yourself and the Greater Manchester Combined Authority (GMCA) - the decision makers regarding the use of the Major's Challenge Fund (MCF) monies that this scheme would be primarily funded by.

It has come to our attention that Manchester City Council (MCC) have submitted their final business case (FBC) for the scheme to GMCA, following a 'critical friend' review process, undertaken by TfGM's officers, in conjunction with MCC. MCC now inform us that this FBC submission includes no filters in addition to those already installed, the filters on Linden Park and Milwain Road, and the filter proposed as part of the proposed sparrow crossing on the A6 at the junction with Belvoir Avenue.

This means that much of the 'active neighbourhood area' would continue to suffer from rat running on narrow, residential streets. The presence of such means that it is almost impossible for most residents in the scheme area to reach Levenshulme's main amenities on the A6 corridor without encountering road conditions that are dangerous, hostile, and unlikely to encourage walking, wheeling, and cycling for shorter journeys.

Fol releases reveal recurring TfGM officer concerns

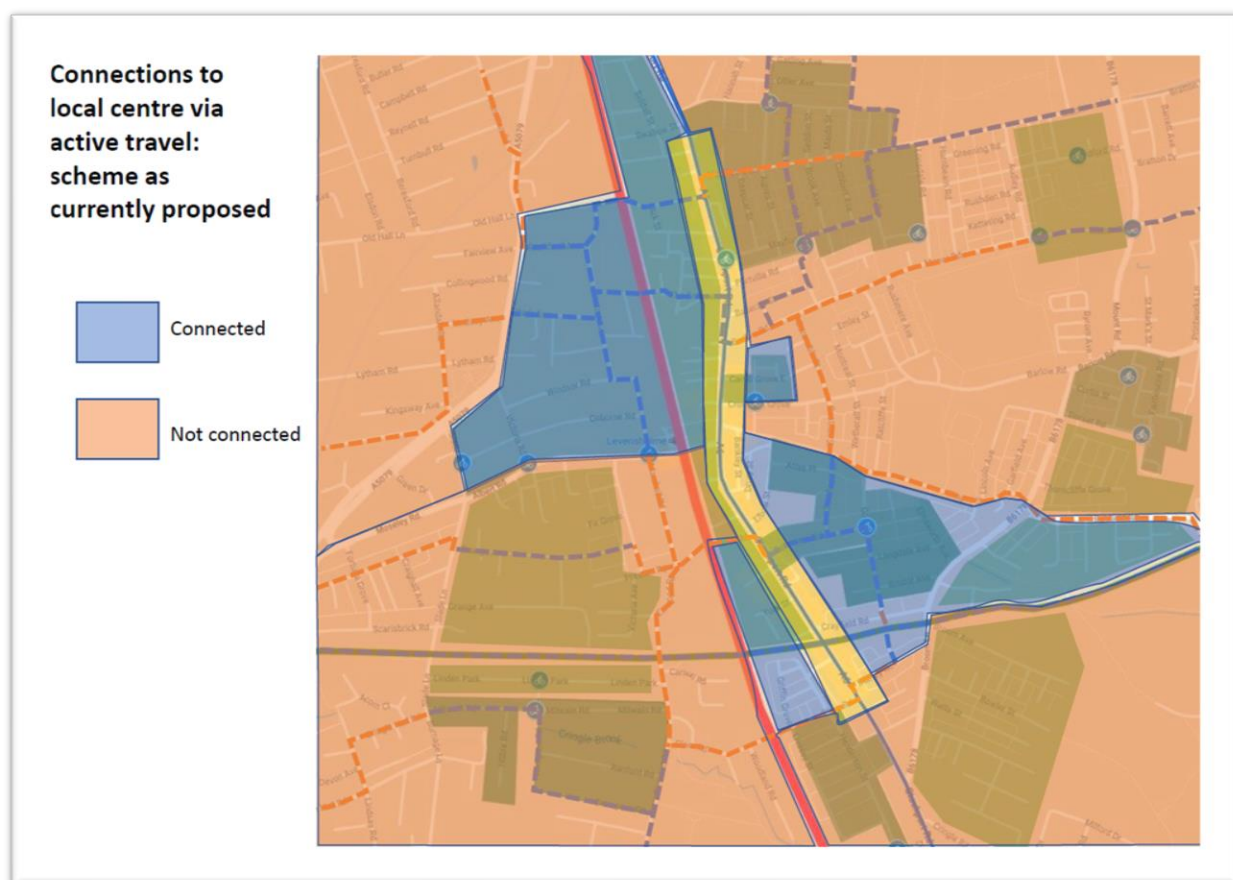
Thanks to an Fol request, we can see that a TfGM officer (name redacted) has made this point to MCC clearly. The [statement](#), on 22 May 2023, reads:

