



Gloucestershire's draft Local Transport Plan - Consultation This consultation will run from 20th November 2015 to 5th February 2016

The draft Gloucestershire Local Transport Plan (LTP) outlines the county council's priorities for transport delivery between 2015 and 2031. It reflects the views expressed through consultations held between 2014 and 2015, and sets out the strategic context for how people will be able to travel and access jobs, goods and services up to 2031.

This is the final stage of the LTP review. Following this consultation the plan will be put forward to Full Council for adoption during the spring of 2016.

How to complete the questionnaire:

Go online to: www.gloucestershire.gov.uk/ltp3 and submit your comments electronically. Electronic copies of the consultation material will be available to view on the website.

Or

Submit handwritten feedback using this form as follows: 3333

- Please comment on the documents individually under the relevant title
- Please identify the paragraph you are referring to in your response
- Return your completed questionnaire to the reception desk or send it to the address below

Strategic Planning (Block 5, 1st floor)
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Responding as an organisation ?	Post Code / Area: GL50
Name of organisation Cheltenham Borough Council	Your name: Tracey Crews – Director of Planning

Overarching Strategy

1) Draft Overarching Strategy

This draft strategy acts as guidance for anybody requiring information on how the County Council will manage the transport network in Gloucestershire up to 2031.

Do you have any comments on the Draft Overarching Strategy?

Growing Gloucestershire's Economy: This section should provide greater recognition that in many cases transport infrastructure is the most critical component in unlocking development sites that can deliver this economic growth.

New development will also present transport opportunities, such as helping to provide and attract funding for transport investment and improving the viability of transport infrastructure – particularly bus and rail – development is not just about presenting challenges.

Cheltenham Borough support the transport priorities listed. However, given the JCS policy which establishes growth at Ashchurch it would better support the delivery of the JCS if this station was included in supporting the delivery of sustainable development over the period of the LTP.

It is disappointing to note that the previous reference to district level Parking Boards has been deleted. Cheltenham Borough Council is keen that there should be a forum (eg Highways Board) where not only parking matters but more general highways issues relating to Cheltenham can be discussed. This is subject to current discussion with Gloucestershire County Council as part of the devolution process.

This section makes reference to evidence in regards to LEP and views around development at junction 10. The JCS and supporting local plans are helping to facilitate demands for new employment through the release of new land with clear reference to the M5 growth corridor as set out in the SEP. Any future development in and around junction 10 is directly related to an upgrade to an all movements junction enabling movements north and south. The Borough Council supports the investigations to determine the business case for the upgrading of M5 junction 10.

This section rightly points out the costs of transport infrastructure and the funding gap identified. The LTP should look to all possible sources of funding to address this. It is noted that traditional funding streams are listed, but others are available and should be pursued, for example through health budgets.

Inclusion of broadband in helping to deliver economic growth is supported, however slow speeds are not limited to rural areas. There are areas of Cheltenham falling outside the Fastershire Broadband Project and this needs to be picked up; the DCMS's Super Connected Cities Broadband Voucher Scheme has been operating within the County's urban areas as one way to help deal with this issue, but is now halted.

LTP Objectives and expected outcomes: Reference to 'urban retail areas' should be changed to urban centres or urban service centres to recognise the wide range of facilities and services offered in the centres. It is not only retail.

Transport schemes should be designed not only to "reduce the adverse impact of transport" but, where appropriate and within budget, to have a positive impact on and enhance the quality of the County's natural, built and historic environments. This section could reasonably be retitled "Conserve and Enhance the Environment". This will apply throughout the LTP and its policy documents.

Although walking has a section in the Highway PD and is mentioned as an outcome in the health objective, it is not recognised in a separate policy document. Walking is an important mode in Cheltenham (15 % travel to work in 2011 census) and requires individual consideration. One of the criticisms of Cheltenham Borough Councils Overview and Scrutiny Walking and Cycling Task Group was the lack of specific attention given to walking in policy terms in its own right and the impact that has on initiatives.

Although modal shift is the sub text of the objectives modal shift away from the car should be an overriding objective.

LTP Challenges: The challenge of supporting sustainable economic growth should recognise the role of transport plays, including unlocking development potential.

The challenge of community connectivity should also to be to ensure that individuals have access to social and leisure opportunities.

The challenge of conserving the environment needs to recognise the positive impact of high quality environments on active travel. Encouraging active travel and use of sustainable modes requires the creation of high quality and attractive public realm, both in links and places. This needs to be recognised in these policies and throughout the document. The Conserve challenge also needs to embrace *enhancement* of the environment.

