

Appendix 2
Gloucestershire Local Transport Plan – Cheltenham Borough Council Representations

Paragraph	Issue	Cheltenham Borough Council Requested Change
General comment	Acronyms are used throughout, these should be minimised wherever possible.	Plain English document wherever possible.
General comment	We accept that the Department for Transport provides guidance setting out what is expected to be included in LTPs. However, as a result the format has resulted in a plan that at times is difficult to extract key policies and priorities. There are a number of areas where the plan provides commentary which does provide helpful background information, but is not helpful in delivering a concise plan.	Consider reordering LTP3, moving non strategy elements to appendices, or provide clear signposting of where material/data can be accessed.
General comment	<p>In total LTP3 details 95 principles and policies set out in sections 5 -11. It is not clear from the tables provided in each section what statements are principles and what statements are policies.</p> <p>Policies need to be outcome focussed and able to be monitored. In many instances the outcome of the policies are not clear with use of general terminology such as ‘to support/help district councils’ or ‘to work with partners’.</p> <p>It is important to remember that LTP3 will form a material consideration in the determination of planning applications. This means officers and members need to be able to clearly understand and interpret the policies of the plan.</p>	<p>Reconsider way in which LTP3 presents principles and policies.</p> <p>Develop a referencing system for the principles and policies in each thematic chapter.</p>
General comment	It is not easy to relate the summary document to the strategy.	Reconsider summary document.
General comment	We accept that LTP3 represents a point in time; however at the time of publication the plan is already out of date following the revocation of the RSS. The plan needs to be flexible and not be fixed to either a point in time or a context that may change significantly over the lifetime of the document.	<p>Ensure that LTP3 is flexible and can respond effectively to changes at national and local levels.</p> <p>Remove all references to the RSS.</p>

General comment	The Coalition Government has placed an emphasis on localism. It is not clear from the draft LTP3 how this can be captured in transport. How can communities be empowered to identify and help deliver local transport solutions?	Consider how localism can be embedded within LTP3.
General comment	Plans are produced at a scale that is illegible; many of the keys cannot be read which means the plans/maps cannot be properly interpreted.	Improve graphics.
General Comment	<p>The Government is promoting a collaborative and multi-disciplinary approach to design in the built environment and streets in particular. This enables a range of professional (and lay) inputs into the design process to take place at early stages. It recognises that street design impacts not only on traffic, but other matters such as visual quality, economic prosperity and environmental health. It is an approach heavily promoted in Manual for Streets and LTN 1/08 (Traffic Management and Streetscene) and LTN 3/08 (Mixed Priority Routes: Practitioners' Guide). These documents also promote the use of Quality Audits – as being “entirely complementary to the goal of collaborative, inclusive and quality design” (LTN 1/08 para 3.9.1). It is also evident these ways of working, promoted by Government, are likely to be endorsed in Manual for Streets 2.</p> <p>This approach is important to the delivery of most highway projects (capital or maintenance) - particularly in the town and city centres and in conservation areas throughout the county.</p> <p>It is an approach which is not recognised in the draft LTP3.</p>	<p>Introduce objectives and policies which make the collaborative, multi-disciplinary approach to the design of highway projects central to draft LTP3.</p> <p>Introduce policies which ensure that Quality Audit as standard on all highway schemes.</p>
Section 1 – Summary		
General	Duplication	Suggest a stand alone executive summary is prepared and chapters 2 -4 merged to provide a trimmed down and more concise introduction.
1.1	This section of the document is unclear. A summary should be a drawing together of key points of reference of LTP3. However, the vision is set out briefly in the	<p>Redraft section 1.</p> <p>Reconsider vision; ensure the vision is supported</p>

