



The countryside charity
Gloucestershire

LOCAL TRANSPORT PLAN consultation for plan period 2015 – 2041

Response by CPRE Gloucestershire

March 2020

- 1) Introduction.** In our view the LTP as currently drafted is over long, unnecessarily detailed in parts and very repetitive. It would benefit from a rigorous edit. It is also very confusing in its numbering. It would be helpful if it were numbered right through i.e. from page 1 to page 485, with each section of the plan renumbered accordingly to a standard format. Although a detailed document is necessary, it is surely undemocratic that something that will radically affect the lives of so many people should be presented in a way that will discourage all but a few experts and transport enthusiasts from responding. This is an important point as throughout the document there are sections where the input of local communities is essential.

Much of the plan is aspirational because it relies on other parties, over whom the County Council has no direct influence to agree and deliver funding (key examples are Network Rail and Highways England). It would be helpful if it were clear in the policies and text where that agreement is already in place and those policies and projects which are within Gloucestershire's (county council, district council and other public bodies) powers to implement.

Gloucestershire's landscape in all its diversity and beauty has been recognised, for instance in the emerging LEP Local Industrial Strategy, as a major attraction and contributor to economic growth. Travel infrastructure can if inappropriately designed or located have a significant damaging effect. The need to avoid this, or where it cannot be avoided mitigate the effects, is not mentioned in the plan. It should be a major consideration in policy formulation.

The transport problems and opportunities are very different between urban and rural locations. Each of the mode policy sections (PD1 to 6) tries to cover both. It might be better to have a separate section entitled Rural Areas (in addition to the section within the Connecting Places Strategies) which has specific policies covering each of the policy headings, eg Rural Areas – Highways.

- 1) Part 1. Shaping the way to 2041.**

CPRE supports the fundamental aspiration of the plan looking to bring about a significant modal shift from private cars to public transport (buses and trains) or active forms of travel (cycling and walking) in order to reduce CO2 and other harmful

emissions as well as reducing congestion. This aspiration is well laid out in the maps (Figures A to D) and in Table 1. However, this appears to be in sharp contrast to the Table A in Part 2 Overarching Strategy which puts the emphasis in prioritisation on highways improvements.

To secure the fundamental change laid out in Part 1 will require significant amounts of investment and commitment early in the plan period and it is by no means clear that the level of investment required will be available and available soon enough. Prioritisation is therefore fundamental and we question whether the hierarchy used to prioritise is correct; in our view the prioritisation should be firmly based on positive effects on climate change. That means a fairly draconian approach; discouraging travel by car or making it difficult and correspondingly making travel by public transport easy and more affordable. We see no evidence in the plan of firm and priority implementation of the necessary measures which would include dedicated bus priority lanes and increased public subsidies to ensure bus services are reliable, faster and cheaper than car travel and therefore attractive to use.

The road system in Gloucestershire has many stretches of relatively narrow single carriageway major roads. These are simply not suitable for either bus or cycle lanes. So the implementation of the ambitions depicted in Figures A to D will require dedicated new bus lanes and separate cycle lanes very much the way Oxfordshire has invested in a dedicated cycleway adjacent to the A40 from Oxford to Witney.

We agree with the statement that the transport system is now congested. The plan seeks to improve connectivity and mobility but subsequent parts of the plan appear to equate this with improving the highways network i.e. the short term fix. Only by investment early in the alternatives and incentivising their use will significant improvements in connectivity and mobility be achieved. However, we also agree that, because Gloucestershire is one of the most rural counties in England with a significant proportion of the population widely dispersed, there will always be a very heavy reliance on private car travel. So clearly vital is the investment in the multimodal hubs (or just park and rides) in order to achieve the modal shift for the all-important last leg of the to work journey.

Our fear is that the plan relies too heavily on technology to give people information and encouragement in the form of exhortation to change to sustainable modes of travel. Experience has shown that behaviour change comes about most effectively when it is positively incentivised.

(A good example from the past was the introduction of unleaded petrol which was generally agreed to be a positive move for health reasons. The oil industry put in all the facilities, with some arm twisting by government, and unleaded petrol was made available at petrol stations nationwide. However, because unleaded petrol cost more to produce it was priced above leaded. The result was that the take up was negligible. The government then increased the tax on leaded and reduced it on unleaded so that it was a penny or so a litre cheaper. Within a couple of years leaded petrol had disappeared. Financial incentive not altruism worked.)

In the introduction to this section, the plan states (para 1.2) that it will dovetail with the Gloucestershire's Local Industrial Strategy (LIS) and (para 2.2) that it is informed by the LEP's Strategic Economic Plan and the Gloucestershire 2050 vision. We are very supportive of the direction of the Gloucestershire LIS but the economic growth assumptions and therefore job and housing projections in the 2050 Vision and Strategic Economic Plan are pure fantasy. The LTP needs to be tested against lower growth rates.