Delivery Priorities: It would be useful to specifically recognise the role of Highways England and their funding streams in helping to deliver transport projects – i.e. through their Route Based Strategies and Road Investment Strategies.

There should be flexibility over the delivery phases in which projects are

placed. This would be to recognise that some projects may be required earlier or later than envisaged depending on when the need for them arises i.e. when large developments come forward.

The reference to CIL is negatively worded. If the growth agenda is to be successful in delivery it is critical that all the relevant agencies work proactively together in agreeing priorities. As stated earlier in the overarching strategy there is a funding gap for transport infrastructure. All agencies must work constructively and creatively to address this gap. Discussions are ongoing via the Gloucestershire Economic Growth Joint Committee on the delivery of strategic infrastructure and CIL. This ongoing engagement and joint working should be recognised.

Countywide Short-term capital delivery priorities (2015 to 2021): The housing trajectory for the JCS envisages that all of the Strategic Allocation sites will be delivering significant amounts of new development within the 2015-2021 periods. It will therefore be important that the short-term delivery priorities set out through the LTP include any necessary infrastructure improvements to deliver these sites. Particularly corridor improvements on the A4019 (Tewkesbury Road) and A46 (Shurdington Road) around Cheltenham and the A38 (Tewkesbury Road), B4063 (Cheltenham Road East) and Innsworth Lane around Gloucester.

The inclusion of 20mph zones is supported and responds to advice provided by Cheltenham's Walking and Cycling Overview and Scrutiny Group; the Borough Council has passed a resolution to explore opportunities for 20mph zones in the town. Gloucestershire County Council should note that it is practice elsewhere, to seek funding from health authorities to help pay for a scheme.

The inclusion of the Cheltenham Transport Plan and Cheltenham Spa Railway Station Enhancements are supported. However, there is no reference to Cheltenham bus station. Improvements to the interchange

facilities are being actioned by the Borough Council, but the role it plays as a strategic interchange should be recognised by the LTP. Access improvements linking Honeybourne Line to A40, Cheltenham should also recognise that this offers the opportunity for access improvements to Cheltenham Spa Railway Station. Countywide Short-term capital delivery priorities (2015 to 2021): To support delivery of the JCS and support a sustainable transport strategy Ashchurch Station should also be included as a short-term priority to improve the standard of the station for its users. Countywide Medium-term capital delivery priorities (2021 to 2026): The A46 (Shurdington Road) and A46/A438/M5J9 corridor improvements are included in this medium term period. However, strategic allocations are expected to deliver new development within the short-term time period and therefore it is essential that the appropriate infrastructure is delivered to support these sites and not delay delivery. Therefore corridor improvements in these locations (or at least elements of them) may be required at an early timescale than set out in the LTP. It is noted that a number of schemes that would directly relate to the delivery of the JCS strategic allocations are included within the long-term priority period. Namely this includes the A40 Longford Roundabout, A417 Brockworth Bypass/A46 Shurdington Road, A4019 Cheltenham, and B4063 Churchdown. Bus priorities should include work with Cheltenham Borough Council and partners to implement enhanced quantity and quality of coach facilities in Cheltenham as an important element in the development of the town centre economy through tourism. Welcome the inclusion of bus advantage at Lower High Street Cheltenham

where this assists with improved movements, but has this been modelled with outputs from the Cheltenham Transport Plan? This area needs better management to facilitate free movement and deliveries etc. not further restrictions on movement. Request further consultation with Cheltenham Borough Council and the Cheltenham Development Task Force Lower High Street Action Group. Is the blight on 453 High Street reserved for traffic widening to be removed?

Support improved service linking to Bristol, but this must extend to Cheltenham given its predominance in passenger numbers.

Countywide Long-term capital delivery priorities (2026 to 2031): Strategic park and ride expansion for Cheltenham is supported. However, the strategic park and ride scheme at Uckington is listed as a long term priority. This risks undermining the sustainable transport options and reduction in car journeys offered by earlier delivery through the North West Cheltenham Urban extension – it is suggested that Uckington P&R is included within Short-Term priorities.

Do not understand why Junction 10 is listed for the period 2026 – 2031. A task group is now in place to develop the business case for an all movements junction and when the latest SATURN model is available, junction 10 will be tested (later this year). The outputs of the modelling and discussions from the task group will feed into Highways England funding priorities (to be worked up by 2018) which, if junction 10 is successful, will be included in the funding strategy for 2021.