	<p>summary and does not appear elsewhere.</p> <p>The vision needs to be further developed. It does not provide a clear context to explain what will be achieved by 2026 or provide a clear position on modal shift. The vision should give shape and direction to the LTP; given its end date of 2026 it should be both aspirational in its intentions and inspirational to stakeholders. Given that LTP3 is delivering an integrated transport system for Gloucestershire, it should reflect this localised context. The vision should be supported by a concise set of clear and measurable objectives.</p> <p>It is noted that 5 goals are provided as set out in LTP3 guidance provided by the Department for Transport (DfT), but these are too broad. To relate to stakeholders more effectively these goals need to be localised, establishing clear and measurable goals relevant specifically to Gloucestershire.</p>	<p>by clear and effective objectives.</p> <p>If DfT goals are to be used, then these need to be related to the Gloucestershire context.</p>
1.3	It is not clear what this paragraph refers to in reference to direct control. Is the reference to Gloucestershire County Council or County plus districts?	Reword paragraph to clarify.
1.3 – 5 th bullet point	See comments above. If this relates only to Gloucestershire County Council activities, then expand to read ‘the scale, rate and location of new development’	Amend bullet point.
1.4	A clear link should be made here to the Strategic Infrastructure delivery Plan (SIDP) which will be a tool in helping to deliver LTP3.	Add reference to SIDP.
1.4	A reference to political uncertainties that potentially will affect transport and the wider planning framework would be helpful here to set the context for LTP3.	Add a short paragraph clearly setting out the political context.
1.5	Are the bullet points in any priority order? The main challenge is the need for behaviour change in the way people travel - LTP3 should seek to ensure the low carbon travel agenda is both understood and embraced.	Ensure message of low carbon travel is explicit.
1.6	This section is unclear; wording of dispersal could be interpreted in many ways. The focus for good planning continues to be focussed on sustainable development,	Clarify wording.

	therefore whatever the level of development requirements the key urban areas of Cheltenham and Gloucester will continue to play the principal roles of service and business centres.	
1.10	Consultation was undertaken during 2009/10 on the emerging Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS). This resulted in both broad and detail comments from stakeholders and members of the public on transport issues. This information has been provided to Gloucestershire County Council. This should also be used to help inform LTP3.	Reflect key issues arising from JCS consultations.
1.19	<p>We accept that park and ride plays an important role in the integrated transport solution for the urban areas of Cheltenham and Gloucester. However, LTP3 must recognise that communities will be affected by the development of a park and ride facility. It is therefore important that relevant communities and stakeholders are engaged as early as possible in the site identification process.</p> <p>It is not clear from LTP3 whether the proposed park and ride at Elmbridge differs from proposals previously submitted as a major scheme linked to the Gloucester Parkway proposal. This needs clarification.</p> <p>Identification of a park and ride at Brockworth is noted. As indicated in appendix 2 it is proposed that this site replaces the site formally indicated at Shurdington to provide a facility that supports both Cheltenham and Gloucester.</p> <p>No detail is provided on the potential location of the Uckington site or West of Severn site.</p>	Further detail required on the size and location of the proposed park and ride at Brockworth, Elmbridge, Uckington and West of Severn.
1.19 – 4 th bullet point	This should be within the context of SIDP.	Make link to SIDP.
1.32	Is need for all-ways M5 J10 only required in response to the potential development at north west Cheltenham? Cheltenham's business and out of centre retailing is located to the north west of the town, and all movements	Reconsider basis for lobbying Government on M5 J10 major scheme.

	junction would improve accessibility and remove through traffic from the town centre.	
1.36	Uncertainties in changes to government transport and planning policies should be added to this list of risks.	Ensure political risk is reflected. Could a detailed risk assessment be deleted here and added as an appendix?
Section 2 – Background to LTP3		
2.4	Remove reference to regional strategies, this is no longer relevant.	Update in light of changes to planning framework.
Section 3 – Transport in Gloucestershire		
General	Although this section provides a lot of information, some data has little justification to explain what message it is trying to provide. Some plans/diagrams are difficult to read.	Reconsider role and purpose of this section. Consider extracting non essential information into a relevant appendix.
3.10	It is unclear what projected levels of population increase and housing numbers have been used to predict the 2026 traffic levels. We assume these are levels set out in the Regional Spatial Strategy for the South West. This plan has been revoked. Gloucestershire districts have agreed to work collaboratively on preparing revised projections. The outputs of this work are expected at the end 2010.	Refresh projections prior to final publication of LTP3 to reflect locally derived housing numbers.
3.11	The high level of car ownership is noted; however this level needs to be placed within context of accessibility. In some locations accessibility to work, services and facilities is extremely limited without access to the private car. Real choices in transport should not penalise the many people who have to use the car for their journey. Incentives to use alternative modes should be based on improving quality rather than just restricting car travel.	The accessibility to local transport needs to be properly reflected with consideration given to the various movements such as between employment centres. .
3.50	Update. Regional Spatial Strategy for the South West has been revoked.	Update.
Section 4 – Consultation and Option Assessment		
General comment	Consultation was undertaken during 2009/10 on the emerging Gloucester, Cheltenham and Tewkesbury JCS. This resulted in both broad and detail comments from stakeholders and members of the public on transport issues. This information has been provided to Gloucestershire County Council. This should also be used	Reflect key issues arising from JCS consultations.

