

Consultation Document

Thank you for taking the time to respond to the first formal review of Gloucestershire's third Local Transport Plan (LTP). The LTP sets the long term strategy for transport delivery within Gloucestershire from 2015 to 2031. Within this consultation document a significant number of changes have been made from the existing LTP which was adopted in 2011.

This consultation process seeks to understand the level of support for the proposed changes relating to:

- The proposed Link and Place Hierarchy for 2031;
- The proposed update to the LTP's policies;
- The proposed prioritisation of transport initiatives in the context of the new Connecting Places Strategies (CPS); and
- The removal of historic transport schemes from the highways register.

N.B. You do not need to respond to all questions Simply respond to whichever issues are of interest to you. See Appendix A of the LTP Consultation document to identify the Town and Parish's in each CPS area.

Having your say

This phase of consultation will last for six weeks from 16th February until the 27th March 2015. You can register your views.

- Using the County Council's consultation portal - www.gloucestershire.gov.uk/consultations
- Downloading the documents from the County Council's website - <http://www.gloucestershire.gov.uk/ltp3> and emailing your response to ltp@gloucestershire.gov.uk
- Accessing a paper copy from Gloucestershire Libraries or Council buildings and sending a completed questionnaire to

Strategic Planning

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Gloucestershire’s - Local Transport Plan (2015 – 2031) Consultation Questionnaire

About you

Do the views you are expressing here represent personal views or those of an organisation?

Indicate your response by ticking the appropriate box.

Personal:	Tracey Crews – Head of Planning
Organisation:	Cheltenham Borough Council
If you wish to be added to the LTP Stakeholder list please provide your contact details: tracey.crews@cheltenham.gov.uk	

Question 1

Do you agree with the proposed Link and Place Hierarchy for 2031?

- Please see Section 1 (page 2) of the LTP Consultation document.

Strategy	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Link and Place Hierarchy for 2031	1	2	3	✓ 4	5
Comments: Support for the focus on quality of place and providing the conditions for economic growth. This reflects the ambitions of the Cheltenham Corporate Strategy, Gloucester, Cheltenham and Tewkesbury Joint Core Strategy and emerging Cheltenham Plan. However it is not clear how the assignment of the trunk road network from red to amber will be achieved. The Cheltenham Borough Council Walking and Cycling Scrutiny Task Group has been investigating how Cheltenham can be a place for people, this requires significant changes to encourage active travel choices to be facilitated. The findings of this group will not be available until later this summer, however initial findings include: <ul style="list-style-type: none"> • Evidence presented to the group by Rod King, of the 20s Plenty campaign, suggests that introducing default lower speed limits in urban areas encourages the development of spaces in which people use sustainable transport rather than cars. We would encourage the county council, if it is truly seeking to create a ‘place for people’, to pursue a policy of introducing a default 20mph limit in the borough. The group would recommend that, in line with practice elsewhere, the county seeks funding from health authorities to help pay for a scheme 					



- The group has heard evidence that positive promotion of cycling should be used to encourage a change in mindset. The choice of cycling should be made to look attractive and normal, rather than a niche pursuit.
- Having heard evidence from county council officers, the group would question why the trial scheme for removing traffic lights in St Margaret’s Road was not made permanent. Anecdotal evidence suggested the trial was a success from a pedestrian perspective, regardless of the apparent lack of car journey time improvement. However, it should be considered that a solution to the problem of a reduced cycle links resulting from the trial would need to be solved.
- The group would encourage the removal of as many pavement railings as possible, to encourage the free movement of pedestrians across the town. Pedestrians should be enabled to cross in places they find convenient, rather than being considered as a secondary thought after the convenience of motorists. As part of this, we must seek to discourage pavement parking, which discourages walking and is particularly discriminatory to those who use wheelchairs or have other mobility problems, as well as parents with prams.
- For pensioners, the condition of pavements is a key factor in influencing both sustainable transport use and also social inclusion. Poorly maintained pavements discourage the elderly from walking, which in turn can lead to exclusion.

Question 2a

Do you agree with the proposed Advisory Freight Route Map?

- Please see Section 2, Figure 5 (page 15) of the LTP Consultation document.

Strategy	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Advisory Freight Route Map	1	✓ 2	3	4	5

Comments:

Based upon the detail presented there is insufficient detail to provide commentary on the draft advisory freight map. Some additional detail has been provided, however all details are not confirmed. The Council therefore reserves the right to provide a view once this detail is made available in an appropriate format.