Also, the plan introduction aspires to better integration of strategic land use, infrastructure and transport planning. We see nothing in the plan to reflect this integration, rather the opposite. Local Plans have been formulated and developments approved without adequate infrastructure investment. The transport element seems to come along afterwards if at all and the result is unsustainable levels of car commuting and congestion. A good example is the growth of traffic on the A38 south of Gloucester. It is now at the same level as it was before the M5 was commissioned. Similarly, congestion on the A48 and A40 from the Forest of Dean into Gloucester is reaching crisis point. This is largely due to the level of house building in the District well exceeding growth in employment: the emerging proposals in the Local Plan review look likely to make matters worse. It is absolutely essential that from now forward all new development is tested for adequacy of the transport system before approval can be given and if it is not there the development should be delayed until the transport capacity is identified and put in place. If there is no sensible economic way for transport capacity to be increased, then the development should not be approved at all. There is no risk in our view of this creating a shortage of housing as the current housing targets are based on excessively optimistic economic growth.

We welcome the inclusion of Quiet Lanes in the aspirations. This is an easy win but is not followed through in specific action either in the strategy or the policies on Walking or Connecting Places. We suggest a simple action would be to require district councils to write to all parish councils seeking their suggestions for quiet lanes. Quiet lanes are predominantly aimed at recreational rather than connectivity use.

We do support the major strategic investments in upgrading the A417 (missing link) and a new route for the A46 at Ashchurch to relieve congestion and to facilitate the delivery of the proposed garden community. However, for both these major schemes there should be a commitment to making them ones which the county can be proud of because their design has reflected the sensitivity of the landscape in which they sit.

The proposal for a third Severn crossing at Lydney/Sharpness is not clear as to whether it is for rail or road. If the later then it is likely to simply cause further congestion on the A38 and would not really solve the congestion problems on the A40 and A48 as much of that traffic originates north of Lydney. It is also difficult to see how it would be possible to locate the crossing without causing significant

damage to the landscape and disruption to the communities involved. However, it might be a viable option for rail with an associated pedestrian/cycle lane on the bridge. To gain clarity on the purpose, location, design and costs we support a proper study of the options and viability.

2) Part 2 Overarching Strategy.

We believe the Vision is fundamentally incorrectly expressed and at variance with the powerful commitments to climate change mitigation expressed in paragraphs 2.11 and 2.12 and the legal obligation all local authorities have to ensure their plans are compatible with the Climate Change Act and the Paris Convention. The vision '*A resilient transport network that enables sustainable economic growth by providing travel choices for all, making Gloucestershire a better place to live, work and visit*' only indirectly, if at all, refers to the imperative of reducing emissions from travel. It also omits any reference to healthier ways of travelling. We suggest something along the following lines:

'A transport system which contributes to mitigating climate change but at the same time allows a choice of reliable, resilient and healthier ways of getting from one place to another and making Gloucestershire a better place to visit live and work.' Achieving this will support economic growth but this need not be said as part of the Vision as economic growth depends fundamentally on decisions other than transport.

Paragraph 2.10 is misleading. It implies self-containment for instance in the Cotswolds. There has in fact been a significant increase in in and out commuting because housing and employment do not match (see below).

We totally support the sentiment in Paragraph 2.11. Electric vehicles are likely to be the main contributor to clean emission vehicles long term. However, in our view their contribution up to 2031 is likely to be limited in large part due to the lack of charging facilities. Therefore, it is essential to have a proactive approach to providing a comprehensive network of charging points across the county to make sure there are no obstacles to achieving this fundamental change.

While in the long term electric vehicles will help solve the problem of transport contributing to climate change they will not solve the problem of congestion on the roads and the need to move people to alternative modes must remain a key strategic goal.

Similarly, the problem of an aging population is mentioned but we have not found any reference to provisions to meet the needs of the elderly. More reliable or flexible public transport will be essential to meet their needs and this issue is particularly acute in rural areas.

We support the ideas and actions included in Section 3 Environment. We note in paragraph 3.1.13 the reference to integration between housing and employment.

We support this policy as one way of reducing the need to travel. However, in Gloucestershire all of the Local Plans are in place and the location and type of additional housing provided over the recent past has been largely driven by market demand and land availability. This is leading to an excess of unaffordable housing in the rural areas (particularly in the Cotswolds and the Forest of Dean) and unsustainable levels of commuting by car. We question therefore how realistic this aspiration is and what actions the LTP proposes to reverse the trend; the required periodic reviews of Local Plans would afford such an opportunity.

Comments on policies PD 0.1 to PD 0.6

Policy PD 0.1. Reducing Carbon Emissions and adapting to climate change.

The term sustainable transport needs defining particularly as the emphasis of most of those with whom GCC will work will be on road improvements. The implication is also that implementation of transport schemes will be determined by funding rather than policy goals. We are also concerned that the policy has set no requirements or criteria which have to be met for transport schemes to be approved. At the very least there should be a requirement that any scheme must demonstrate how it will contribute to climate change mitigation.

We are surprised to see no commitment to the introduction of ultra-low emission zones in the Central Severn Vale CPS. NICE has provided studies which demonstrate their effectiveness.

Policy PD 0.2. Local Environment Protection.

