Cheltenham Borough Council
Cabinet – 3rd March 2020
Gloucestershire Local Transport Plan – draft for consultation

Accountable member	**Cllr McKinlay – Cabinet Member Development & Safety**
Accountable officer	**Tracey Crews - Director of Planning**
Ward(s) affected	**All**
Key/Significant Decision	**Yes**
Executive summary	The Local Transport Plan (LTP) sets the long term strategy for transport delivery within Gloucestershire from 2015 – 2041. The LTP sets out key policies and priority highway schemes that form the basis for decisions on transport investment in the future. This is a review of the LTP adopted June 2016.

The consultation process seeks comment on:
• Shaping the way 2041
• Overarching Strategy
• LTP policies
• Connecting places strategy
• Delivery

The current LTP is not fit for purpose, it is out of step with the statutory development plans across the county; for Cheltenham this includes the Gloucester, Cheltenham and Tewkesbury Joint Core strategy and the Cheltenham Plan. Nor does the current LTP adequately address the climate change agenda and its significant challenges.

In reviewing the LTP draft for consultation due regard has been had to;

• Council and Cabinet decisions in response to declaration of climate change emergency
• Carbon Neutral Cheltenham report
• Connecting Cheltenham – transport strategy
• Gloucester, Cheltenham and Tewkesbury Joint Core Strategy
• Cheltenham Plan
• Draft Local Industrial Strategy
• Gloucestershire Strategic Economic Plan
• Gloucestershire 2050
• Cheltenham Residents Survey

Officers and Members have reviewed the consultation draft document and proposed comments for formal submission are provided at Appendix 2 of this report together with a summary of key priorities sought for Cheltenham provided at Appendix 3. Regard has been had to comments arising from key stakeholders including elected members, transport providers and |

| | businesses arising through a stakeholder engagement session held on 28th January 2020. A summary of points made at this consultation is provided at Appendix 4.

Consultation on the LTP draft for consultation takes place between 16 January 2020 and 26th March 2020. |
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| **Recommendations** | 1. **To agree Cheltenham Borough Council's representations to Gloucestershire's Local Transport Plan (2015 – 2041) draft for consultation (as set out in appendices 2 and appendix 3), and**

2. **Delegate authority to the Director of Planning to formally submit Cheltenham Borough Councils representations no later than 26th March 2020.** |

| **Financial implications** | There are no direct finance implications arising from the content of this report.

Contact officer: Andrew.knott@publicagroup.uk, Tel: 01242 264121 |
|---|---|
| **Legal implications** | Under section 108 of the Transport Act 2000, Gloucestershire County Council, as the Local Transport Authority, has to prepare a Local Transport Plan containing the policies that they have developed for the promotion and encouragement of safe, integrated, efficient and economic transport to, from and within their area and their proposals for the implementation of those policies.

Further, they must carry out their functions so as to implement those policies and in doing so must have regard to the proposals contained in the Local Transport Plan.

In developing those policies and carrying out their functions the local transport authority is under a duty to take into account any policies announced by Government and have regards to any guidance issue in respect of the section with respect to mitigation of, or adaptation to, climate change or otherwise with respect to the protection or improvement of the environment. They must also have regard to the transport needs of disabled persons and of persons who are elderly or have mobility problems.

Local Transport Plans must be kept under review and altered by the local transport authority if they consider it appropriate to do so and in keeping it under review they must consult (as well as other bodies) each of the council of the districts in the County.

Contact officer: *cheryl.lester@tewkesbury.gov.uk, Tel: 01684 272691* |
| **HR implications (including learning and organisational development)** | There are no direct HR implications arising from the content of this report.

Contact: *julie.mccarthy@publicagroup.uk 01242 264355* |

Key risks	The Local Transport Plan is a key strategy for the delivery of essential transport infrastructure to support the delivery of growth identified through the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy and the Cheltenham Plan. It is essential that the Local Transport Plan is updated to contain the infrastructure schemes required to deliver this development. Without the Local Transport Plan Review there is a risk that the delivery of the infrastructure would be delayed or not achieved and therefore risk the delivery of new development.
Corporate and community plan Implications	Appropriate delivery of transport infrastructure needed to support new development within a context of connecting places will contribute to supporting objectives of the corporate plan. Corporate priorities this responds to include; • Continuing the revitalisation and improvement of our vibrant town centre and public spaces • Achieving a cleaner and greener sustainable environment for residents and visitors • Delivering services to meet the needs of our residents and communities. A recent survey of Cheltenham residents commissioned to inform corporate priorities identified transport as a key issue.
Environmental and climate change implications	The draft Local Transport Plan is accompanied by an Integrated Sustainability Appraisal Report and Habitats Regulation Assessment. The draft Local Transport Plan sets out the initiatives, plans and programmes that will contribute to Zero carbon Gloucestershire by 2050. With an emphasis on modal shift, this will contribute locally to carbon emission reductions, although this will probably not align with the Council's aspiration for carbon neutrality for the Cheltenham Borough by 2030.
Property/Asset Implications	There are no direct property implications arising from the content of this report. Property implications may arise should any proposals for delivery impact on any land interests of the Borough Council. The Council will work proactively with Gloucestershire County Council should this arise. *Contact: dominic.stead@cheltenham.gov.uk 01242 264151*

1. Background

1.1 The adopted Local Transport Plan for Gloucestershire (LTP) was adopted in June 2016. The preparation of this plan is a responsibility of Gloucestershire County Council. A partial review of the LTP is now underway; this review shifts the emphasis for transport to respond to the climate change agenda and delivering against the zero carbon Gloucestershire 2050 target.

1.2 In March 2019, Cheltenham Borough Council provided early comments into the review of the LTP. At this time the end date of the review remained at 2031, a point which we challenged as not fit for purpose. It is positive that the LTP now being consulted upon has positively responded to this, extending the end date of the plan to 2041 together with identifying future transport challenges.

1.3 Further comments provided to the early stakeholder engagement, included:

1. The need for the vision to be bold, to reflect the drivers for change as set out in Gloucestershire 2050, Cheltenham Place Vision, Cheltenham transport strategy – Connecting Cheltenham, emerging Local Industrial Strategy and the debates arising from the districts wanting to achieve carbon neutrality by 2030.

2. Overarching strategy - our comments included;

   a. the need for a key driver to be modal shift;

   b. clear articulation of linking transport outcomes to the quality of place, including making efficient use of highway space and links to healthy streets - putting people and their health at the centre of decision making, helping everyone to use cars less and to walk, cycle and use public transport more;

   c. Build the platform for the city region; and

   d. Articulate a clear step change in mass transit.