The information provided by the county makes reference to ‘gateway schemes’, but the details are unclear and no clear reference provided within the consultation documents. This needs to be provided.

Freight should be encouraged on strategic routes designed to take the size and number of vehicles. The focus of the freight map is on effective implementation by hauliers and lorry companies; however there is evidence in Cheltenham that limited notice is given to existing freight routes resulting in inappropriate vehicle movements thus generating additional traffic on routes unsuitable for freight, pollution and danger to other road users and pedestrians.

The Cheltenham Transport Plan is awaiting a trial, it would therefore be prudent to reassess the freight route once the Boots Corner trial has been completed and evidence available to inform.



Question 2b

Should any changes be made to the Advisory Freight Map?

Comments:
Based upon the detail presented there is insufficient detail to provide commentary on the draft advisory freight map.

Question 3a

Do you support the proposed LTP Policies?

- Please see Section 2 (page 18) of the LTP Consultation document.
- Also see Appendix D (page 129) for detailed policy proposals

Strategy	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
LTPP1 Network Management – Operation	1	2	3	✓ 4	5
LTPP2 Network Management - Investment	1	2	3	4	✓ 5
LTPP3 Enabling New Development	1	2	3	✓ 4	5
LTPP4 Network Connectivity	1	2	3	✓ 4	5
LTPP5 Improving Health and Wellbeing	1	2	3	4	✓ 5

LTPP6 Carbon Reduction and the Environment	1	2	3	4	✓ 5
LTPP7 - Enabling Travel Choice	1	2	3	✓ 4	5
LTPP8 - Travel Information	1	2	3	4	✓ 5

Question 3b

Do you think there are any policy areas missing?

- See Appendix D (page 129) for detailed policy proposals

Comments:

This section should reflect that LTP is part of a suite of documents influencing the movement and management of transport. Reference should be given to the relevant development plans statutorily prepared by the district councils.

LTPP1

- Fully support expeditious movement of traffic, but no reference has been made to sustainability in this context.
- Policy only covers the statutory duties of the county council, is this not lacking ambition and contradict the objectives of LTP?
- As noted by the Cheltenham Borough Council Walking and Cycling Scrutiny Task Group, health is a key output of transport interventions and policies; this is missing from this list of partners the county council will work with.



LTPP2

- Policy is supported, but the onus is on the county council to speed up negotiations on S106 with applicants. Cheltenham Borough Council is currently reviewing its approach to negotiating S106 and evidence indicates delay on county council negotiations.

LTPP3

- Approach reflects Gloucester Cheltenham and Tewkesbury Joint Core Strategy, in particular policies INF1 and INF2.
- Policy should be drafted more positively, 'GCC encourages innovative and attractive development'. The delivery of attractive development should be the default position.
- Reference should be given to the initial findings of the Cheltenham Borough Council Walking and Cycling Scrutiny Task Group – see points raised at question 1.
- Travel choices will only be realistic if there is seamless transfer from one mode to another.
- Journey choices should include rail and the integration of rail and road
- Do the parking Boards exist? How are they going to be resourced?

LTPP4

- See comments above regarding integrated transport.
- The inclusion of rail is not explicit, policy reads as a reference to roads. Investment is needed to bring about station improvements.
- Support inclusion of park and ride; however the likelihood of delivery without intervention by the county council is minimal. How does this fit within the context of sustainable development and the effective management of traffic on the network?

LTPP5

- This policy is supported.
- Reference should be given to the initial findings of the Cheltenham Borough Council Walking and Cycling Scrutiny Task Group – see points raised at question 1.
- Encouraging active travel and use of sustainable modes requires the

creation of high quality and attractive public realm, both links and places. This needs to be recognised in these policies and throughout the document.

LTPP6

- Policy supported
- The creation of high quality streets and spaces and proper management of green infrastructure (including highway trees) is an important element managing air quality and noise pollution.

LTPP7

- This policy is supported.
- Reference should be given to the initial findings of the Cheltenham Borough Council Walking and Cycling Scrutiny Task Group – see points raised at question 1.
- Cultural change is at the heart of LTPP7, such a change will be delivered most effectively by the younger age groups within our population. To affect change across all age groups the focus must be on seamless transfer between modes and ease of payment where relevant.