It is not clear how the various measures sum to provide connected routes for walking, wheeling and cycling through the neighbourhood, for example in terms of connecting residential areas to key services such as shops and schools, through high quality routes that advantage both walking and cycling... Some routes for cycling that appear to be enabled by the scheme are likely to still be reliant on some connections on roads with more than the recommended amount of traffic for mixed traffic cycle provision.

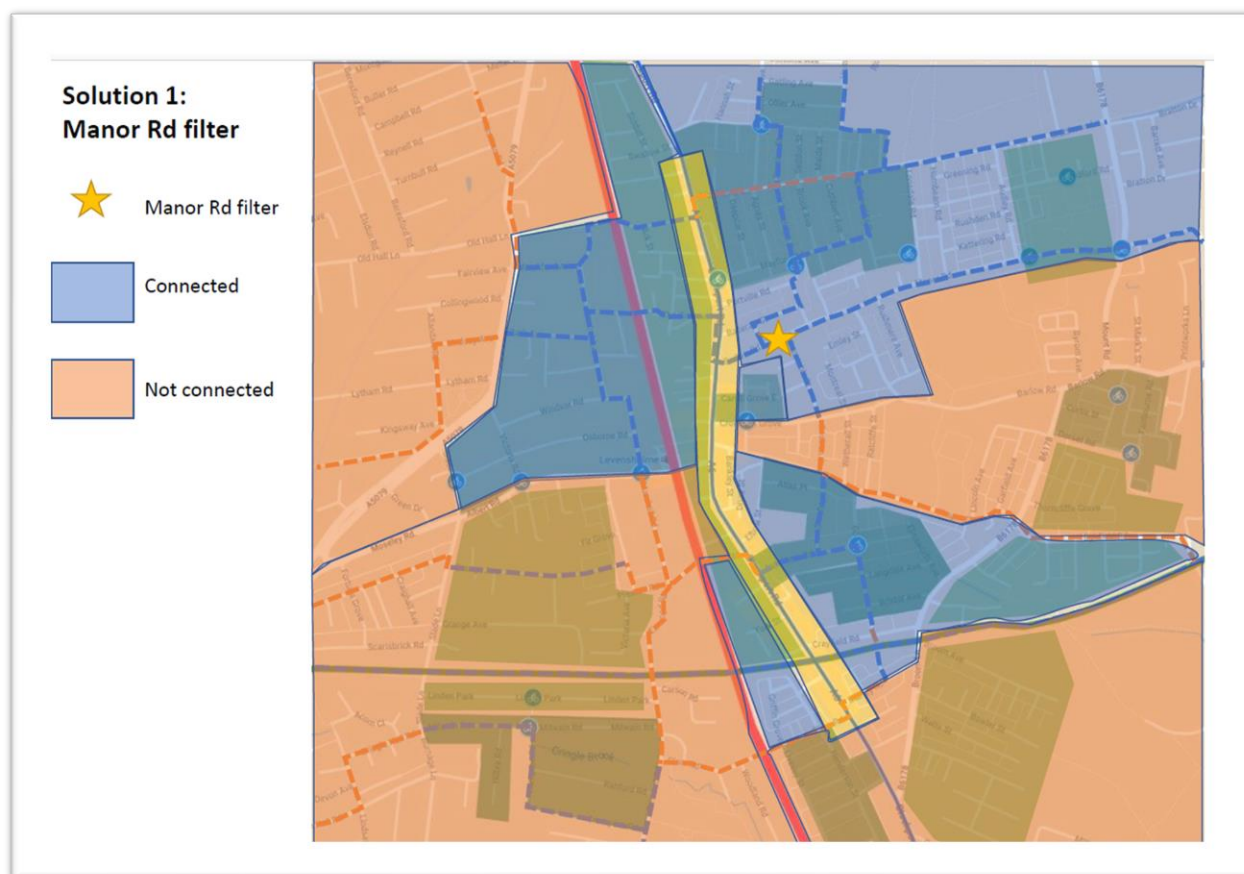
In addition, existing measures (such as filters) 'have value, but they do not appear, as currently proposed, to amount to a holistic plan which will deliver connected active travel routes through the area.'