3. Proposed policy updates – our comments included:

   a. The need to move away from a 'business as usual' approach and to use the redrafting of policies to push the agenda for transport. Appreciating the need to produce an LTP that is practical in delivery, it should also be visionary in terms of expectations and stretching in relation to targets;

   b. Clear policy direction is required, together with being able to read across the policies to reduce the number of car trips. This includes the need to shift to other modes, opportunities of interception of trips via a 'Park and Interchange' strategy, car sharing etc;

   c. A new approach is needed in respect of Park and Ride. Clarity is needed in terms of sites that make up a coherent strategy to facilitate a step change in modal shift. Terminology needs to move from 'Park and Ride' to 'Park and Interchange' with a clear narrative around the inter connection of modes for whole journeys. This includes parking for car sharing at transport nodes, to reduce total vehicle movements;

   d. A clear narrative is needed specifically relating to the A40 corridor and the vision for servicing the demand for travel to work between the 2 major urban centres of Gloucestershire;

   e. The case for rail and investment in infrastructure and demand for speed of service to

London, whilst reflected in part in PD5.2, needs to better articulate the demands arising from the economic growth agenda and Gloucestershire 2050 aspirations.

    f.   LTP needs to be clear on which policies will direct improved management of congestion through network management. Congestion and key pinch points will not go away, so a clear approach to their management is required.

    g.   a clear approach to healthy streets can help guide the approach to future interventions and remodelling of neighbourhoods. There is no reference to healthy streets. In this regard, Cheltenham Borough Council in 2018 submitted evidence to Gloucestershire County Council on the findings of public consultation on 20mph zones. Healthy streets will be a significant contribution to place making and speed limit strategies will be a tool that can aid delivery.

1.4 It is positive to see many of the comments provided at the early stakeholder stage have been proactively responded to by the draft LTP now presented, including;

- response to reducing carbon emissions;

- rail investment to capture the opportunity to increase rail usage;

- move to a proactive modal shift strategy;

- recognition of the value of 20mph zones in transport planning at a neighbourhood level; and

- response to identifying additional park and interchange locations.

1.5 Whilst there is much to support in the LTP and in particular, its context of supporting more responsive and less environmentally damaging modes of transport, in places it feels that the review has been constrained. We remain of the view that the vision, it's supporting overarching strategy and the policies that then flow from this need to be bolder. The LTP review as now presented is built upon a modal shift agenda, but it needs to be up front about this and clearly articulate the vision for delivery. We cannot be apologetic about the negative health and environmental impacts of transport; the time is now to have a mature conversation with stakeholders and the wider community about this agenda.

1.6 As set out in a recent report considered by Cheltenham Borough Council (see detail at paragraph 2.4 below) eliminating emissions from transport is a key challenge to the achievement of carbon neutrality and progress to date in this area has been poor. However, it is positive to see that the LTP draft for consultation includes some of the elements in the report, including transport hubs, zero emission last mile deliveries, EV charging infrastructure, infrastructure for walking and cycling.

1.7 By being upfront about the modal shift agenda in the vision, we are making a statement for Gloucestershire that recognises that congested streets make our places more unpleasant, exacerbate pollution, add delays to journeys made by public transport modes, reduce the efficiency of commercial journeys and have a huge negative impact on the health outcomes of the county. Today's children comprise the first generation that is expected to live more of their lives in ill health from chronic disease than their parents. The LTP review references the patterns of journey behaviours of this demographic and as such, the vision should recognise the future generational impact it is planning for.

1.8 The county, through Leadership Gloucestershire, is working on the proposal and governance arrangements for the City Region. The LTP review has the opportunity to provide a solid platform across which to support the opportunities for economic prosperity through the connection of Cheltenham and Gloucester via effective and efficient transport connections. The LTP needs to

clearly articulate the City Region concept.

1.9   The contribution of transport in helping to define places is not clearly articulated. As noted in the Carbon Neutral Cheltenham report, "The inevitable transport redesign that new shared and connected business models will bring will also give Cheltenham the opportunity to rethink public spaces… A closer alignment between public and shared transport modes, along with the new infrastructure, will mean that Cheltenham will be able to reclaim cultural spaces, increasing the amount of walking in the town centre, which will have positive effects on the local economy as well as health benefits."

1.10   In places, the LTP review is unwieldly and further work would be welcomed to reduce repetition, provide clarity on what the essential issues and strategies for delivery are and to refine the criteria set out within each policy. Policies need to be easy to interpret and provide clarity of message to aid engagement across a broad range of stakeholders, including developers, transport operators, businesses and local communities.

1.11   Policies need to be positively worded and further review would be welcome to help achieve this.

2.   Reasons for recommendations

2.1   Over 2018, the borough council engaged with key stakeholders, including Gloucestershire County Council, on a transport strategy for Cheltenham – Connecting Cheltenham. Transport consultants Systra were commissioned to deliver this strategy. There was consensus through the engagement with elected members and stakeholders that we need to push the agenda for transport. Cheltenham's Cabinet considered this strategy at its meeting on 8th October 2019 and resolved that:

1.   Connecting Cheltenham be approved as the transport strategy for Cheltenham;

2.   The strategy to be used as the basis for the council's input into the review of the Gloucestershire Local Transport Plan;

3.   The strategy be used in future negotiations across the borough associated with new development through the Section 106 process and to inform future Community Infrastructure Levy allocations;

4.   Support to be sought from Tewkesbury Borough Council to use the strategy in regard to new development outside the borough boundary through the Section 106 process and to inform future Community Infrastructure Levy allocations.

5.   Authority be delegated to the Director of Planning, in consultation with the Executive Director Finance and Assets and Cabinet Member Development and Safety, to prepare a programme for delivery which identifies short, medium and longer term priorities and the approach to funding; this programme for delivery to be brought back to Cabinet for consideration;

6.   The strategy to be used as the basis for the council to seek funding for its delivery plan.

The Cabinet report can be viewed via the following link
https://democracy.cheltenham.gov.uk/documents/s30824/2019_10_08_CAB_Connecting%20Cheltenham_report.pdf

The Connecting Cheltenham transport strategy can be viewed via the following link
https://democracy.cheltenham.gov.uk/documents/s30732/2019_10_08_Connecting%20Cheltenham_appendix%202_strategy%20report%20and%20executive%20summary%20LOW%20RES.pdf

2.2   At a meeting of Cheltenham Council on 18th February, 2019, there was a unanimous Council

motion, which called on the Cabinet to declare a climate emergency. Subsequently, at a meeting of Cabinet on 9th July 2019 a climate emergency was declared. In debating the Council resolution the following points were resolved;