	to help inform LTP3.	
Section 5 – A Greener Healthier Gloucestershire		
General comment	Other than identifying public transport as an element in ‘Smarter Choices’ and ‘Active Travel’ no reference is made to public transport in this section. Although covered elsewhere in LTP3, encouraging the use of public transport is an important element in contributing to a greener healthier Gloucestershire	Make specific reference to the contribution public transport can make and link to relevant sections elsewhere in strategy
General comment	Walking is covered in terms of developer travel plans and supporting schools and employers to increase walking, but there is no commitment to improving existing infrastructure to improve the walking experience and make it a more attractive option	Reflect the need to improve parts of existing infrastructure as a means of encouraging walking.
General comment	No real link is made in this section to previous data quoted on high car ownership and the number of people from rural communities who visit Cheltenham for employment/shopping and leisure. It would be helpful to pick out interventions which could positively encourage rural communities to consider low carbon travel options.	More awareness of rural dimension in terms of delivery of LTP3.
5.4	Action plans for AQMAs should ensure that the wider environment is taken into account, including affect of interventions on the public realm. Cheltenham Borough Council is developing its Air Quality Action Plan. This is intended to help develop the Borough Council’s regeneration activities via the Cheltenham Development Taskforce. The aim is to provide a blend of works which will be effective both in reducing pollution and enhancing the street scene	Principles of AQMAs to reflect impact on quality of built environment.
5.4	This table contains no reference to walking or to public transport	Identify principles and policies for walking and public transport and/or cross reference to other parts of the strategy. Policies need to recognise and understand the differing requirements of walkers, cyclists and public transport users and not apparently place them in the same policy areas.
5.4	There is no reference in draft LTP3 to streets trees - their	Identify principles and policies for street trees and

	management; the introduction of new street trees; or the benefits of trees to environmental quality (including air quality and biodiversity), health and wellbeing and visual enhancement.	cross reference to other parts of the strategy. This needs to cover at least the following: <ul style="list-style-type: none"> ○ Maintenance of existing stock ○ Planting for the future to maintain at, a minimum, current levels ○ The development of a tree strategy, in conjunction with District Councils ○ Adoption of a code of practice for utilities working around trees (e.g. NJUG4)
5.4	There is no reference in LTP3 to biodiversity and particularly Highways & Biodiversity 2009-2014 – the Highways Biodiversity Plan for Gloucestershire. Highways and highway assets are a rich source of habitat, recognised in the Biodiversity Plan.	Identify principles and policies for biodiversity which recognise the importance of highways to biodiversity and encourage highway schemes to promote biodiversity.
5.4	Resources for cycling - for routes to be effective, they need supporting infrastructure (covered and secure parking in particular).	Resources should be aimed at promotion, routes and supporting infrastructure.
5.4	New highway schemes - Increasing cycling and walking is dependent on a range of factors – this includes not only provision of facilities, but creation of an attractive environment, provision of appropriate infrastructure (e.g. seating en route), amongst a host of others. A simple cycling and walking audit is unlikely to identify this, and if undertaken separately may be in conflict with other audits (e.g. safety, access, visual quality audits, public transport etc). Manual for Streets and LTN 1/08 (Traffic Management and Streetscape) promote Quality Audits which are “entirely complementary to the goal of collaborative, inclusive and quality design” (LTN 1/08 para 3.9.1). LTN 3/08 (Mixed Priority Routes) develops the multi-disciplinary approach for complex mixed use areas.	Delete reference to cycle and walking audits and include a requirement for Quality Audits in all appropriate sections of draft LTP3
5.4 table	Cycle parking - the most effective way of ensuring parking (and other elements) is included in a development proposal is to include it in the scheme design. Conditioning items is not an effective means of integrating them fully into the design or securing their provision.	Delete “as a condition”.
5.4 table	Many AQMAs will benefit from alterations to the highway networks and traffic management regimes in their	Add to the end of the sentence “and will ensure that GCC projects and schemes contribute