The introduction to the policy falls short of the requirements under the NPPF to protect landscapes both designated and locally valued. This is also true of heritage assets. It is not sufficient to aim to mitigate adverse effects.

On the detailed bullet points:

- There is no clear statement that measures must be taken to protect the landscape in its wider visual and tranquillity sense.
- It should be a requirement that all new developments, apart from the most minor, include the installation of electric car charging points.
- We support the provision of access for all to the countryside. However, this should be subject to the proviso that any car parks must be designed and located so that they have minimal impact on the landscape and light pollution is avoided.
- We support the maximisation of interconnectedness of Nature Recovery Networks. However, we question how this will be achieved since roads in their nature are a major disruption to such networks. A design requirement for wildlife under-passes or green bridges should be included in the text.
- We would expect to see new construction delivering biodiversity net gain.

PD0.3. Maximising Investment in a Sustainable Transport Network.

We are concerned that the introduction to this policy combined with the first bullet point is liable to misinterpretation. Together they imply that the key aim of the transport network is to be financially viable. It is clearly not. The key aim is for the network to be environmentally sustainable and funding to be sought for the changes needed to achieve this. Furthermore, to achieve the objectives of the LTP of modal shift some elements of the network will have to be financially subsidised.

We suggest the introduction is reworded as follows: ***'GCC will work with partners to maximise the opportunities for inward investment to deliver a transport network which promotes alternative more sustainable modes of transport than the private car.'***

The second bullet points should have the words added ***'in line with this LTP's priority objectives of mitigating climate change and encouraging modal shift'***

Overall, we believe that the tone of the policy is too soft relying on consultation rather than policy direction. This plan will be a material consideration in the formulation of Local Plans and in reviews of existing plans. The approach should therefore be ***'after consultation GCC will require'*** This particularly applies to the third and fifth bullet points.

While we do not object in principal to the aim of the penultimate bullet point referring to advertising, implementation will need very careful management. There should be a presumption against any advertising in open countryside or at key entry points to historic towns. Elsewhere, any advertising must be modest and designed to be compatible with the setting and avoid light pollution. There may also be highway safety issues arising from driver distraction.

PD 0.4. Integration with land use planning and new development.

The differentiation between PD 0.4 and PD 0.3 is unclear. This is because while PD 0.3 states that it is about funding the fourth and fifth bullet points are in fact about integrating transport restrictions/ requirements into plans. As we see it PD 0.3 is about money/ funding and PD 0.4 is about delivery through the planning system. It would be sensible to review the two policies together to make sure this differentiation is maintained and anything which is in PD 0.3 which is about planning be transferred to PD 0.4. For us the key difference lies in the introductions to the two policies. Because funding is a matter of negotiation (and in the case of developer prioritisation between contributions to transport infrastructure and other social benefits such as affordable housing) it is a subject for cooperative working. Planning on the other hand can be a requirement – this is expressed in the introduction to PD 0.4 which we support.

On specific bullet points:

- we are confused by the third bullet point which appears to cover two different subjects, viz working with parish councils/communities to mitigate effects and promoting high-density mixed-use developments etc. We support both but suggest

they are separated.

- the fourth bullet point should start '**GCC will not support**' rather than '*will be resisted*, which sounds powerless.

- the 11th and 17th bullet points requiring developer S106 and other contributions should be in policy PD 0.3.

PD 0.5. Community Health and Wellbeing.

We support this policy but suggest the introductory paragraph could be significantly shortened without loss of meaning or focus.

Numerous studies have now shown that simply going out into the countryside for recreation is very good for physical and mental health. Providing transport to access points is therefore important and should be specifically provided for in this policy.

Many of the bullet points require investment to have happened to provide for instance dedicated cycleways and footpaths. It will not be helpful to campaign for a shift if the facilities are not there for safe cycling.

While we totally support enabling access to the countryside for the less able this should not result in a significant inappropriate hard-surfacing of public footpaths. There needs to be an integrated approach consisting of providing transport to set points and then modifying or providing wheelchair friendly paths from that access. Care also must be taken to segregate walkers (particularly disabled) from horses and cyclists.

PD 0.6. Influencing travel behaviour.

As we stated in the introduction, influencing behaviour needs incentives (both positive and negative). This policy is based on persuasion. There is little evidence that that alone will be effective. If this is recognised in the introduction then Think Travel becomes the vehicle for incentivised change rather than the motivator.

In the 5th bullet point it is essential that there is public subsidy of the fares as otherwise operators will minimise the service and stifle uptake from the start. Changing behaviour requires sustained investment over a long period.

3) LTP Policy Documents (PDs). PD 1 to PD 6

a) PD 01 Public and Community Transport.

We agree that the underlying problem is that the provision of alternatives to the car is inadequate today, particularly in rural areas. We agree that technology (Think Travel) will help give better information on choices but if the choices are not there and competitive in terms of price, reliability and travel time there can be no uptake.

An example of the challenge is that there is significant commuting from many parts

of the Cotswolds to Gloucester for instance along the A40 from around Northleach but today looking at Think Travel the bus frequency for Northleach to Gloucester is only every 2 hours and the journey takes between 1hr 50 mins and 2 hours 40 mins versus 30 to 45 minutes by car. Furthermore, Table C sets the standards and effectively means that little will change in the more rural areas.