LTPP8

- Policy supported

Question 4a

Do you agree that the Central Severn Vale CPS identified meets the proposed LTP objectives?

- Please see Section 3.1 of the LTP Consultation document.



LTP Objectives	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Secure conditions for sustainable economic growth in Gloucestershire	1	2	3	4	✓ 5
Enable communities to benefit from economic prosperity	1	2	3	✓ 4	5
Conserve and enhance Gloucestershire's unique natural, built and historic environment	1	✓ 2	3	4	5
Create healthy, safe and engaged communities	1	2	✓ 3	4	5

Comments:
 Broadly the LTP objectives reflect the ambitions of the Cheltenham Corporate Strategy, Gloucester, Cheltenham and Tewkesbury Joint Core Strategy and emerging Cheltenham Plan. The concern is whether the policies proposed by the LTP will have the teeth to deliver real change within the CSV area.

While the objectives make reference to sustainable transport overall the report lacks any depth in terms of analysis of sustainability and there seems little carryover of sustainability objectives into the LTP policies.

The policies give limited sense that transport and highway assets (street scene,

tree cover etc.) will be managed in a manner that acknowledges Cheltenham as a “place for people” and that there will be a significant shift towards the pedestrian being “dominant” and sustainable travel use being “strong”. The designation of Cheltenham as a “place for people suggests not only a shift in the type of transport infrastructure provided, but also the creation of decent streets, spaces and transport nodes; plus “sensitive” management of assets such as tree stock and the streets themselves

Given that Gloucester, Cheltenham and Tewkesbury have worked in partnership to deliver the Joint Core Strategy and given that the LTP has utilised the transport modelling of the Joint Core Strategy, would it not make sense to include Tewkesbury within the CSV?

CPS overview – opportunities identifies pedestrian and cyclist accessibility, but this has not been linked to integration with public transport. The LTP needs to better spell out the integration of all transport modes and how its policies and interventions can enable and deliver improved mode transfer and supporting facilities.

Future pressures – pleased to see context of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy set out and the use of the transport modelling undertaken to understand the impact of traffic. It would be helpful to flesh out this context to explain the pressures caused by existing development. The Joint Core Strategy can plan for mitigating the impact of new development, but it cannot mitigate against existing problems on the transport network as a result of existing traffic demands.

As noted elsewhere in this consultation response behavioural change is essential if change in culture is to be implemented and maintained, as such behavioural initiatives require investment and support. The area wide initiatives listed on page 31 recognise this, but the table fails to recognise the role of the county council. This should be amended.



- Specific initiatives
- Town Centre Initiatives
 - St Margaret’s Road Corridor – traffic signal removal should be reconsidered;
 - Albion Street – pedestrian connection improvements;
 - High Street/Clarence Street/Promenade/North Street (Boots Corner) – pedestrian improvements and highway improvements need to be included (subject to TRO outcome).
 - A4019 Corridor Initiatives
 - Active Travel – Cycle link improvements (JCS strategic site development)
 - Bus – Bus corridor/junction and signal improvements (JCS strategic site development)
 - Park & Ride – New P&R site (JCS strategic site development)

Enable communities to benefit from economic prosperity	1	2	3	4	5
Conserve and enhance Gloucestershire’s unique natural, built and historic environment	1	2	3	4	5
Create healthy, safe and engaged communities	1	2	3	4	5

Comments:
No comments

Question 4b

Do you agree that the Forest of Dean CPS meets the proposed LTP objectives?

- Please see Section 3.2 of the LTP Consultation document.

LTP Objectives	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Secure conditions for sustainable economic growth in Gloucestershire	1	2	3	4	5

Question 4c

Do you agree that the North Cotswold CPS meets the proposed LTP objectives?

- Please see Section 3.3 of the LTP Consultation document.

LTP Objectives	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Secure conditions for sustainable economic growth in Gloucestershire	1	2	3	4	5



Enable communities to benefit from economic prosperity	1	2	3	4	5
Conserve and enhance Gloucestershire's unique natural, built and historic environment	1	2	3	4	5
Create healthy, safe and engaged communities	1	2	3	4	5

Comments:
No comments

Question 4d

Do you agree that the South Cotswold CPS meets the proposed LTP objectives?

- Please see Section 3.4 of the LTP Consultation document.