A4019 Honeybourne Railway Bridge – height clearance – is this instead of removing stanchion? If so can we remove the blight affecting number 453 Lower High Street? This would be supported by Cheltenham Borough Council.

LTP Monitoring Indicators: Indicators should include Increased use of

walking.
Currently measuring points for use of cycling are sparse. It is suggested
that a more comprehensive set of data collection locations is established.

Connecting Places Strategies

2) Draft Central Severn Vale Connecting Places Strategy

This draft strategy acts as guidance for anybody requiring information on the County Council's priorities for transport Cheltenham, Gloucester, Churchdown and Bishop's Cleeve.

The document sets out the aspirations for the Central Severn Vale Connecting Paces Strategy area up to 2031.

Do you have any comments on the Draft Central Severn Vale Connecting Places Strategy?

The Place: Even more explicit reference should be made to the JCS proposals and strategic allocations and the impact that this would have on local and strategic infrastructure. In addition it is considered that stronger reference should be made to importance of transport infrastructure in unlocking development sites and delivering growth. At the moment the text refers to impact and managing this growth but transport infrastructure is key to delivering this growth.

In setting the Place context for transport in the CSV, the LTP should indicate that Cheltenham is a relatively flat, compact urban area which suits active travel modes. It has a large Regency urban core, designed as a piece, which has a robust permeable street structure ideal for walking and cycling. This structure is enhanced by the attractive quality of many of the streets—tree-lined and landscaped, flanked by well-preserved Regency architecture, presenting a pleasant environment for walking and cycling.

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

Issues include:

• a fragmented cycle network in Cheltenham.

 Negative impact of the inner ring road on radial walking and cycle routes into Cheltenham town centre

Short-term priorities (2015 to 2021): Access improvements linking Honeybourne Line to A40, Cheltenham should also recognise that this offers the opportunity for access improvements to Cheltenham Spa Railway Station.

The strategic park and ride scheme at Uckington is listed as a long term priority. This risks undermining the sustainable transport options and reduction in car journeys offered by earlier delivery through the North West Cheltenham Urban extension – it is suggested that Uckington P&R is included within Short-Term priorities.

The Cheltenham Borough Council Walking and Cycling Overview and Scrutiny Task Group has questioned 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.

Typo – Tewkesbury Road is referred to as A435.

Medium-term priorities (2021 to 2025): JCS strategic allocations at Leckhampton and Brockworth will have an impact on traffic accessing the A46 into Cheltenham. Both of these sites are expected to delivery in the short-term time period. It is important that the necessary infrastructure improvements are delivered to enable the development of these sites. Therefore it may be necessary for corridor improvements to be made in a shorter timescale to deliver

growth in a timely manner. It is felt that this should be moved toward the short-term priority list. Medium term priorities should include working with partners (including Cheltenham Borough Council) to improve coach drop off and parking facilities – an important contributor to the town centre economy. Long-term priorities (2026 to 2031): A number of highway schemes set out in the long-term priority list would be directly related to JCS strategic allocation sites around the Cheltenham and Gloucester. It is expected that all of the allocations will start delivering new development within the short-term time period. Therefore there is concern that the identification of improvements in some of these area would not match up with the timescales form the delivery of growth. It will be important for highway infrastructure improvements to be implemented to help unlock growth on these sites. Therefore it may be necessary for corridor improvements to be made in a shorter timescale to deliver growth in a timely manner. The Outcomes: should include the value of enhancing the environment as an important element in creating urban areas where the opportunity for active travel is maximised. 3) Draft Forest of Dean Connecting Places Strategy No comments This draft strategy acts as guidance for anybody requiring information on the County Council's priorities for transport within Coleford, Cinderford, Lydney, Newent and surrounding areas. The document sets out the aspirations for the Forest of Dean Connecting Paces Strategy area up to 2031. Do you have any comments on the Draft Forest of Dean Connecting

Places Strategy?	
4) Draft North Cotswold Connecting Places Strategy	
This draft strategy acts as guidance for anybody requiring information on the County Council's priorities for transport within Chipping Campden, Moreton-in-the-Marsh, Bourton-on-the-Water and Stowon-the-Wold	No Comments
The document sets out the aspirations for the North Cotswold Connecting Paces Strategy area up to 2031.	
Do you have any comments on the Draft North Cotswold Connecting Places Strategy?	
5) Draft South Cotswold Connecting Places Strategy	
This draft strategy acts as guidance for anybody requiring information on the County Council's priorities for transport within Cirencester, Tetbury, Fairford and Lechlade-on-Thames and surrounding areas.	No Comments
The document sets out the aspirations for the South Cotswold Connecting Paces Strategy area up to 2031.	
Do you have any comments on the Draft South Cotswold Connecting Places Strategy?	
6) Draft Stroud Connecting Places Strategy	
This draft strategy acts as guidance for anybody requiring information on the County Council's priorities for transport within Berkeley, Cam & Dursley, Nailsworth, Sharpness, Stonehouse, Stroud and Wotton-under-Edge and surrounding areas.	No Comments
The document sets out the aspirations for the Stroud Connecting	