- To make Cheltenham carbon neutral by 2030

- To call on Westminster to provide the powers and resources to make achieving this target possible and to work with other governments (both within the UK and internationally) to determine and implement best practice methods to limit Global Warming to less than 1.5°C

- To continue to work with partners across the town, county and region to deliver this new goal through all relevant strategies and plans

- To report to full Council with the actions the authority will take to address this emergency

2.3   The 9th July Cabinet report can be viewed via the following link https://democracy.cheltenham.gov.uk/documents/s29064/2019_07_09_Climate_emergency_cabinet_report_V4.pdf. This initiative is aligned to the Council's current Corporate Strategy under the 'Achieving a cleaner and greener sustainable environment for residents and visitors' priority - https://www.cheltenham.gov.uk/info/19/corporate_priorities_and_performance/790/our_corporate_strategy

2.4   At a meeting of Cheltenham Council on 14th October, 2019, a 'Carbon Neutral Cheltenham' report and 2030 road map was considered. Council resolved unanimously that:

Council endorses the findings of the 'Carbon Neutral Cheltenham – Leadership through Stewardship' report and its associated roadmap and recommends that Cabinet:

- Writes to the relevant Secretary of State, setting out the Council's climate concerns, ambition and roadmap to take action, formally requesting Government to provide the planning powers, guidance and resources to local government to make the 2030 target feasible;

- Subject to available resources, considers setting a challenging interim community-wide target for achieving a reduction in borough-wide carbon emissions by 2025, to provide a clear signal of the scale of the local ambition to take effective action;

- Considers, prioritises and identifies the resources needed to deliver the actions required to meet the 2030 carbon neutrality targets;

- Develops an annual reporting process to effectively track progress;

- Delegates authority to the Executive Director People & Change and the Director of Environment, to develop the roadmap into a realistic action plan for project delivery, with appropriate business case development taking account of the impact on the Council's financial position.

A copy of the Council report can be viewed here https://democracy.cheltenham.gov.uk/documents/s30895/2019_10_14_Council_Responding_to_Climate_Emergency%20-%20Final.pdf

A copy of 'Carbon Neutral Cheltenham' report can be viewed here https://democracy.cheltenham.gov.uk/documents/s30896/2019_10_14_Carbon%20Neutral%20Cheltenham%20Report.pdf

2.5   It is important that Cheltenham gives careful consideration to proposed changes set out within the

LTP draft consultation document, as once approved, the LTP will set strategic transport policy for the county, make commitments to highway schemes and guide future funding decisions. Given the agenda set by the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy together with the Cheltenham Plan and wider contexts set by the Gloucestershire Strategic Economic Plan and emerging Local Industrial Strategy, together with Cheltenham's response and actions to the declaration of a climate emergency, it is essential that these are reflected in the LTP to ensure future delivery of transport infrastructure and behavioural change within the context of a modal shift agenda that responds effectively to the carbon neutral challenge.

3.   Alternative options considered

3.1   The purpose of the LTP consultation is to gain feedback on the policies and strategies proposed and this may help to inform an alternative strategy.

4.   How this initiative contributes to the corporate plan

4.1   Transport is a key outcome of the Corporate Plan and the Cheltenham Place Vision.

5.   Consultation and feedback

5.1   Gloucestershire County Council engaged with stakeholders during spring 2019 to help inform the LTP draft now available for consultation. Officers engaged informally with members to inform the preparation of an officer response and with key stakeholders, including the Cheltenham Chamber of Commerce and Cheltenham Development Taskforce. This response was submitted to the LTP review team in March 2019.

5.2   Consultation with the LTP review team took place at Cheltenham Borough Council offices on Tuesday 28th January, 2020. This consultation was in 2 parts, firstly a daytime surgery open to all stakeholders and members of the public and secondly, a presentation with Q&A with elected members and stakeholders. Invitations to this latter consultation activity were shared with transport providers, businesses and statutory consultees and interested parties. Key issues arising from this session have been incorporated into the response and a note of the points raised provided at appendix 4. Key points raised included;

- Need to be in step with 2030 climate change target

- Needs to clearly set out what will be measured and how.

- Clarity needed on funding and over what period

- Modal shift requires significant behavioural change – needs political will

- More serious intent on public transport solutions

- Need to be bold

5.3   In March 2019, Cheltenham Borough Council commissioned consultants BMG to undertake a survey to understand resident's perceptions and experiences of living in Cheltenham, and in understanding how the Council can best implement its corporate strategy. Almost half of residents believe either reducing traffic in general (25%), or improving traffic management (20%), will make the greatest difference to air quality. There was also support for improved public transport and greener ways of getting around. Just under a third of residents believe that promoting walking, cycling and public transport should be one of the Council's top three priorities (29%) and 12% of residents believe the priority for the town centre should be making it easier to walk and cycle there.

5.4 From the survey more than four in five Cheltenham residents agree that the Council should play a role in tackling air quality issues (83%), enabling people to walk/ cycle more (82%) and enabling public transport use (81%). Three quarters (75%) of residents agree that Cheltenham Borough Council should try to reduce vehicle emissions in the borough. Given that more than three quarters of vehicle users (77%) support environmental action, it is clearly not the case that high frequency vehicle users oppose the promotion of alternative transportation. The Cabinet paper that considered the report can be viewed via the following link https://democracy.cheltenham.gov.uk/documents/s31473/2019_12_17_CAB_Residents_Survey.pdf .

The full survey findings can be viewed via the following link https://democracy.cheltenham.gov.uk/documents/s31458/2019_12_17_CAB_Resident_Survey_2019.pdf

6.   Performance management – monitoring and review

6.1 The Planning Policy and Townscape teams will follow the progress of the review of the LTP closely and report back to Cabinet on any issues which it is considered may impact upon the Borough and its residents.