LTP Objectives	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Secure conditions for sustainable economic growth in	1	2	3	4	5

Gloucestershire					
Enable communities to benefit from economic prosperity	1	2	3	4	5
Conserve and enhance Gloucestershire's unique natural, built and historic environment	1	2	3	4	5
Create healthy, safe and engaged communities	1	2	3	4	5

Comments:
No comments

Question 4e

Do you agree that the Stroud, Stroud Valleys and South of Stroud CPS proposed LTP objectives?

- Please see Section 3.5 of the LTP Consultation document.



LTP Objectives	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Secure conditions for sustainable economic growth in Gloucestershire	1	2	3	4	5
Enable communities to benefit from economic prosperity	1	2	3	4	5
Conserve and enhance Gloucestershire's unique natural, built and historic environment	1	2	3	4	5
Create healthy, safe and engaged communities	1	2	3	4	5

Comments:
No comments

Question 4f

Do you agree that the Tewkesbury CPS meets the proposed LTP objectives?

- Please see Section 3.6 of the LTP Consultation document.

LTP Objectives	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Secure conditions for sustainable economic growth in Gloucestershire	1	2	3	4	5
Enable communities to benefit from economic prosperity	1	2	3	4	5
Conserve and enhance Gloucestershire's unique natural, built and historic environment	1	2	3	4	5
Create healthy, safe and engaged communities	1	2	3	4	5

Comments:
Given that Gloucester, Cheltenham and Tewkesbury have worked in partnership to deliver the Joint Core Strategy and given that the LTP has utilised the transport modelling of the Joint Core Strategy, would it not make sense to include Tewkesbury within the CSV?



Question 4g

Do you agree that the Out of county CPS meets the proposed LTP objectives?

- Please see Section 3.7 of the LTP Consultation document.

LTP Objectives	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Secure conditions for sustainable economic growth in Gloucestershire	1	2	3	✓ 4	5
Enable communities to benefit from economic prosperity	1	2	3	✓ 4	5
Conserve and enhance Gloucestershire's unique natural, built and historic environment	1	✓ 2	3	4	5
Create healthy, safe and engaged communities	1	2	✓ 3	4	5

Comments:

Fully support the need to look beyond the boundaries of Gloucestershire to plan for transport. This is essential in supporting economic growth; however again, this section fails to place the out of county connecting places strategy within the context of sustainability. Page 85 references the promotion of sustainable transport solutions, this needs to be more positive.

Pleased to see missing link, M5 junction 10 and freight movements noted as strategic transport issues.

Active travel - Reference should be given to the initial findings of the Cheltenham Borough Council Walking and Cycling Scrutiny Task Group – see points raised at question 1.

Table 5 – Improvements should be made to car parking and train frequencies at all county stations to encourage modal shift and discourage car journeys to out of county stations. Page 24 (CSV Overview) identifies poor rail service to Worcester; Table 5 makes no reference to how this might be addressed.



Question 5

Do you agree with the deletion of the schemes from the county’s Highways register?

- Please see Section 4 (page 92) of the LTP Consultation document.

CPS Area	Initiative type	Initiative description	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
CSV	Bus	Quality Bus Corridor Tewkesbury-Bishops Cleeve-Cheltenham	1	✓ 2	3	4	5
	Behaviour	Travel Choice - Car Club in Cheltenham & Gloucester	1	✓ 2	3	4	5
	Highways	Cheltenham Northern Relief Road 1B2	1	✓ 2	3	4	5
	Highways	Cheltenham Northern Relief Road 4D	1	✓ 2	3	4	5
Forest of Dean	Bus	Quality Bus Corridors - Various routes	1	2	✓ 3	4	5
North Cotswold	Bus	Quality Bus Corridor - Moreton in Marsh-Cheltenham	1	2	✓ 3	4	5
South Cotswold	Bus	Quality Bus Corridor - Cirencester – Gloucester	1	2	✓ 3	4	5
	Highways	A436 Ullenwood junction capacity improvement	1	2	✓ 3	4	5
		A417 - Lechlade Bypass - New road scheme	1	2	✓ 3	4	5
		Cotswold Water Park Eastern Spine Road, Kempsford	1	2	✓ 3	4	5
Stroud	Bus	Quality Bus Corridor - Cheltenham - Stroud - Gloucester	1	2	✓ 3	4	5



Comments:

Are there no initiatives on hold for the CSV? Given the approach taken to park and ride in this version of the LTP - the removal of county funding and reliance wholly on third party operators, Cheltenham Borough Council would assume that it would be listed as an initiative on hold. Consider that park and ride continues to play a role in the package of sustainable transport options and traffic management and it disappointing that this is no longer represented in a way that can be effectively delivered through the LTP.