It then goes on to reference [two slides which show an example of how connectivity in the scheme can be increased to meet Bee Network standards](#). The first shows the current situation – which is likely very similar in substance that is to be presented in the FBC:

It shows that very little of the scheme create active travel connectivity to the A6 'local centre':



The second shows the impact of installing an additional filter at the western end of Manor Road would have:



While not creating connectivity for the entire scheme area, it would create safe routes to community amenities *for thousands of residents, with the addition of only one extra filter*. As the TfGM officer [comments](#),

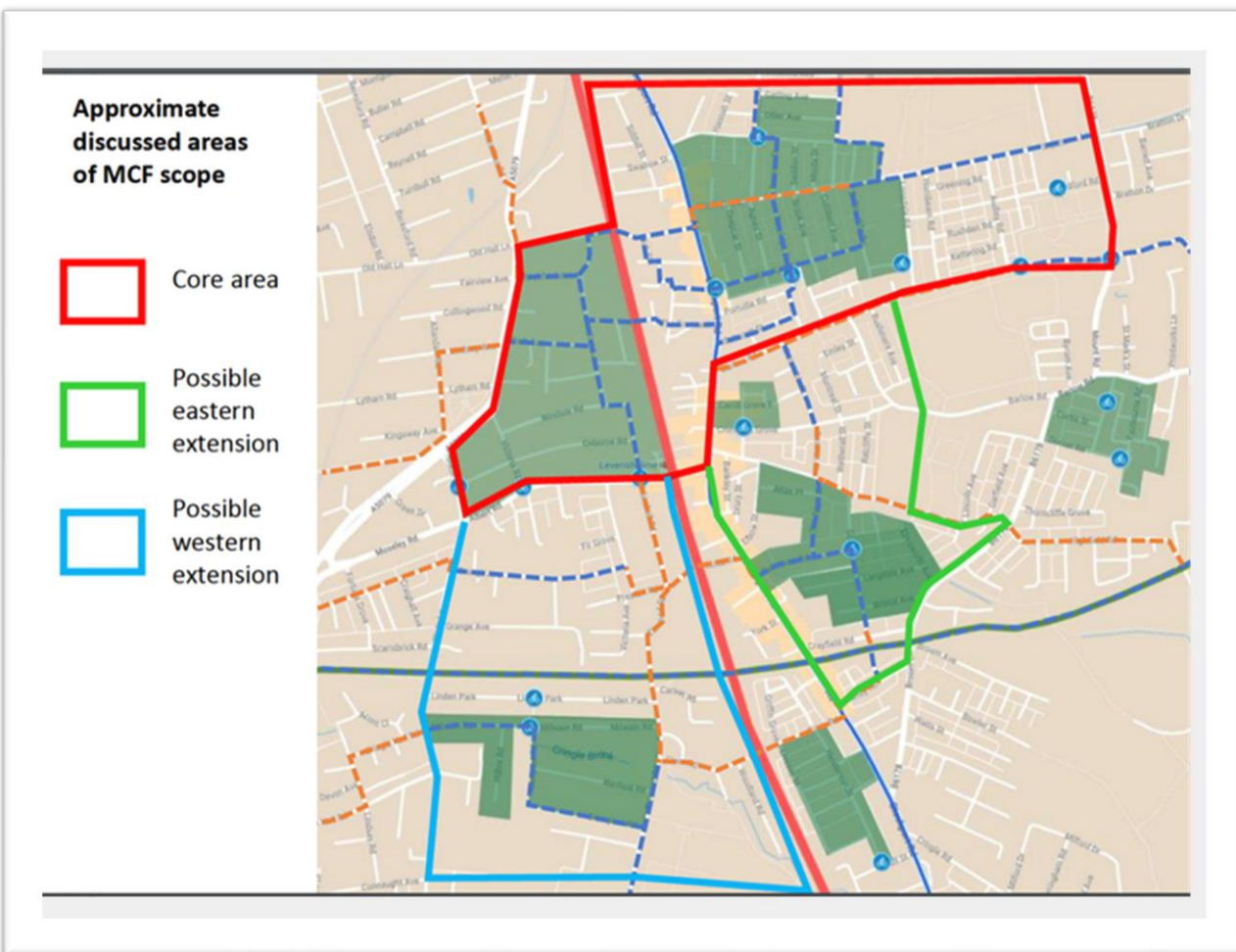
It is this connectivity – how communities are linked to local services – which is at the heart of what an active neighbourhood should deliver... This was also emphasised and agreed when the Active Travel Commissioner and the [MCC] Leader met with [TfGM's] Richard Nickson regarding the scheme some months ago. This position is consistent and has not changed.