Report author	Contact officer: Director of Planning tracey.crews@cheltenham.gov.uk
Appendices	1. Risk Assessment 2. Cheltenham Borough Council - comments to Local Transport Plan draft for consultation 3. 1 page summary of Cheltenham key asks and priorities sought from LTP 4. Notes of comments arising from GCC consultation with CBC and stakeholders Tuesday 28th January, 2020
Background information	1. Local Transport Plan draft for consultation https://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/ltp-review-201920/

Risk Assessment

The risk				Original risk score (impact x likelihood)			Managing risk				
Risk ref.	Risk description	Risk Owner	Date raised	Impact 1-5	Likeli-hood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
	If the LTP is not updated effectively there is a risk that the delivery of infrastructure will be delayed or not achieved and therefore jeopardise the approval and delivery of new development.	Tracey Crews	25.3.15	4	2	8	Reduce	Planning Policy Team to continue to review changes arising and report back to Cabinet as appropriate.	As required	David Oakhill	Planning
62	If the LTP is not updated effectively there is a risk that local pollution levels may rise with poor air quality affecting a wider area, with damaging health and reputational impacts for the town, which could also trigger formal action by DEFRA against the authority	Cabinet	21.01.20	5	5	25	Reduce	Ensure that the new LTP takes appropriate account of current air quality challenges across Gloucestershire and that the strategy is sufficiently ambitious to address existing traffic pollution issues		Mike Redman	Yes – Corporate risk register
	If key strategic plans and projects fail to take sufficient account of their climate change impacts, there is a significant risk that public authorities will	Cabinet	11.02.20	5	4	20	Reduce	Lobby GCC to ensure that the new LTP takes appropriate account of transport related carbon emissions across	Spring 2020	Darren Knight	New corporate risk

be unable to meet their commitments to reduce carbon emissions, with significant reputational consequences							Gloucestershire and that the strategy is sufficiently ambitious to address existing traffic pollution issues which currently constitute around a third of all such emissions			
If the LTP does not respond to the more ambitious timescale set by the council (and other districts) for achieving a net zero carbon borough by 2030 then the council's ability to achieve its target could be significantly compromised	Cabinet	13.02.20	5	4	20	Reduce	Continued engagement with GCC on delivery of transport projects that prioritise carbon reduction	Ongoing	Tracey Crews	New corporate risk

Explanatory notes

Impact – an assessment of the impact if the risk occurs on a scale of 1-5 (1 being least impact and 5 being major or critical)

Likelihood – how likely is it that the risk will occur on a scale of 1-6

(1 being almost impossible, 2 is very low, 3 is low, 4 significant, 5 high and 6 a very high probability)

Control - Either: Reduce / Accept / Transfer to 3rd party / Close

Cheltenham Borough Council – Schedule of comments to Local Transport Plan draft for consultation   Appendix 2

For a summary of the key asks and priorities arising from this schedule, see Appendix 3.

Section /policy/para	Comment
General comments	
General	The LTP is a substantial document, there is repetition across a number of the chapters, but this has resulted in the production of a long document where it is not always clear what the essential issues and strategies for delivery are. Whilst the background is helpful, this would be better placed in an appendix to enable the LTP to be shorter and more focussed. Document needs structure, confusion between analytical data and policies. It needs to tell us: • The baseline - what we need to know – this is how we currently get around the county and these are the actions • The actions that will deliver the change needed, and • Clear delivery plan We want to go down a modal shift challenge, but we have 2 historic scheme that need to be resolved (1) M5 junction 10 and A417 missing link. These open up the county, but also set the infrastructure for then more proactively responding to the modal shift agenda. A number of policies seem to be very unwieldly, due to the number of separate points within each policy. This should be reviewed. Policies need to be easy to interpret and provide clarity of message to aid engagement across a broad range of stakeholders including developers, transport operators, businesses and local communities. The LTP is now at 435 pages. It's a mix of analysis, wish lists, download of information, policies – it is not a useable LTP. It needs to be focussed with clear baseline, ambitious vision, strategy, policy and clear delivery. A good comparator is the 2050 vision that was clear and concise, but was supported by the depth of supporting documentation for those interested in the technical analysis. In a number of areas policies could be worded more positively The LTP makes reference to important documents like the Local Industrial Strategy, Strategic Economic Plan, climate change etc, but what it fails to do is then clearly articulate how the LTP will influence and deliver against the key outcomes. The approach to an LTP based upon a road hierarchy needs to move to a mode hierarchy as set out in Connecting Cheltenham strategy with the focus on moving goods, people and services within a climate change backdrop. The document feels as if written by a highways authority not a transport authority, as such the priority remains focussed on roads. There needs to be a step change in approach e.g. delivery strategy Table 4 – county wide scheme delivery plan, this has no mention of rail investment.

	Appreciating that the LTP is having a light touch review, but as drafted it is too much business as usual and fails to adequately respond to the very challenging environment we are now planning in the context of and in recognition of the needs clearly stated by the young people of the county. https://www.gfirstlep.com/downloads/2019/gfirst-lep-youth-survey-2019v2.pdf Section 2.8 refers to changes in attitude and consumer behaviour. Needs to make reference to GFirst LIS data from youngsters where they saw public transport as a key barrier for the County. Surely this should lead with the commitment of GCC and the districts to climate change and the critical role of transport in tackling that challenge. This would allow the whole thrust of the document to be on mode shift, zero emission last mile deliveries etc. Cover page gives the impression it is out of date – should clarify that this is a 2020 review of the 2015-2041 policy. Page ii (and subsequent similar pages, which often have nothing to do with rail) – why does the statement refer only to rail?
Foreword	
Foreword	Support for extending date of review to 2041.
Foreword	It would be helpful here to reference city region.
Foreword	Welcome context of LTP responding to more responsive and less environmentally damaging modes of transport, but this needs to be bolder. The LTP is built upon a modal shift agenda. The LTP needs to be upfront about this and clearly articulate the vision for delivery. We cannot be apologetic for the impacts of transport, but have a mature conversation with those stakeholders and the wider community on this agenda. A key issue is urgency – we need to be taking actions now such that by 2041 x,y and z will have changed – it reads like we have time.
Shaping the way to 2041	
Whole section	A lot of words in here which set the scene, but it is lacking punch. More emphasis needs to be given on clearly articulating the vision for transport. The LTP needs to be robust in putting people and their health at the centre of decision making, helping everyone to use cars less and to walk, cycle and use public transport more. If the strategy is changed from that based on a road hierarchy to one based on a mode hierarchy, this would go a significant way to resetting the baseline for decision making and the policies that flow from the LTP. At the heart of the vision should be the ambition to create places for people. By being upfront about the modal shift agenda in the vision, we are making a statement for Gloucestershire that recognises that congested streets (and roads outside of town centres) make our places more unpleasant places to be, causes pollution, adds delay to journeys made by public transport, reduces the efficiency in commercial journeys and has huge impacts on the health outcomes of the county. A recent Cheltenham survey of residents commissioned by the borough council identified the following points; - Almost half of residents believe either reducing traffic in general (25%) or improving traffic management (20%) will make the greatest difference to air quality. - There was also support for improved public transport and greener ways of getting around. Just under a third of residents believe promoting walking, cycling and public transport should be one of the Council's top three priorities (29%) and 12% of residents believe the priority for the town centre should be making it easier to walk and cycle there.