The policy does not include the concept of shared cars which might be a good intermediate solution. We welcome the proposal to pilot a demand responsive minibus service mentioned in para 3.1.10. The two concepts might go together.

The above examples emphasise the importance of the modal shift hub accepting that the first leg of to work journeys is going to be by car to Gloucester or Cheltenham.

Against this background we comment on the individual policy documents.

PD.1.1. Gloucestershire Bus Network.

The introduction to this policy is very weak, viz *'to provide realistic opportunities for travel choice by bus...'*. We suggest it should read ***'ensure that the choice for travel by bus is competitive in terms of cost, convenience and journey time'...***

Likewise, the policy actions should be stronger, particularly as they are largely under GCC's control. Bullet points 8 and 9 concerning bus lanes and other bus priority measures should be a commitment to deliver not an aspiration *'if feasible'*.

PD.1.2. Improving the quality of road based public transport.

We presume that GCC have some leverage over the bus companies through the franchising agreements. If that is true then the introduction to this policy could be more strongly expressed as ***'GCC will set the standards for and require ...'***.

The 2nd bullet point seems to have two different and unconnected actions. viz: quality of the bus service and introduction of traffic light priority at pinch points. The connection between the two needs to be clearer.

PD.1.3. Bus Priority

We strongly support this policy. Its success is key to making travel by bus more reliable and more attractive than travel by car. The introduction to the policy should not be weakened - it states in clear unambiguous terms what will be done. We are however concerned that the number of classes of vehicle in addition to buses which would be allowed to use bus lanes under bullet point 2 is excessive and would lead to congestion. Firstly, cycles should have a separate lane; experience in London has shown that cycles sharing a lane is dangerous because they delay traffic and are not seen when alongside larger vehicles. Private hire vehicles are no different to other cars unless they have multiple occupancy – they should only be allowed in bus lanes

if they have 3 or more occupants including the driver. Motorbikes should simply not be allowed – the case for their priority is not made and they also have little trouble making their way through congestion. Clearly emergency vehicles should have priority in all lanes.

PD.1.4 Coach Travel.

We have no comment on the policy. However, we note that in rural areas and in particular tourist hot-spots coach tours are often a menace rather than a benefit. They take up excessive space on narrow roads, create parking problems and often the tourists simply get out, walk around, take selfies and go. For example, the average spend from such coach parties in Bourton in the Water has been estimated to be as little as £2 per head. Longer stay coach parties are a different matter – the longer tourists stay the more they use the local shops and cafes. We suggest that local authorities be authorised to raise special levies on short stay coaches to defray the cost and inconvenience of accommodating them.

PD.1.5. Community Transport including voluntary car schemes.

We support the policy as written.

PD.1.6. Transport interchange hubs.

The network of strategic transport interchange hubs is vital and we support the network proposed. We are however surprised there is no proposed hub on the A40 entering Cheltenham from the east. This is a busy commuting route and will get busier over time. It is also not clear from the map which of the proposed hubs is located close to or at a station or whether these are in addition to those shown on the map - we assume the latter.

We would also point out that it is essential that the bus service from the hub is frequent (every 10 minutes in rush hour) – travellers to work are impatient.

On the policy itself we suggest the introduction should have the concept of incentivising use of the hub rather than the passive “providing the opportunity for choice”. This is particularly true for car travellers. Otherwise we support the provisions of the policy in particular the emphasis on priority for fast buses and penal parking rates for cars in city centres to incentivise use. However, these provisions clearly apply to the larger conurbations and would be inappropriate for the smaller market towns such as those in the Forest of Dean and Cotswolds where access to the town centre is quick and congestion is really a minor problem.

PD.1.7. Communicating Travel Information.

No comment.

b) Policy Document 2. Cycling.

We support the strategy of encouraging cycling by applying the principles on page 21. As we understand the key objectives of the LTP are relieving congestion and encouraging modal shift, the policy should be concerned primarily with functional cycling (getting to work or to a settlement centre for business or retail) as opposed to recreational cycling which is altogether different. Therefore, we suggest that GCC do not attempt to create a county-wide connected cycle network analogous to the road network but rather a more localised set of networks; cycling for work will be taken up predominantly over short distances, say up to 5 miles. As considerable investment will be needed because little of the network exists at present to the standards envisaged, it makes sense to concentrate on the highest use routes first and ensure that when any interchange hub is commissioned the cycle routes from it are already in place.

It also needs to be recognised that many of the potential cycle routes are in a considerable state of disrepair. An example is the Gloucester - Sharpness Canal towpath which will need widening, levelling and in some places the bank strengthening to make it fit to take a surface suitable and safe for cycling.

It also needs to be recognised regrettably that many of the major new residential developments have already been built or approved and they do not provide social infrastructure such as doctors surgeries, shops or schools. Residents will often have to travel 5 miles or more to access these services and it is simply unrealistic to expect mothers with children to cycle that sort of distance.