Paces Strategy area up to 2031.	
Do you have any comments on the Draft Stroud Connecting Places Strategy?	
7) Draft Tewkesbury Connecting Places Strategy	
This draft strategy acts as guidance for anybody requiring information on the County Council's priorities for transport within Tewkesbury, Ashchurch and Winchcombe and surrounding areas	No Comments
The document sets out the aspirations for the Tewkesbury Connecting Paces Strategy area up to 2031	
Do you have any comments on the Draft Tewkesbury Connecting Places Strategy?	

Policy Documents

8) PD1 - Bus

The Draft Bus Policy Document and sets out the issues, policies and aspirations for bus travel in Gloucestershire up to 2031.

Issues covered by the policy document include:

- Community Transport including voluntary car schemes
- Park and Ride (strategic and local)
- Public Transport Information
- Concessionary Travel and Home to school travel

Do you have any comments on Gloucestershire's Draft Bus Policy Document?

Figure E – Pinch Points and Bus Reliability: Lower High Street
Cheltenham is an area being considered in regeneration initiatives
by the Lower High Street Action Group – which includes
representatives of the West End Partnership, traders, residents,
County Council, Borough Council and Cheltenham Development Task
Force. One of its main problems is connectivity with the remainder
of the town centre. The Borough Council has published a High Street
Analysis document and is working with the West End Partnership
and local residents and businesses on initiatives to improve
economic viability and vitality and environmental sustainability.
Recent grant applications have been made and capital funding is
available. The creation of a one-way out-bound street, with contra-

flow bus lane seems unlikely to contribute towards achieving the regeneration objectives and is not a solution which has been considered by the working group. It would appear to add to the disconnection from the remainder of the town centre. Suggest that "Potential Mitigation" is deleted and replaced with a statement which commits the County to working with stakeholders to address traffic management, environmental and economic viability issues.

PD1.3 Park and Ride Strategic park and ride has potential on selected routes to have an impact on the levels of traffic entering urban areas. Committing to strategic park and ride sites only when they are commercially viable fails to address the potential benefits and fiscal savings in terms of improved health, reduced congestion etc. The introduction of high frequency routes with cycle parking at stops is welcomed but their integration with "local" park and ride using on-street parking in residential areas seems to be doomed to failure. Its impact on residential amenity and on the character of existing and new build housing schemes seems untenable. PD1.3 needs a complete rethink.

PD1.4 Quality bus network Policy is generally supported but note concerns under Figure E regarding proposals for Lower High Street, Cheltenham pinch-point. Additionally need to consider issues of quality, convenience and comfort at bus stops and interchange facilities as well as on buses. Bus stops and interchanges should accommodate modal-shift and incorporate cycle parking (covered where feasible).

PD1.6 Coach Travel: Quality coach travel is important to the economy of the County's towns. It is dependant not only on the frequency of trips, but also on the quality of arrival/departure points. Cheltenham's current provision for coaches is inadequate for

one of the County's major tourist destinations; it has both qualitative and quantitative deficiencies. PD1.6 should address interchange provision and there should be a commitment for the County Council to work with the Borough Council and other partners to address the situation.

Countywide Medium Term priorities (2021 to 2026). Reconsider road-space reallocation proposals for Lower High Street, Cheltenham. Redraft proposal to work with local partners to develop appropriate solutions. Place in Short-term (2015-2021) to meet local work programme and initiatives.

9) PD2 - Cycle

The Draft Cycle Policy Document and sets out the issues, policies and aspirations for cycle use in Gloucestershire up to 2031.

Issues covered by the policy document include:

- Integrating new developments
- Safety, Awareness and Confidence
- Increasing levels of health and wellbeing

Do you have any comments on Gloucestershire's Draft Cycle Policy Document?

Cheltenham Borough Council's Walking and Cycling Overview and Scrutiny Task Group recommended that "The needs of walkers and cyclists should be considered before other road users when making policy and planning decisions". This approach is endorsed in the JCS — which identifies a hierarchy of transport modes which prioritises walking and cycling above other transport modes in decisions about development.