- More than four in five Cheltenham residents agree that the Council should play a role in tackling air quality issues (83%), enabling people to walk/ cycle more (82%) and enabling public transport use (81%).
- Three quarters (75%) of residents agree that Cheltenham Borough Council should try to reduce vehicle emissions in the borough. Given that more than three quarters of vehicle users (77%) support environmental action, it is clearly not the case that high frequency vehicle users oppose promotion of alternative transportation.

The Cabinet report 17 December 2019, together with the full survey report can be accessed via the following links
https://democracy.cheltenham.gov.uk/documents/s31473/2019_12_17_CAB_Residents_Survey.pdf
https://democracy.cheltenham.gov.uk/documents/s31458/2019_12_17_CAB_Resident_Survey_2019.pdf

Over 2019 Cheltenham Council/Cabinet has responded to the declaration of a climate change emergency, including the publication of 'Carbon Neutral Cheltenham' report which can be viewed via the following link
https://democracy.cheltenham.gov.uk/documents/s30896/2019_10_14_Carbon%20Neutral%20Cheltenham%20Report.pdf Eliminating emissions from transport is a key challenge to carbon Neutrality. It is positive to see that the LTP draft for consultation includes some of the elements of this report, including transport hubs, zero emission last mile deliveries, EV charging infrastructure, infrastructure for walking and cycling, but this section could be bolder about the role the LTP will play in delivering real change.

Today's children are the first generation that is expected to live more of their lives in ill health from chronic disease than their parents. The LTP references the patterns of journey behaviours of this demographic and as such the vision should recognise the future generations it is planning for.

May be helpful to reference the Industrial Strategy White Paper 5 foundations to drive productivity as these have a direct relevance to transport, these being;
- Place
- Ideas and Innovation
- People
- Business environment

Missing from this section overall is the context of place shaping and how through transport interventions, behavioural change, access to big data, digital connectivity etc, the LTP can have a positive impact on place making outcomes across the county.

This section needs to clearly articulate the key outcomes that the LTP will be tackling, setting the scene for the overarching strategy. Suggest review of the vision set out in the Mayors Transport Strategy for London (2018) that sets a clear narrative for reducing dependency on the private car.

Headings should be more explicit about the environmental & health drivers – does their inclusion in the 'changes in attitude' sections

	give them sufficiently high profile?
1.1	Support for extending date of review to 2041.
2.1	Paragraph 1.1 talks about the need for an ambitious strategy, but this is not followed through in the vision. The dictionary definition of vision is "the ability to think about or plan the future with imagination". As CBC stated in our early comments on the emerging LTP, the vision needs to be bold and needs to clearly articulate the direction of travel for the strategy as a whole. As drafted the vision does not reflect the spirit of Gloucestershire 2050, emerging Local Industrial strategy or Cheltenham Place vision. Vision references 'door to door' transport, surely we are not predicating the vision on travel by the private car? The vision needs to clearly set out the commitment to a shift towards sustainable transport modes and a reduction in the use of private vehicles. Clear statement needed on strategy for modal shift. Vision is slightly different from that on the front page – why? 'door to door' has been removed. Is sufficient consideration being given to managing demand for transport?
2.3	This is the place to be upfront about the strategy for modal shift. As drafted it is lost.
2.5	Seeming confusion re population growth – is it 'low' as in this para or 'unprecedented' as in the 'Foreword'?
2.8	Reference the actual contribution of transport to greenhouse gas emissions
2.9	The 3% reduction in young licence holders is at variance with this data https://www.telegraph.co.uk/news/2017/07/10/record-decline-teenagers-learning-drive-figures-show/
2.11	The link between 'innovation' and transport needs to be clear. As drafted it is forced – be better to make direct links with LIS and need for effective sustainable transport underpinning the plan
3.8	What's the 'total transport' project? Can't find references on the GCC website or in the delivery plan.
3.12	Think the quoted Street Manager implementation date is out of date, looks like footnote 15 is also out of date
3.19	Good point – how will this happen?
4.4	Are there any stats on current and future targets for mode shift. It talks about 'significant' mode shift but no explanation.
4.5	Specific actions are not included in the delivery plan. The key missing is leadership. It notes the importance of partners but as witnessed with CTP phase 4 – district and bus partner / stakeholders on board and evidence provided but modal shift benefits potentially lost
5.4	Reference to the three boards but these do not have private representation whereas the LTP claims that this is key in 4.5. Mixed messages – either the approach is inclusive of private partners or it's not.
5.10	Positive reference to cyber but the importance of garden communities principles missed; re: walking, cycling etc
5.12	Opportunity to reinforce mass transport and low carbon solutions alongside road schemes
5.15	Reference to mass public transport but feasibility doesn't appear as a specific county wide priority in table 4 Delivery Plan

5.16	Focus on bus priority measures but in Cheltenham Arle Court bus priority and CTP phase 4 which delivered demonstrable bus benefits abandoned – so difficult to evidence commitment
5.17	Ambition for community transport provided by charity and voluntary sector. How will this emerge without early support / funding?
5.18	Looking to deliver strategic cycle desire lines is admirable but does it match the figure A map, e.g. the route between Cheltenham and Gloucester and Cheltenham – Bishops Cleeve appear to be 'off-line' solutions whereas previous feasibility has looked at a route parallel to A435
5.24	Words missing at top of page 21
Page 25 – 30	Paragraph numbering goes awry
6.0	This section offers the opportunity to clearly articulate the longer term ambitions for Gloucestershire, painting the vision for connected Gloucestershire built upon the foundations of a modal shift strategy to deliver real change. As drafted the list of potential schemes are helpful, but do not spell out what the collective vision is through the implementation of these schemes.

The long term ambition focuses on a host of very positive non-road strategies; surely these have to be re-prioritised so that they become the short term targets viz walking, cycling, bus transport. This should be a key focus of the delivery plan. |
| Table 1 | Scheme interventions set out here are supported, not clear whether there is any prioritisation across the schemes.. how will schemes be delivered? |
| **Overarching Strategy** | |
| General | Is it a strategy or an analysis?
Given the data provided it appears to be an overview or assessment of current situation |
Figure A	Not clear what is meant by council strategy in this diagram. Is this referring just to GCC council strategy, if so, what strategy, or council strategies across the districts and county?
Figure B	Very difficult to navigate the policy documents despite figure B. How do PDs 0.n fit in?
Table A	spectrum ignores rail
Figure D	Graph doesn't seem to match figures in 2.4
Figure E (graph)	LGV increase appears alarming – needs comment (and action) Probably internet shopping delivery vans hence need for last mile zero emission models, so opportunity for LTP to think about supporting a radical solution in the urban areas for last mile deliveries.
1.5	See previous comments on vision.
1.6	Opportunity here to provide a clear and upfront statement on modal shift. Clear focus is needed on increasing modal share allocated to walking, cycling, public transport and the connections between these modes. This can then flow through to each of the sub sections across the LTP. mass
2.7 / Fig E	Worrying data here for Gloucestershire against the national average. With recorded dip in public transport, which records flows at the lowest levels since 2000, this sets the context for response of LTP to be focussed on modal shift. Is there a breakdown of this table for the urban areas as the wider rural context may be skewing the overall picture?