We suggest that the LTP has a separate policy covering recreational cycling and walking. The objectives of functional and recreational travel are very different: the former is about speed and convenience of getting from point to point while the latter is about leisure and enjoyment and often results in a circular route to get back to where you started.

PD 2.1 Gloucestershire's cycle network.

We support the policy in general but suggest the introduction makes clear that it is focussed primarily on functional cycling as opposed to recreational cycling (as we have defined above).

Bullet point 4. We do not see that the priority should be focussed on new development. The requirement on new development is that it should be cycle friendly and link to cycle routes into settlement centres. We do agree that the initial concentration should be on the higher density residential areas where the greatest concentration of take up can be expected. This point is picked up in the last two bullet points of the policy so the reference here seems redundant.

Bullet point 5. The term Quiet Lane is a specific designation for a minor country road which is nominated for recreational use by pedestrians and other users are encouraged to drive/cycle considerately. Effectively a Quiet Lane is a shared space.

There are a few in Gloucestershire but they do not form a network so we are surprised to see them identified here as cycle routes. We think this would be wrong and defeat their purpose. However, we wonder whether what is meant here is actually minor country roads which very often have little traffic.

PD 2.2. Cycle Asset Management. No comment

PD 2.3. Active travel safety, awareness and confidence. No comment

c) Policy Document 3 Freight.

There is a conflict between the strategy of increasing bus usage by giving priority to buses including bus lanes and other bus priority measures and ensuring smooth journeys for freight. None of the proposals in this policy recognise this; in our view the need for modal shift outweighs possible delays to freight.

We note that the pinch points listed in paragraph 3.1.6 do not include Moreton in Marsh – this location should be included as the A429 is now carrying a significant amount of freight traffic connecting the M40 to the A417/419 and thence to the M4.

We are glad to see and support the omission of the A417 through Fairford/Lechlade from the Advisory Freight Route map on page 14.

We totally support the use of technology to guide freight onto the most sustainable routes but wonder whether it can be proactive giving a warning when a vehicle strays on to unsuitable roads.

We recognise that the current infrastructure does not allow significant intermodal change for freight. That said any proposal for a major freight interchange and/ or a major lorry park should not be located within the county's AONBs or in any location which is clearly visible from them.

HGVs in particular have a significant visual impact when travelling across the landscape. Great care needs to be taken in designing new facilities both lorry parking areas and road improvements to ensure the damaging effects are mitigated by suitable choice of location, landscaping and/or screening.

The above points should be incorporated into the policies.

PD3.1 and PD 3.2 no comment in addition to the above.

PD 3.3. Driver Facilities.

We totally appreciate the need for properly equipped places for drivers to rest overnight. We however think it preferable to upgrade some of the current lay-bys and have a dispersed pattern of resting places rather than a small number of larger and highly concentrated facilities. This is partly because that will have a lesser impact

on the landscape and partly because drivers will inevitably continue to use the present network of lay-bys if that is more convenient.

Any facility whether an upgraded lay-by or a purpose made facility should be lit with discrete low-level down lighting, particularly for facilities in the open countryside.

PD 3.4 Driving Better Practice.

The problem of heavy vehicle access to building sites is not restricted to large developments. For many rural locations a modest development does engender a disruptive level of heavy vehicle traffic in relation to the often narrow minor roads. This can be compounded by the need for parking for site workers. We suggest firstly that consideration of these matters should be a material consideration before District Councils approve planning applications and that when approved there are conditions appropriate to the location on permissible routes to the site, driving speeds, codes of driving conduct and hours of access. One of the joys of our countryside is the network of small towns and villages and lanes leading to them. Careless construction traffic can cause damage to the highways and their verges which may take years to recover. These sentiments should be expressed as a separate bullet point covering rural locations.

PD 3.5 Managing Deliveries.

This policy applies almost exclusively to urban areas. For rural areas the issues are more about considerate driving given that delivery drivers are often on tight (some say unrealistic for the terrain) schedules. So in rural areas there would be great benefit in alternative pick-up arrangements and a trial project of such a service should part of this policy.

PD 3.6. Rail and Water Freight.

We accept regretfully that facilities to allow a significant modal shift from road particularly for freight movements which are through the county or for products being exported from the county do not exist. Nevertheless, the limited existing facilities should be retained and updated as far as possible, made more accessible and their use encouraged. We do not however think that a large new rail/road freight interchange can be accommodated in the county without significant disruption to communities and damage to the landscape.

d) Policy Document 4 Highways

There is much in this Policy Document that we support but do not comment on, such as the emphasis on safety. However, there is little recognition of the impact highways can have on the landscape. This is firstly visual – the intrusion of moving traffic into an otherwise tranquil vista. And secondly noise. Highways noise has a disproportionate effect on tranquillity in the open countryside where other background noise is minimal. We suggest these effects should be included first of all

in Table A (page 6) under the objective Protect and enhance the natural and built environment and then covered by policy guidance in the appropriate PDs.

