

## APPENDIX A : SUMMARY OF RESPONSES TO THE CONSULTATION

Consultation Feedback	Action
Some respondents felt that the Strategy was ‘tokenistic’ and a ‘tick box exercise’.	The SMOTS Strategy is an important strand of helping the Council to deliver the outcomes of the new Local Transport Plan (LTP), including supporting growth and economic strength through connectivity; ensuring accessibility to services; protecting and improving our environment; and promoting health, wellbeing and physical activity. Under the ‘Education and Inspections Act 1996’, the Council has a legal duty to publish a ‘Sustainable Modes of Travel to School’ (SMOTS) Strategy. We are going beyond our legal duty and supporting schools to enable them to bring about real change in travel behaviours.
Comments were received in relation to the impacts of school congestion and car dependency and on the need to change travel behaviours.	This strategy sets a framework to enable changes in behaviour and reduce the impacts of current travel behaviour for journeys to schools.
Some respondents commented that the evidence base for the strategy could be improved.	All schools within Cheshire East were approached to provide data. The SMOTS Strategy sets out how the Council can support and engage with schools in the future to encourage greater engagement in the school travel planning process.
Some respondents felt that the examples of infrastructure improvement schemes provided (Section 5.2.1) were not appropriate, as either successful schemes or routes that were appropriate for children travelling to school.	It is planned that through the development and implementation of School Travel Plans, new and existing infrastructure will be promoted and use will increase. The SMOTS strategy and the Safer Routes to School Programme will allow new infrastructure to be identified by school communities.
Some respondents felt that the Strategy lacked measurable improvements, responsible owners and completion dates.	The Action Plan (Section 7.2) has been updated. Links to Strategy outcomes added.
Some respondents were unclear as to who should have responsibility for implementing sustainable travel to school.	Schools are best placed to identify their local travel issues and develop their own School Travel Plan. The Council will provide the Modeshift STARS online system to support schools in the step-by-step process of producing a travel plan. The Council and partners will continue to

	provide support on travel issues as outlined in Section 5 and can offer officer time to consider, develop and, where funded, implement appropriate schemes.
A number of comments were received regarding the financing of the Strategy and concerns over the effectiveness of implementation if not well resourced.	CEC has allocated £150,000 from the annual Local Transport Plan capital fund for 2018/19 to fund the feasibility/design studies and implementation of prioritised schemes through the Safer Routes to School Programme. Additional revenue funding will purchase the annual Modeshift STARS registration and provide Officer support. An additional benefit of the Safer Routes to School Programme is that it enables the Council to develop a pipeline of schemes, where the Council can also seek alternative external funding opportunities.
The social/mental health benefits of the Strategy should be promoted.	Cheshire East's Public Health team has been included in the development of the Strategy and are supportive of its aims and objectives.
Greater promotion of sustainable modes of transport is required within school communities.	The SMOTS Strategy is aimed at all journeys to schools. Information reinforced in Sections 1 and 6.2.
Sustainable travel should apply to all journeys to schools – pupils, parents and staff.	
Catchment areas of schools should be reviewed.	The local authority is the Admissions Authority for Community and Voluntary Controlled Schools. All other schools including Academies, Free Schools, Voluntary Aided and Foundation Schools, University Technical Colleges and Studio Schools act as their own Admissions Authority. 45% of schools in Cheshire East are Academies. It is important to note that Academies can change their Admission Arrangements to include pupils from areas that are outside of their historical catchment. For Voluntary Aided schools, parish boundaries, not catchment areas, are used. Details of each School's Admissions Arrangements and who is their Admissions authority can be found on the Cheshire East and school websites.