Equally CTP phase 4 recorded a 4.3% growth in bus patronage against a national decline of 2% but scheme not supported. So what is |

	the ambition?
2.10	Linked to number of short trips, would be worth highlighting here the propensity to cycle figures for the main urban areas of Cheltenham and Gloucester. This paragraph should make the connection to the city region and the TTW area linked to that, paving the way for the subsequent sections and interventions to deliver a step change in travel modes and behaviours.
2.11	Transport greenhouse gas emissions – 27% or 44.6%? Also subsequent split by mode and the Fig I graph are confusing, presumably these are percentages of the 27%?
2.13	Useful to point out that the high car travel to work percentage (is it high in comparison to other areas) provides an opportunity (as well as a challenge!)
2.16	What are the proposed targets for these sustainable modes? This is the first mention of behavioural change, this need to be one of the key drivers for the strategy.
3.1.5	The LTP target for the county is 2050 (as per 3.1.7), but recognition also needs to be made of district targets set at 2030.
3.1.9	What do the possible interventions to contribute to carbon neutrality look like? How far will the LTP take us on that journey? What else is required? There is an opportunity in this section to start setting out some of the longer terms 'asks' that will inform future pathways.
3.1.13	This section should be more explicit around planning in the context of the understanding of TTW areas and identifying growth areas that respond to that context.
3.1.18	Low emission zones flagged but are not included in policies or delivery plan.
Policy LTP PD0.1 Reducing transport carbon emissions and adapting to climate change	How will this policy be measured? What does success look like?
Policy LTP PD0.2 Local Environmental Protection	Suggest this may be the time to introduce Boots corner, severance, place making etc….. This policy should make reference to 'Building with Nature'. Supporting text should outline how this can be taken into account. A policy with 27 requirements seems unwieldy, look at opportunities to refine
3.3.2	This section fails to make reference to the wider place making context and the environmental/townscape benefits that can arise from this. Third bullet point should include 'inclusive'.
4.1.3	This needs to clearly articulate the city region, the opportunities for economic prosperity in the context of the M5 corridor.

	Reference here that GCC is now entered a partnership agreement with the JCS councils and will work collaboratively on delivery of the JCS and its review.
Figure M	Could this map define the city region boundary, TTW areas would be the obvious definition against which to capture this.
4.1.9	LTP targets - where are these set out?
4.1.13	'The encouragement of active travel', shouldn't the LTP be more directional than this?
4.1.14	How are ideas of 'invisible infrastructure' reflected in policy and delivery plans and applied to existing? LTP PD 0.4 seems to deal with new developments.
Policy LTP PD0.3 Maximising investment in sustainable transport network	5th bullet point, remove the wording 'where possible'. 7th bullet point – this must have regard to wider place shaping outcomes and heritage considerations
Policy LTP PD0.4 Integration with land use planning and new development	Opportunity via the policy to embed the work of the LEP construction and infrastructure group 'Removing Barriers to development' 2nd bullet point – suggest more positive working would be to promote rather than support 6th bullet point – this would be an opportunity to link in PPA's 21st bullet point - make reference to 'Building with Nature'. Supporting text should outline how this can be taken into account. A policy with 22 requirements seems unwieldy, look at opportunities to refine
4.3.20(b)	2nd bullet point - Do we want to reference Boots Corner here? 4th bullet point – not just about existing public transport, maximising existing and expanding network so that public transport becomes a mode of choice 7th bullet point – where is the ambition in this statement, surely we are aiming for better than 'fit for purpose'. Both the main urban areas have a high propensity to cycle due to their geography and topography this provides the LTP with an advantage and opportunity to provide interventions that can deliver both best practice nationally and drive towards being exemplar in cycling infrastructure.
Policy LTP PD0.5	CBC in 2018 submitted consultation findings on a 20's plenty survey across the borough. This evidence clearly showed the appetite to implement 20's plenty and this has been included within the agreed Transport strategy for Cheltenham 'Connecting Cheltenham' with an ambition to deliver a speed strategy across the borough. We request that this is incorporated into this policy. 17th bullet point - make reference to 'Building with Nature'. Supporting text should outline how this can be taken into account.

	A policy with 18 requirements seems unwieldy, look at opportunities to refine
5.0	Section generally needs a quality check to remove cosmetic errors.
6.0	Thinktravel – what resources, what specific deliveries, is it more than a portal?
PD1 Public & Community transport	
Policy LTP PD1.1	Bus reliability is noted in the supporting section to this policy, this policy therefore needs to be clear on the interventions that will bring the biggest gains. This policy should reference implementation of A40 bus lane or link to the delivery strategy where this intervention should be explicit. The transport strategy for Cheltenham 'Connecting Cheltenham' has a clear recommendation for park and interchange, this should be referenced clearly within this policy. Given the context of Cheltenham as The Festival Town, public transport does not appropriately support the extension of events into the evening or the transition between the daytime and night time economy. This policy would be an appropriate place with which to recognise the economic value of providing services that support this. The evidence quoted in section 2.0 omits the impressive modal shift and performance improvements achieved through CTP phase 4 where growth of 4.3% against a national decline of 2% was achieved.- Stagecoach data made public. The challenge is that this demonstrable modal shift was not supported and as a consequence the major operator less likely to support other schemes
3.3.2	1st bullet point – support A40 bus corridor improvements, but this should be explicit in referencing the delivery of A40 bus lane.
Policy LTP PD 1.3	Bus Priority was trialled successfully as part of CTP phase 4 but not made permanent. It secured full support from Stagecoach as main operator as not only had it improved modal shift but also reliability. Difficult to understand what further evidence for bus priority schemes is required.
Table C	Not at all clear what this means, is it a standard or a segmentation?
4.1.3	99% of buses have contactless, 10% don't? check the statement and amend.
8.1.4	Identified hubs are nowhere near train stations. What are the criteria influencing their siting?
PD2 Cycle	
1.0	This section misses the opportunity to set a clear and ambitious vision for cycling. The ambition needs to be more than "to create better cycling opportunities". There is an opportunity in a number of localities across Gloucestershire to set ambitious targets for modal shift to cycling. The agreed transport strategy for Cheltenham 'Conencting Cheltenham' sets a clear ambition for the delivery of CheltWays. This provides a best practice starting point that the LTP could deliver against.
Policy LTP PD 2.1 Gloucestershire's cycle network	3rd bullet point – this policy needs to be more ambitious than improving cycle links. To deliver change both strategic and local cycle networks need to be identified, designed and implemented. Simply working with what we have will not address the issues of the need to quality infrastructure and the connectivity of that infrastructure.
Policy LTP PD 2.3. Active Travel; safety,	See pervious comments made to Policy LTP PD0.5. through the introduction of a speed strategy within the main urban areas all road users will benefit, both in terms of opportunities to drive modal shift, improve safety and confidence of pedestrians and cyclists, creating places for people that reads to the wider place making agenda.