The statement (para 2.2) on self-containment is misleading. A large proportion of traffic in the county is from one district to another. This is forecast to increase over the plan period as housing and employment are not co-located. Policy intervention is needed to reverse or contain this trend and contribute to alleviating greater congestion on the roads.

We are surprised that Figure D (page 12) does not show the A429 as an MRN. Our observation suggests the traffic numbers relate to an historic period not representative of the actual flows today. As we understand it the MRN will be eligible for specific funding and there are a number of projects on the A429 which are crucial.

PD 4.1 Gloucestershire's Highways Network

We suggest the introduction to the policy should include the concept of prioritisation of use. As written it is open to the interpretation that all users have equal priority – the overarching policies make clear that sustainable modes will have some priority at pinch points.

We do not think bullet point 3 should be caveated with '*where feasible*'. Clear intent to '*invest to make feasible*' is more in line with the plan strategy. As written it also appears to be in conflict with the intent in bullet point 9.

We are also concerned that the rigid application of the Link and Place spectrum will always afford local rural schemes low priority even though they may be very important in achieving other objectives such as dealing with rural isolation and promoting healthy lifestyle choices. We would ask that it be only one of a number of factors taken into account when prioritising investment schemes.

We fully support the application of the Green Infrastructure approach (bullet point 10).

PD 4.2. Highways Network Resilience.

We support this policy and note that Gloucestershire has some very good examples of the sort of eco-friendly schemes envisaged in the policy e.g. the Rural Sustainable Drainage Project in Stroud District. This innovative project reduces the risk of flooding in the Stroud valleys after high rainfall by slowing the rate at which water flows from smaller streams into the River Frome. Simple measures such as "leaky dams" and field bunds have been applied which are inexpensive to provide and visually acceptable, and they work!

PD 4.3 Maintenance.

This policy should include a commitment to installing new Quiet Surfaces when road maintenance/ resurfacing work is being done.

We also note that there is a reference to minimising the impact on the landscape (bullet point 10) but it is curious that this is under Maintenance when the major impacts should be considered (and avoided) at the design stage of new projects.

We support the commitment to enhancing and restoring wildlife habitats on verges. With the intensification of agriculture, the importance of road verges as refuges for wildlife and habitat connectivity has increased. We are pleased to note the intention that all verges should receive sympathetic management and not just those covered by GCC's Conservation Road Verges Site Register.

PD 4.4. Road Safety.

We support the policy but it omits the problem of rural lanes. Accidents on rural roads have been rising and this is often because drivers do not understand the need for self-imposed speed limitation. Many lanes have an unrestricted speed limit. This should be rectified and a policy commitment to do so be included. The most efficient way of doing so would be to invite parish councils to identify lanes where they think a speed restriction would be beneficial.

PD.4.5 On street parking.

Parking is a major issue but very different in urban and rural areas. This policy is both draconian and largely unworkable until the network of interchange hubs is in place and then it applies to urban areas. For rural areas driving into the nearest market town is the only way to get to shopping and some social activities. This means the provision of off street parking and management of on street parking are essential to maintain the vitality of the local market town network. The policy needs re-writing to make the distinction clear between urban and rural areas.

e) Policy Document 5. Rail

Clearly this whole policy area is not within GCC's control. The role of the County Council is mainly to lobby and persuade and frankly the arguments put in the policy document are not convincing enough to get Network Rail and the train operating companies to allocate scarce funds preferentially to Gloucestershire. The basic problem (para 2.3) is that all of the stations in the Severn Vale have significant limitations imposed by their locations. Certainly, the facilities could well be improved but a step change in the use of rail for passenger journeys requires a very significant investment in new and upgraded stations. This is mentioned as a hub south of Gloucester in paragraph 4.1.4 – we are not clear whether this would be close to Stonehouse or separate. If the latter then we do not see what purpose it serves.

We see an urgent need for a new station on the Bristol route at Stonehouse to serve the Stroud Valleys linkage to Bristol and the north.

The policy document should more strongly recognise the small but helpful contribution that heritage rail lines could make particularly in commuting into Cheltenham from the north and to Lydney in the Forest of Dean. These railways are independent and GCC can play a major part in enabling their development. They should therefore be subject to a specific policy aim not just related to tourism but to supporting their development as commuter lines.

We also note in para 3.11 that everything is subject to a rail investment strategy for Gloucestershire which is in preparation. So this policy document seems to be somewhat premature.

This policy document is therefore more a report of work in progress than a fully analysed strategy which the rail companies and regional bodies buy into. This is particularly true of **PD 5.1**.

We support the work programme in **PD 5.2** provided the hub south of Gloucester mentioned is actually a second Stonehouse station on the Bristol route. We see a second priority as the improvement of Ashchurch for Tewkesbury station and a regular hourly service as an essential component of the development of the proposed garden community.

We wholeheartedly support the work envisaged in **PD 5.3** in particular the imperative of having bus and train timetable co-ordinated even if this means putting on more buses.

f) Policy Document 6. Walk.

Many studies have shown that walking is good for physical and mental health and we enthusiastically support the outstanding and extensive network of footpaths in Gloucestershire being maintained and made accessible for all. But the vast majority of the footpaths are used primarily for recreation; we think it is simply confusing to include that use in the transport strategy.