Initiatives not being addressed

Quality bus corridor – the removal of this initiative is not supported. Quality bus corridors are an important part of transport infrastructure and moving this to rely only on partnership working removes the commitment to deliver quality bus services.

Car club – is the removal of this initiative based upon evidence elsewhere in the UK? Was the limited demand based upon active marketing of the initiative? Discussions through the LSTF suggested a desire to trial a car club in Cheltenham, despite the recent closure in Gloucester. Development opportunities and population growth in the town centre suggest that there may be a market and encouragement should be given to seek localised provision through development opportunities.

Cheltenham northern relief road – Given the proposed urban extension at North West Cheltenham and safeguarding of land up to the M5 in this location post 2031, would the preferred option not be to put this initiative on hold rather than delete? This would enable testing of interventions to address the impact of the development at NW Cheltenham and not closing future options ahead of the evidence.

Arguments against wider 20mph zones have included concerns that enforcement is not feasible; enforcement is likely to require the same resources as 30mph zones and is an unconvincing argument.



Question 6

Do you agree with the Asset Management Framework of documents?

- Please see Appendix C of the LTP Consultation document.

LTP Objectives	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Transport Asset Management Plan (TAMP)	1	2	3	✓ 4	5

Comments:
Principles are sound, but question the ability to deliver in the context of funding available.

Section 1.5 “Strategy for Roads and Footways” in its section “Fit for Purpose” refers specifically to the fitness for purpose of high volume/high speed A-roads, for “motorist” needs. The criteria needs to be sufficiently robust to allow an assessment of need which equally considers the fitness for pedestrians, disabled people and cyclists of roads and footways on their desire lines, particularly in urban areas.

Question 7

Do you agree with the proposed Levels of Service for Highways Maintenance as set out in the Asset Management Strategy?

- Please see Appendix C of the LTP Consultation document.

LTP Objectives	Strongly disagree	Disagree	Neither agree or	Agree	Strongly agree

			disagree		
Roads and footways	1	2	3	✓ 4	5
Highway structures	1	2	3	✓ 4	5
Drainage and surface water management	1	2	3	✓ 4	5
Winter maintenance	1	2	3	✓ 4	5
Street lighting	1	2	✓ 3	4	5
Highway environment	1	2	✓ 3	4	5

Comments:
Agree the basic standards established, subject to the following points:

Roads & Footways – Service level needs to halt patching with inappropriate materials in conservation areas. Also needs to accommodate opportunities for locally funded enhancement of materials where appropriate.

Drainage –bi-annual cleansing of urban gullies is an acceptable standard, but in Cheltenham, that standard is not currently being met in many important locations.

Lighting – column and lamp-head replacements in conservation areas needs special consideration in terms of appropriate design.

Trees – agree the basic service levels indicated. However, in Cheltenham there is an agreed local protocol covering highway tree management; and annual inspection regime for trees in the Promenade; both local agreements need to be acknowledged. An enhanced inspection regime on the A40 approach to Cheltenham should also be considered.



Question 8

Are there any further comments you wish to make regarding the LTP Review?

Comments:

The LTP is an important document in managing transport, working alongside the statutory development plans of the districts of Gloucestershire. Cheltenham Borough Council is pleased to see the reorientation of the plan towards supporting economic development and improving quality of place. However, the Council is disappointed in the lack of analysis in regards to sustainable development and ensuring that this is a strand which connects all parts of the plan. This seems to be a key missing from the consultation document.

Whilst policies are included regarding rail, this isn't represented as part of the delivery of an integrated transport response. The Borough Council would like to see policies in the LTP which will enable a seamless transition from one mode to another. As currently drafted it is not clear how this will be delivered.

Cheltenham Borough Council has invested elected member and officer time, together with time from individuals with key areas of expertise through the work of the Walking and Cycling Scrutiny Task Group. This group has been investigating how Cheltenham can be a place for people thereby working within the objectives of LTP3 review, this requires significant changes to encourage active travel choices to be facilitated. The findings of this group will not be available until later this summer and the Council kindly request that the findings can be incorporated into the next published version of the LTP