awareness and confidence	
PD3 Freight	
2.1	White van expansion. The CTP phase 4 trial closure to through traffic created no concerns from delivery firms who merely re-routed or delivered within the non-exempt times; demonstrating that behavioural change can be achieved. Like with all change there were challenges in the early period of implementation, but these bottomed out through the course of the trial. This section should reference the 'last mile', the opportunity for the LTP to act as an influencer in last mile logistics. This ranges from shared vehicles, smart technology, autonomous vehicles, drones and robots. Gloucestershire has an opportunity to recognise the importance of business to business delivery and set a clear ambition to respond to the evidence base and options for intervention. Note this is referenced in paragraph 7.1.10 and policy LTP PD3.5, but this should be more prominent with clarity on the ambition to make real change. With the compact nature of the main urban areas of Gloucestershire, the county is well placed to develop best practice and test innovative solutions.
Policy LTP PD 3.1 Gloucestershire's Freight network	Reference should be made to policy LTP PD3.5 in respect of last mile deliveries.
PD4 Highways	
Policy LTP PD 4.3 Highways maintenance	Communication in regards to highways maintenance has not always been effective with the districts, who given their engagement within their local communities are often best placed to provide advice on prioritisation of works. Add in a bullet point that makes this communication a requirement within the policy. Street trees are an important feature within the street scene across Gloucestershire; these should be recognised in terms of maintenance and replacement in the context of highways maintenance.
Policy LTP PD 4.4	See previous comments made to Policy LTP PD0.5. through the introduction of a speed strategy within the main urban areas all road users will benefit, both in terms of opportunities to drive modal shift, improve safety and confidence of pedestrians and cyclists, creating places for people that reads to the wider place making agenda.
6.1.2	CBC also has EV charge points in its car parks and is currently undertaking a review to determine future provision.
PD5 Rail	
1.0	Welcome focus in the LTP on capturing the opportunity to increase rail usage
1.1.6	Where's figure B? Should it be fig A?
PD6 Walk	
1.0	This chapter should emphasise the importance of place shaping in the provision of infrastructure for walking. The importance of 'meanwhile spaces' in the provision of infrastructure for walking should be recognised in this chapter. By creating

| | attractive, shaded places to sit/rest along a journey will improve the opportunity for those with less mobility to incorporate walking into their transport patterns. It also responds to the extremes in weather providing places to stop for shade is extreme heat or offer shelter from the rain/snow. Placement of street trees are a positive contribution and future planting should have regard to developing a network of meanwhile spaces with the supporting infrastructure of seating.

See pervious comments made to Policy LTP PD0.5. through the introduction of a speed strategy within the main urban areas all road users will benefit, both in terms of opportunities to drive modal shift, improve safety and confidence of pedestrians and cyclists, creating places for people that reads to the wider place making agenda. |
|---|---|
| Policy LTP PD 6.1 Gloucestershire's pedestrian network | CTP phase 4 trial demonstrated improved footfall both through Boots Corner itself but also within the town centre. The Cheltenham BID reported a 7% increase in footfall towards the end of the trial demonstrating the impact of prioritising pedestrians over vehicles; an impressive outcome given the challenging retail environment. The importance of footfall to wider town centre performance needs strengthening |
| **Connecting Places Strategy** | |
| 3.0 | Given the importance of the two urban areas of Cheltenham and Gloucester to the economic outcomes for Gloucestershire, acting as the engine room for this part of the south west region, there is an opportunity here to set a clear and ambitious vision for transport. This section as drafted relies heavily on work already in train and 'seeking improvements'. The LTP should set a vision that is bold and visionary to address head on the challenges across the CSV. |
| 3.1.14 | This paragraph should reference the ambition to deliver a strategic cycle network 'CheltWays' as set out in Cheltenham transport strategy 'Connecting Cheltenham' |
| 3.2.4 | Do we want to reference Boots Corner here? |
| 3.2.5 | Commitment should be made here to implementation of A40 bus lane and cross reference to longer term ambition of mass transit between Cheltenham and Gloucester |
| 3.2.10 | Should read 45ha of employment.
Please use terminology Cyber Central Garden Community not business park |
| **Delivery** | |
| | This section as drafted is opaque. It doesn't reflect the overarching strategy of prioritisation of walking, cycling and public transport. As stated earlier in our comments the LTP should reflect a mode hierarchy not a road hierarchy and this should flow through into the delivery section.

Indicators have not been pulled through from the main body of the document, so how does this section demonstrate effective delivery.

Not clear which schemes are funded (see fig A, comments in 4.9 and tables). Noticeable that 'Highways' mode schemes seem clearer in their funding sources than other modes, reference our previous comment that LTP should have a mode hierarchy not a road hierarchy. Which schemes are being funded through the GCC Capital programme? As currently drafted the delivery section is not realistic, it feels that delivery is predicated on the' hope' of schemes being delivered e.g. community transport. |

	LTP recognises the big challenge of freight and mass movement of people, so why is delivery section not making the best bang for the buck focussed on these? Rapid transit appears 5 times/mass transit appears 16 times across the LTP, but why isn't the delivery section leading with this? Countywide schemes are all about roads, rail investment strategy not referenced, mass transit not referenced
	No target dates.
	There are 5 tests of delivery of a scheme set out in this section. None of these tests include assessment against climate change. One of the test is public acceptability, but we need to recognise that change isn't comfortable and behavioural change requires leadership.
	Monitoring Indicators – what's the baseline / how are they measured / what's the performance to date (from 2015)? Monitoring outcomes need to be linked to the vision.
1.7	In delivering the LTP at an officer level, it would seem appropriate to have officer representation from District/Borough/City on the LTP Management Board. It is likely that the delivery of new planning policy and new development will impact on and fund the delivery of the LTP.
Table 1, 2 and 3	Heavy focus on Highways improvements Some of the proposed cycle improvements (for eg Chalford to Cirencester cycle improvements) need to have clearly defined purpose and desired outcome