This policy document needs to clearly distinguish between walking for a "transport" purpose, e.g. getting to work, and walking for pleasure and make it clear that the LTP focusses on the former as part of the strategy that includes minimising journeys by car. It also needs to clarify whether this policy covers the urban and close to urban environment.

We suggest that the only instance for including recreational activity in the LTP is when it co-exists with the road or cycle network.

If GCC wishes to include walking as recreational use in the LTP then it should be part of a separate policy as suggested above under "Cycling".

The Policy Document appears to treat cycling and walking as interchangeable.

(paragraph 1.3). This is false. In many cases they need to be separate, e.g. in most cities/towns cycling on the pavement is an offence. In Gloucestershire many of the rural footpaths and bridleways are rough and narrow trodden earth fitting with the countryside. As a principle only exceptionally should they be hard-surfaced to make them navigable by cyclists. In general that would be dangerous to walkers, as well as destroying their essential character.

As stated above under Highways, we consider that the expansion of the Quiet Lane network (**PD 6.1 bullet point 5**) would be beneficial and parish councils should be asked to make suggestions. Similarly, we have already commented on the danger of fast driving on country lanes. We support that this is extensively covered by different options mentioned in **PD 6.4**.

Finally, various conservation and access bodies should be included in partnership working on rights of way such as the Cotswolds Conservation Board and the Ramblers.

Otherwise we support the policies set out within the document.

4) Connecting places strategy.

a) Introduction.

The introduction includes a scheme of prioritisation which appears to be mainly cost based – the more expensive a scheme the more it is strategic. The driver is also the support for growth. We have commented above that the underlying growth assumptions are overly optimistic and have not been remotely achieved since the publication of the LEP's Strategic Economic Plan. The implication is that housing and employment will grow at a much slower pace than that underlying Local Plans including the JCS. Worldwide uncertainties reinforce the need for caution.

b) Countywide Strategic Schemes.

We support these schemes but note from Figure B that they are mainly focussed in the Severn Vale and in Stroud District. Such schemes are relevant to all areas particularly given the scale of some planned developments such as at Chesterton on the edge of Cirencester.

c) CPS1 Central Severn Vale.

This area rightly contains more transport projects than any other. We agree that there is little capacity for additional traffic on the highways network or scope to expand the network significantly. A consequence of congestion in and around the main urban areas is that there is currently only low use of buses because of extended journey times: overcoming this must be of the highest priority.

We strongly support transport ‘hubs’ at motorway junctions and other locations in order to encourage transfer to other modes of transport. But this approach will be ineffective if the projects which will give prioritisation to buses so they are a more attractive option than journeying on by car are not implemented simultaneously. We propose that each interchange hub and its related bus corridor improvement is seen as a single strategic project and is shown as such in the list of strategic projects given in Table 3.a. starting on page 32.

The majority of the remaining proposals listed are both sensible and welcome, including especially the development of the areas around both Cheltenham and Gloucester stations as transport hubs and of the Gloucester and Sharpness canal towpath as a pedestrian and cycle route south from Gloucester.

We welcome the early rail service improvements expected between Gloucester and Bristol as a result of funding for Metro West. The improvements to M5 junctions 10 and 11 are essential, in particular to support new developments planned in West and North West Cheltenham.

The focus on promoting increased cycling, including completing the Bishops Cleeve – Cheltenham – Gloucester strategic route is good as far as it goes but is never likely to be a mode of transport used by more than a minority of people.

The proposals for specific road junction improvements to reduce bottlenecks and improve traffic flow are supported, although experience says that this may only generate new bottlenecks elsewhere.

d) CPS 2. Forest of Dean

As stated earlier there is a complete mismatch between the number of houses which have been built and investment in the travel infrastructure to meet the resultant commuting on the A48/A40 route into Gloucester and beyond. This problem will only get worse over time if the emerging proposals in the Local Plan Review to build a further 8000 houses are implemented. Radical and inventive transport investment is required as well as a re-think of the way housing has been allocated to across the district. The plan seems to simply accept the status quo and attempt to mitigate the problems with minor schemes rather than tackle the fundamental causes of the congestion. GCC has a major role to play here.

We support the principle of a resolution of the Chepstow pinch-point problem which we feel can probably only be resolved via a new bypass incorporating an additional bridge over the River Wye. However, we also feel the whole matter must be approached as a transport led project with appropriate impact studies. It would be quite wrong if the driving force was funding from extensive new housing development which would lead to the creation of what would amount to a new suburb for Bristol given the lower house prices on this side of the Severn!

Our main concern over rail travel into and out of the Forest of Dean via Lydney is the need not just to increase service frequencies but also to establish better connectivity with other train services at Gloucester and Severn Tunnel Junction and with better bus links to more parts of the District via Lydney. We also feel the tourism and local transport role already played by the Dean Forest Railway should not be disregarded and with appropriate support it could play an increasingly important internal to the District role.

e) CPS 3. North Cotswolds and CPS 4. South Cotswolds.