This theme was returned to again, in another review meeting between TfGM and MCC, on 9 June 2023. In the communications surrounding this meeting, a TfGM officer [comments](#):

I wanted to confirm in writing a straightforward description of what TfGM believes that the scheme needs to demonstrate, that it does not currently, as part of a successful FBC for funding through MCF. This is that it needs to provide a single, contiguous area, within which network connectivity can be demonstrated, at Bee Network

standards, for walking, wheeling, and cycling... It ought to be possible to navigate from any given point within that area, to any other point within that area, on Bee Network routes or other quiet streets.

Given these stipulations, the joint TfGM/MCC team “discussed a core area around the northern part of Levenshulme”, shown in red on the below map. The team also discussed the possibility of linking this “core area” with “eastern” and “western extensions” – green and blue on the map, by addressing the current lack of safe north to south routes in the scheme area.



Returning to the ‘core area’, the TfGM officer reported that the whole area could be made safe for walking and cycling, with the addition of two features. These were redacted from correspondence, presumably because releasing this information would prejudice the consultations which would be necessary to include them into the scheme.

It seems highly likely that one of the measures proposed was the sparrow crossing on the A6, which has recently finished consultation. This would ensure the safe passage of

pedestrians and cyclists across the busy and dangerous A6 (the orange line on the map), without which the “core area” would be divided in two.

It also seems highly likely that the other proposed measure would make safe the remaining streets in the eastern side of the ‘core area’ from rat running traffic. These are the streets not shaded in green by TfGM, to show that they are streets which currently do not fulfill its safety criteria. These are the streets that run north to south, between Matthews Lane and Manor Road – Lonsdale Road, Hornbeam Road, and Audley Road – and the smaller streets coming off them west to east (highlighted as an ‘area of leakiness’ by [this TfGM officer’s report](#)).

As we [previously argued](#), the council’s previous decision to install a filter at the eastern end of Manor Road, but not to install a second filter at the western end of Manor Road – despite the popularity of the proposal in the original consultation – leaves the eastern ‘core area’ as rat runs. This will be made even worse by the installation of traffic calming on Matthews Lane, which will funnel even more fast moving traffic down these narrow, residential streets.