In Cheltenham's flat and compact urban area and in other urban areas of the County, there are real opportunities to prioritise cycling.

The Policy Document on Cycling identifies strong evidence for cycling growth, from a comparatively (for the UK) healthy position in Cheltenham, Gloucester and parts of Tewkesbury. It identifies policies which are broadly supportive of cycling. Nevertheless, it seems to lack the strength of commitment which could see cycling in Gloucestershire's urban areas realise its potential.

It identifies the need for new developments to provide for ease of cycle movement, high level schemes are given the prominence they deserve and there is support for cycle promotion. Nevertheless,

cycling does not establish itself within the LTP as a whole as an important intra-urban mode, which, along with walking, should be the first priority in many urban highway schemes. One example is PD2.5 which encourages developers to include formal and informal play and indicates that streets should be where children feel safe to play, walk and cycle. This is laudable and a valuable policy approach. However, it should apply not only to new streets, but also to existing adopted streets. Experience suggests that the County's procedures do not encourage play on existing streets and that such considerations are not an integral consideration in the design of highway capital or maintenance schemes. Document supported. PD3 - Freight 10) The Draft Freight Policy Document and sets out the issues, policies and aspirations for Freight travel in Gloucestershire up to 2031. Issues covered by the policy document include: Gloucestershire's freight network Driver facilities Rail and water freight Do you have any comments on Gloucestershire's Draft Freight Policy Document? **Road Safety** PD4 - Highways 11) PD 4.6 Road Safety - The road safety section should identify the road The Draft Highway Policy Document sets out the issues, policies and safety benefits of a lower speed environment and introduce aspirations for the highway network in Gloucestershire up to 2031. mention of 20mph zones – discussed elsewhere in the LTP. Issues covered by the policy document include: Additionally PD4.6 should consider the beneficial impact of Network resilience Road safety

- Asset Management
- Enabling development
- Car Parking
- Environment
- Bus Lanes

Do you have any comments on Gloucestershire's Draft Highway Policy Document?

increasing active travel modes (notable walking and cycling) on road safety.

Walking

Pedestrian movement, as noted in 10.1.1 is a universal transport mode; it is an important mode in Cheltenham, where 18% of those in employment travel to work on foot. The CBC Walking and Cycling Overview and Scrutiny Task Group identified that walking is underrepresented in policy considerations. Whilst the inclusion of a specific section on Walking in the Highway Policy Document is welcomed, as the second largest single travel to work mode in Cheltenham, Walking deserves separate consideration through its own policy document.

The Council encourages 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.

10 Pedestrians There is strong evidence that pleasant and convivial streets with a sense of place encourage walking (as well as cycling). This section and PD 4.8 on Pedestrians should recognise this and ensure that policy encourages highway design which creates convivial streets and spaces to encourage walking. To succeed, this approach to street design needs to apply to GCC highway capital and maintenance works as well as development proposals. Similarly, the

final bullet of PD 4.8 implies that children's safety in play, walking and safety is solely a matter for development proposals; it is also a consideration in GCC highway capital and maintenance schemes. The Cheltenham Transport Plan (CTP) is a key element in promoting walking in Cheltenham. It is part of the Cheltenham Development Task Force project and has its origins in the Cheltenham Civic Pride Urban Design Framework, which identifies the inner ring road as a source of "...conflict between vehicles and pedestrian/cycle traffic". The CTP needs to address points of pedestrian (and cycle) vehicle conflict particularly on the inner ring road, and consider how convivial street design can assist. It is noticeable that 10.3.2 includes no scheme for Cheltenham; it should identify Cheltenham Transport Plan as one of the priorities for supporting pedestrians in Gloucestershire PD 4.9 Environment: Should identify active travel (walking and cycling in particular) as modes which benefit the environment and have the ability to reduce negative environmental impacts generated by other modes. 12) PD5 - Rail Document supported. The Draft Rail Policy Document sets out the issues, policies and aspirations for rail in Gloucestershire up to 2031. Issues covered by the policy document include: Rail Infrastructure Improvements **Rail Service Capacity Improvements Rail Station Improvements** Do you have any comments on Gloucestershire's Draft Rail Policy

Document?	
13) PD6 - Thinktravel	
The Draft Thinktravel Policy Document sets out the issues, policies and aspirations for the travel promotion programme in Gloucestershire up to 2031.	Document supported
Under the headings of:	
'Thinktravel' travel promotion	
Managing car use from new developments	
Do you have any comments on Gloucestershire's Draft ThinkTravel Policy Document?	