We are commenting on the Cotswolds as a whole. The distinction between north and south Cotswolds is minor and the statistical base for travel information is only available for the whole district. That reflects in the list of opportunities which are identical except for the inclusion of Moreton in Marsh and Kemble stations respectively and even then they are shown having the same destinations which they do not – the only common destination is London. The two areas are linked by the A429 which is a backbone connection meaning many people in the North Cotswolds use Cirencester as the major retail hub.

We are astounded that the problems of the junctions on the A429 are classed as a local highway project. The problems of congestion at Moreton and Stow on the Wold are caused by the weight of through traffic from the M40 to the A417. The beneficiaries of the schemes are not housing growth in the area so much as the economy of small businesses. Resolving these bottlenecks should be seen as of “strategic” priority for Gloucestershire. The economy of the Cotswolds is growing faster and with a higher GVA per head than the rest of Gloucestershire. The GLIS also identifies that the landscape of the Cotswolds is a major part of the “magnet” attracting young talent to the county which will be needed to implement the strategy. Having clogged roads undermines that attraction.

For South Cotswolds we agree the schemes which have been included though we doubt whether a cycleway from Tetbury to Kemble will be used for commuting by any but the most enthusiastic. That said we support the use of the old railway line as a recreational route and extending on to Cirencester. We are also surprised that improvement in the bus service from Cirencester and its promotion does not feature on the list of projects.

f) CPS 5. Stroud.

Villages in the Cotswolds AONB along the escarpment need to be defended from large lorries taking short cuts through them instead of using the slightly longer route on a more major road, for example Stroud to Dursley over Selsley Common instead of using the A46/A4138 or going via the A419/A38. This is a prime example of where strong prohibitions rather than advice is needed.

The proposed new large developments in the Vale risk becoming dormitories. They need to include significant employment opportunities as well.

Renishaw, a major employer between Wotton under Edge and Charfield (South Gloucestershire), has no route/bus improvements proposed.

The alignment of the rail track at Cam and Dursley to allow provision of a loop for fast trains to overtake local stopping trains needs to be determined before planning for the Cam/Wisloe/Cambridge development is agreed. The land close to the east side of the station is already built over. There is a large Solar Array on the west side of the railway line.

The new transport hub proposed at Cam and Dursley station will presumably also need space and a much better – preferably new - access road. Box Road, the current access, is narrow, currently choked with parked cars and the connecting bus from Dursley to the station is frequently held up by traffic. This will be exacerbated by the major new developments being built along it which have not allowed for space to widen the existing road.

A second station at Stonehouse on the Bristol line would serve the significant commuting flow towards Bristol from the Stroud valleys. The former station could be reopened but a better option might be a new station on the north east side of Stonehouse where the London to Gloucester and Bristol to Gloucester lines merge. It would be easily accessible from the large developments west of Stonehouse. The current Stonehouse station platform is only long enough for short trains and the parking is very limited, spilling over into the adjacent housing estates. The centre of Stonehouse does not have much space for a high frequency bus link hub. If Stonehouse is to become an effective transport hub serious thought needs to be given to parking for users of the current station and long distance buses.

The Berkeley Vale, particularly Berkeley Marsh and round the Deer Park, have an attractive network of narrow lanes which are very well used by walkers, horse riders and cyclists. They are also popular with tourists and are also used by farmers who have patchworks of land holdings. They need Quiet Lane designation and Access Only restrictions for HGVs and vans to avoid being used as rat runs.

If it is planned to turn the canal tow path into a cycle/walking route the towpath will need significant widening in places – like the one along the Somme in France which has become a tourist attraction in itself. Currently the canal towpath has a number of very muddy sections. Since this is also part of the flood defences for the Berkeley Vale it will mean the river side of the canal embankment will need strengthening and widening – and perhaps raising to take account of this.

Charfield and Thornbury in South Gloucestershire are seeing huge developments impacting on junction 14 of the M5. This will need funding from Highways England to address its problems.

g) CPS 6. Tewkesbury.

We support the main focus in this area is on the need to solve the congestion problems at M5 junction 9 and along the A46/A438 corridor in order to overcome impact on economic growth. We note the references to the strategic upgrades proposed via the Midland Connect and Western Gateway initiatives, including the bid for government funding to improve this part of the A46. The document seems to take it as read that the solution will be a rerouting of the A46 away from the centre of Ashchurch as a new expressway linking to the M5. However, independent road traffic analysis concludes that most of the congestion in this area is the result of local and not long-distance travel. The success of the approach will therefore be critically dependent on the way the new expressway links to the Tewkesbury/Ashchurch urban area and on planned upgrades to the existing A46 route. It will be important to include steps to improve, rather than harm, the cohesiveness of the proposed garden community.

We welcome proposals to develop Ashchurch for Tewkesbury Station as a multimode hub, alongside increases in the frequency and connectivity of the rail service and provision and improvement to cycle routes, including into Tewkesbury and from Tewkesbury to Bishops Cleeve.

The map on page 102 (= page 423 of the overall document) shows a new road west of the M5 just north of Tewkesbury but this does not seem to be further explained.