The only way, therefore, to achieve a ‘core area’ that meets the minimum standards as delineated by the TfGM officer, would be to either to filter each of Lonsdale, Hornbeam and Audley roads, or, more realistically, install a filter at Manor Road’s western end. We assume that this was the additional measure the TfGM officer proposed during the design review process.

Creating a filtered solution to the eastern end of the core is clearly a bare minimum requirement for any scheme which claims to be an active neighbourhood – unless, of course, measures to create contiguous areas of the western or eastern extension, which would also require additional filtering, could be found.

Indeed, it is difficult to see, in light of the TfGM officer comments, how this scheme would meet the key ‘strategic case’ test of FBC. The relevant document – GMCA’s [Streets for All Strategy](#) – clearly states that that streets in Active Neighbourhoods should prioritise walking and cycling over motor traffic, be a low speed and low traffic environment, and provide “safe, attractive connections to local destinations” for active travel users (page 44).

Broken promises?

IMCC is proceeding to FBC submission without further improving the scheme for active travel by filtering. It has either done so ignoring the advice of TfGM on this matter, or, more likely, with TfGM’s support. *If the latter is the case, then it appears that your commitment to us, and that of your predecessor, has not been realised.*

In our [open letter to you, dated 17 October 2022](#), we called you to make an “official response from your office to state that these [current] designs do not meet the required Bee Network standards and an urgent rethink is needed”. Responding, you told us that [the scheme had not been brought to TfGM’s Design Review Panel](#), but that we should “be assured that the

scheme... will be rigorously reviewed to fulfill the objectives laid out in Bee Network standards”.

Your intervention appears to have resulted in a more rigorous process, as highlighted in the quotes from our FOI request above. We are very grateful for this intervention, which appears to have had its desired effect, at least at that stage.

On 21 November 2022, we wrote to you regarding [our concerns over scheme delay and the fact that MCC had already built much of the scheme](#), at their own financial risk, and with no public indication that they wished to improve the scheme for active travel users. In [response](#), you stated that you were “unable to pass judgment or intervene because a local authority is perfectly entitled to build a scheme in any order they decide, so what can be seen today may not be what is brought to the final business case review”.

That was not the appropriate time – you were correct – but now is. This is the final opportunity to ensure that the scheme meets the bare minimum of objectives it purported to achieve in original programme entry to the MCF. Clearly, the scheme is not of high enough quality, according to the reasons made clear by ourselves, TfGM officers, and many residents. Funded as we believe the scheme stands in the FBC, it will fail to meet its active travel objectives. There is no evidence from scheme monitoring, nor broader professional or academic evidence, to support the notion that filtering individual streets without providing safe and comfortable routes between their residences and community amenities, has or will enable a significant uptake of walking and cycling.

At stake here are important considerations, for your role and the future of active travel in GM. If the scheme passes without extra filtering, many other local authorities will wonder why MCC has been allowed this scheme, while equally or more ambitious projects have been denied programme entry in the past. Furthermore, it will signal that local authorities can exert political pressure on TfGM by proceeding without design approval in order to force through substandard designs. It would set such a low bar for similar future schemes.

Approval of the current scheme would make a mockery of the design review process, leaving GM exposed to poor future funding prospects. There is also little chance the larger Active Bee Network project will ever succeed, alongside regression into outdated and disproven notions of what is necessary to achieve modal shift.

Finally, and most importantly for us, it would be a breach of trust. Our community were [promised something ambitious and transformative](#). We responded with some of the largest majorities for any LTN/active neighbourhood project in the country, in consultation after consultation, and manifold residents and community groups have taken time out of their lives to bringing their neighbours on side (the [well-attended public meeting](#) we recently held was further proof of such efforts, if such proof were needed).

We urge you to review the proposal in light of these arguments. It's not too late to restore that trust and to bring us all together again, for the important work that lies before us in the years ahead, which we would look forward to working with you on.

Given the urgency of the situation, we would be grateful for a full response to this request in the next two weeks.

Sincerely

Streets for People Levenshulme and Burnage