<p>Non-car use should be a condition of school admission.</p>	<p>The Admissions Code sets out a list of suggested oversubscription criteria. Although this is not a definitive list, the Local Authority has used criteria from this list to ensure that it is compliant with the Code and the criteria used are ‘reasonable, clear, objective, procedurally fair and comply with all relevant legislation, including equalities legislation’ as required by the Code. The Admissions Code also makes clear that the Admissions Authority cannot ‘give priority to children according to the occupational, marital, financial or educational status of parents applying’. It might therefore be difficult to include this as an objective criterion and could also potentially disadvantage families living in rural areas or where mobility issues necessitate the use of a car.</p>
<p>The current measures to support schools in encouraging sustainable travel, as set out in Section 5, are not appropriate (39% of respondents).</p>	<p>All of the measures currently provided are considered by the Council to be appropriate and should continue to be offered to school communities. The Council recognises that the measures will not be appropriate in every circumstance but this should not preclude them from being promoted and implemented where appropriate.</p>
<p>Targets need to be set for cycling.</p>	<p>Cheshire East’s Cycle Strategy sets out a vision for a network of high quality strategic cycle routes which are safe (and perceived to be safe), connect local communities and key growth areas, whilst also giving access to leisure opportunities and Cheshire East’s natural environment. It targets a doubling in the number of people cycling once per week for any journey purpose in Cheshire East by 2027 from a 2014 baseline. New paragraph added at 5.3.1.</p>
<p>Several respondents commented that cycling needs to be safer.</p>	
<p>More high quality cycling infrastructure is required to increase the number of cycling journeys.</p>	
<p>Cycle facilities at schools need to be improved.</p>	<p>It is not currently proposed that Cheshire East will fund any improvements on school sites. The School Travel Plans will provide evidence if there is a need for on-site improvements to facilitate changes in travel behaviour. If appropriate, the Council will explore future potential funding sources.</p> <p>The Safer Routes to School Programme will seek to address external barriers to sustainable journeys to school.</p>

<p>Some respondents felt that walking should be encouraged but that pavements and routes present barriers for safe journeys.</p>	<p>Specific walking (and cycling) issues associated with the journey to school can be proposed for assessment and funding via Safer Routes to School Programme.</p> <p>Clarification in Action Plan (Section 7.2)</p> <p>In addition, Cheshire East Highways has an annual programme for improving footways. Feedback from the School Travel Plans will be provided to the Highways team for their consideration through future footway improvement programmes.</p>
<p>A number of respondents felt that public transport use should be encouraged but that the recent bus service review has made this a less viable option.</p>	<p>The changes from the Council's Supported Bus Service Review looked to ensure the effects of the changes were minimised by retaining services which could be used by children travelling to and from school. Following the consultation a number of changes were made to the proposals to mitigate the identified impacts including the retiming of services to allow passengers to get to school and work and the introduction of alternative bus services where services were being withdrawn.</p> <p>All bus fares within Cheshire East are set by operators and are outside of the control of the Council. The major operators within the Borough, including D&amp;G, High Peak and Arriva, do offer discounted tickets which offer a reduction in the fare for students at college. The setting of rail fares is overseen by the UK Government's Department for Transport but discounts are available for passengers holding a 16-25 railcard.</p>
<p>Some respondents felt that Highways Regulations should be more stringently enforced, to help reduce the impact of school congestion.</p>	<p>It is an objective for Civil Enforcement Officers to patrol three of the most problematic schools each per week. Enforcement action is taken as required.</p> <p>Civil Enforcement Officers have also given parking enforcement presentations in assemblies at some local primary schools. This is often at the more problematic locations, with the aim that children will educate their parents with regards to safer parking in and around the school area. Working jointly with Cheshire Fire and Rescue Service, it is intended that when the presentations take place, a fire engine will be in</p>

attendance to show how wide they are and that being able to safely move along the highway is so important, which is not always possible due to irresponsible, inconsiderate and illegal parking.

Schools are encouraged to mention parking issues in their termly bulletins where they actively promote safer parking around schools.