Summary of Priorities – Cheltenham Borough Council   **Appendix 3**

This summary is a synthesis of the more detailed schedule of comments from CBC to the LTP consultation and reflects the positive stakeholder engagement generated through the Systra 'Connecting Cheltenham' commission and reflects the GCC engagement session with elected members and stakeholders. Key points are as follows:-

- Whilst the dramatic tonal change towards sustainable solutions is welcomed, as is the emergence of a rail strategy, there is significant concern that this has not translated into the 'delivery section', where CBC hoped to see many more of the Connecting Cheltenham ambitions. The LTP document remains far too long (at 435 pages!); it needs to be concise with a clear measurable action/delivery plan which itself needs to move from 'road strategy' to 'mode strategy'. As a consequence walking, cycling, bus and rail become the focus.

- Modal shift should be the primary target throughout the document. Without this the economic growth to which GCC, CBC and GFirst LEP aspire, as set out in the draft Local industrial Strategy will be stifled. This needs clear political leadership; the 'Boots Corner' trial demonstrated that modal shift can be achieved but it will not be universally popular. Rhetoric about brave decisions and leadership has to date not been evidenced by decision making.

- Need to align targets on climate change CBC 2030 / LTP 2050. 2050 is too late as the opportunity exists to impact the strategic allocations already made via JCS and deliver a more sustainable future for the young people of today that will be adults by 2030.

- Need for clarity over ambitions for cycling. Existing cycle routes are well-used and joint working, as with the Lansdown bridge railway station cycle link demonstrate what could be achieved but we need the resources to unlock other ambitions. The Bishops Cleeve link has been pending since the construction of the Centaur but the value of the contributions is eroded by inflation. The Cheltenham Transport Plan demonstrated the propensity to encourage cycling; it would be a mistake to 'back-pedal' on the progress achieved.

- Bus prioritisation to improve reliability and performance is critical. The Cheltenham Transport Plan demonstrated this with improvements in punctuality which went from 92.5% to 93.1% (based on all routes which cover about 2.6 million annual miles). This in turn helped to drive an extra 270,000 bus passenger journeys across Cheltenham in the first 12 months of the trial. Despite this there is seemingly still resistance to full bus prioritisation on major arterial routes and yet as Stagecoach has openly asked at the GCC engagement event would request infrastructure improvements over subsidy.

We fully recognise the infrastructure deficit that bedevils the County and appreciate the need for key infrastructure to proceed to level the playing field, crucially for Cheltenham, M5 Junction 10 and the A417 'missing link'. Only then can we seek sustainable long-term solutions as envisaged at West Cheltenham with its 'Garden Community' status, together with North West Cheltenham and trip internalisation ethos.

On this basis we would emphasise the ambitions set out in 'Connecting Cheltenham' with its 'Drivers for Change' and clear delivery targets

- Public transport interchanges (town, district and micro hubs) to support modal shift. Modal shift targets - double cycle trips; increase bus trips by 30%; retain levels of walking – all supported by behavioural change
- Cycle Cheltways – a cycle network hierarchy
- Liveable streets – a hierarchy based around cycling, public realm and delivery of borough wide speed strategy
- Strategic connections – M5 Junction 10, rail enhancements, strategic bus routes
- Technology & information to better inform choices

Councillor comments

- CBC climate target is 2030 – LTP out of step with 2050 target
- How are you going to change behaviours – big ask to bring members of the public on behavioural change journey
- Remain to be convinced in the delivery section that changes will be made. Need to prioritise. E.g. cannot see Cheltenham transport hub as a priority.
- Urban bus network isn't addressed appropriately. This is fundamental for delivery of connectivity
- Can't see that the Systra (Connecting Cheltenham) report has been properly taken into account
- LTP too long
- Speed reduction policy needed
- How much will emissions be reduced by, how much is air quality going to be reduced by? Without measurable targets is undeliverable. Why not include a target such as no AQMA's in Gloucestershire. Need to be looking at how we can move to carbon positive
- £150m of improvements over what period?
- All targets need to be quantitative and measurable. Missing the detail
- Working with districts – cannot trust GCC to deliver, e.g Boots Corner, support for planning committee
- 2km is not a comfortable walking distance for less able. Cannot assume people will walk that distance.
- All cycleways that currently exist and new need to be linked together
- Modal shift – people will not do this unless there is a clear alternative
- LTP needs to fully understand economic growth plans and the demands on transport. The impact of this on climate change is an imperative now, not in 2050
- Plan needs to be properly costed and clarity on funding. Not convinced there is currently the political will for delivery prioritised for modal shift
- Where is the space at Cheltenham rail station to develop a transport interchange/hub?
- Disappointed that no strategic aspiration is placed on modal shift. Need to be bold and say this upfront.
- GCC is getting an additional £40m+, but where is the commitment for footways and cycleways and make it easier for less able to get around by improving quality of paving
- Lack of clarity on bus subsidies
- Need to look at transport provision and interchange at the east of Cheltenham.
- Difficult decisions take bravery, but where is political bravery at GCC?
- Change will never to take place unless we take on the pressure from those that don't want change.
- Buses – make them faster, reliable
- Will be in same place in 10 years' time.

Stakeholder comments

- More serious intent that bus is a solution not an irritation. However, serious concerns if you want to deliver is not subsidy, its infrastructure. What is proposed is not going to scratch the surface of the modal shift if average speeds of the bus is not being improved, journeys not reliable.
- Need 10% fewer cars on the road – this is the scale of ambition if we are working to addressing the climate emergency. Need to be bold.
- Rail strategy appears to be out of date, references to companies that are superseded, works that have been delivered. Error on the map
- Need for greater bus priority. Need for bus lanes

- Need for better kerbside drainage if you are trying to encourage walking and cycling, improved shelter at bus stops
- Opportunity missed with current Cheltenham train station scheme, with space squeezed for additional car parking
- Massive road building programme in Gloucestershire, this isn't going to address modal shift
- Cycle networks are not particularly helpful, it takes more to get people cycling than just providing the network, this section needs to be better developed.
- GCC should investigate alternative means of funding
- Good there is recognition of climate change, but there is very little of concrete actions, or vision and action. Other councils are recognising there is a step change e.g. Manchester setting ambition for x miles of new cycle ways, traffic free town centres. Can't see anything in plan that recognises anything other than business as usual. Plan is nowhere near ambitious enough