Parking restrictions (yellow lines) can only be installed to secure the expeditious, convenient and safe movement of vehicular and other traffic but the Council also has a duty for the provision of suitable and adequate parking facilities on and off the highway. The Council's approach is to consider parking restrictions where parked vehicles are proven to have a detrimental effect on capacity, in locations where collisions may be reduced or where the Police have raised concerns and where all other options have already been considered. Any proposal will have due consideration to the displacement of vehicles.

The Council's Speed Limit Strategy, which is in accordance with Department for Transport (DfT) Guidance, states that 20mph speed limits and zones can be considered in areas of high concentrations of vulnerable road users where vehicle movement is not the primary function. Research has shown that signed-only 20mph speed limits generally lead to only small reductions (about 1mph on average) in traffic speeds and therefore such limits are most appropriate where mean vehicle speeds are already low. Mandatory 20mph speed limits and zones will only be considered in those locations that are generally self-compliant due to the nature of the road layout or the presence of traffic calming features. The standard speed limit in urban and village areas is 30mph.

Enforcement of speed limits can only be carried out by the police. However, through strong partnership working, Cheshire East will assist in the targeting of locations that experience excessive or inappropriate speeding. The Cheshire Constabulary Speed Management Process is used

	<p>for all speed related complaints that are received. This is an evidence led process and any engineering works identified will be fed through to the Council's minor works programme. Cheshire Police will undertake various speed awareness activities across the network along with active speed enforcement through the use of mobile speed camera vehicles.</p>
<p>The Strategy is too long.</p>	<p>An Executive Summary has been included.</p>
<p>The Strategy is not ambitious enough and only 'supports' or 'encourages' actions.</p>	<p>The Council has a legal duty to publish a SMOTS Strategy.</p> <p>We have identified the guidance and support that we and other delivery partners are providing to schools to enable them to encourage sustainable travel. We have recognised that our support needs strengthening and are therefore establishing a new Safer Routes to School Programme, funding the provision of Modeshift STARS and providing additional officer support to promote the system and help schools with additional technical advice when this is not provided by Modeshift STARS.</p> <p>The Safer Routes to School Programme will also allow the Council to identify potential schemes that could be funded through alternative budgets (Highways and external parties), thus extending the reach of SMOTS.</p>
<p>The two stage appraisal process may favour schemes that are easy and cheap to deliver.</p>	<p>The first stage of the appraisal is to remove schemes/projects that are unachievable within appropriate timescales, are not an appropriate solution (eg over-engineered) or will only provide a benefit to a small part of the school community. We anticipate that all schemes will be of comparable cost.</p>
<p>Highways Engineers should be integrated into the planning stage of schemes so that ideas are realistic and deliverable.</p>	<p>Any significantly more costly schemes will be proposed under other Council funding allocations where feasible and appropriate.</p> <p>A team will be included in the appraisal process to ensure suitability of schemes. Advice can be provided by officers prior to application.</p>

<b>Submitting requests to the Safer Routes to School Programme</b>	
Officer guidance and assistance should be provided, including communication.	<p>A Guidance Note and template Application Form will be produced for schools to inform Cheshire East of specific walking and cycling issues that act as barriers preventing more sustainable journeys to school.</p> <p>Applications must be supported by evidence from School Travel Plan surveys or anecdotal evidence from the school community, incorporated into the STP.</p> <p>Cheshire East officers will assess applications using the process set out in Section 8.2 and inform schools of the decision.</p> <p>Schools without School Travel Plans will not be able to submit applications. An STP provides the framework for a school to identify issues and to implement appropriate measures using a sound evidence base.</p>
The process should be short and simple.	
Examples of appropriate schemes should be provided.	
The pre-requisite of having an up-to-date School Travel Plan could exclude some schools with travel issues.	
Any interested party should be able to submit route improvement suggestions.	Members of the public can inform the Council of route improvement suggestions. They may be appropriate for other funding sources.
Several comments were regarding the Council's approach to ensuring active travel is incorporated into new developments.	The Council's approach to ensuring active travel is incorporated into new developments is addressed in the Cycling Strategy and, in particular, the implementation of the Cycle-proofing Toolkit.