	<p>immediate areas. This requires the County Council to do more than “help” District Councils to develop and implement action plans. It requires the County Council to be actively involved in the development and implementation of action plans; and to ensure that any highway schemes in or close to AQMAs are designed to meet AQMA objectives. This is another area where a multi-disciplinary approach to street design would reap benefits.</p>	<p>positively to AQMA objectives where they impact on them.”</p> <p>Delete “help them”</p>
5.4 table	<p>Car Clubs -The policy needs to be more assertive. It needs to have a specific target for the development and implementation of at least one car club in the town.</p>	<p>Set a specific target date for the establishment of a car club in Cheltenham.</p>
5.4	<p>Electric cars – This section is insufficiently robust. It is apparent that electric cars are likely to play an important role combating climate change and that lack of charging points is a major issue in slowing their roll-out across the country. The use of the words “where appropriate” in the policy implies that there is unlikely to be a robust approach to seeking the provision of charging points and other necessary infrastructure – they will be needed on all significant developments (housing, employment, and retail).</p>	<p>Delete “where appropriate”</p>
5.7	<p>Why is extension of car club facilities limited to Cheltenham? Paragraph 5.49 notes that a car club already operates in Stroud. There needs to be a County wide strategy to car clubs.</p>	<p>LTP3 to investigate potential of a Cheltenham car club that links into other employment and retail centres across the County.</p>
5.7	<p>Smarter Travel is also about the design and layout of new developments and the relationship between land uses. It is important that the County Council uses its influence to ensure that new developments are designed and located in a manner which encourages smarter travel choices.</p>	<p>Introduce references to site layout, land use and the relationship to smarter travel.</p>
5.15	<p>Many AQMAs will benefit from alterations to the highway networks and traffic management regimes in their immediate areas. This requires the County Council to do more than “help” District Councils to develop and implement action plans. It requires the County Council to be actively involved in the development and implementation of action plans; and to ensure that any</p>	<p>Make clear in LTP3 that GCC highway schemes have a role to play in addressing and contributing to meeting AQMA objectives.</p>

	highway schemes in or close to AQMAs are designed to meet AQMA objectives.	
Section 6 – Delivering Sustainable Economic Growth		
6.5	This table should make the connection with limitations identified in table 3.32 to rail facilities. Connections with a number of stations via public transport are severely limited.	LTP3 should work towards delivering improvements to rail stations including accessibility to key business and service locations via public transport.
6.5	Support for investigating the Community Infrastructure Levy is welcomed. The evidence to support a future levy will be provided by SIDP. In order to effectively deliver LTP3 the intelligence of SIDP is critical.	LTP3 should make the commitment to continue SIDP. Phase I and II have been completed, but funding and officer resource to complete phase III is currently uncertain. This resource needs to be identified.
6.5	We support the statement on parking policies. However the statement requires some qualification and expansion. Cheltenham’s current pricing policy encourages the use of peripheral long stay car parks and discourages the long stay use of town centre car parks thereby attempting to reduce town centre congestion and pollution without damaging the local economy. More detail needed here to clearly set out what more can be achieved.	More detail required. Reference to the newly established Cheltenham Parking Board is required. Reference that an holistic approach to parking, in particular identifying the outcomes/benefits expected of a parking strategy.
6.5	Rail commuting to Cheltenham/Worcester/Malvern is poorly served – the journey is easily commutable by road. Rail times are better than road, but service is at best 2 hourly during commuting times. Rail services should be brought up to an hourly Worcester-Gloucester service to promote modal shift.	Add Worcester as a target for improved rail links.
6.5	The contribution which GCC makes to economic regeneration as a highway authority is not limited to its impact on guidance. Quality streetscene in town centres is important to economic prosperity. Poorly maintained streets or highway schemes which fail to consider context or enhance opportunities for innovative solutions, use of the public realm for uses other than transport can have a significant negative impact.	Add “... and will consider contextually sensitive, innovative street design and traffic management solutions in order to contribute positively to regeneration.
6.5	Enhanced materials - The policy is weak – its reference to promoters of regeneration schemes being “aware” of the enhanced materials policy is not sufficiently robust. Additionally, the Enhanced Materials Policy is an	Add sentence requiring promoters of regenerations schemes and developers generally to comply with the enhanced materials policy and to ensure designs respond to context.

	opportunity to respond to context in the selection of materials. This benefit needs to be stressed.	
6.5	Transport infrastructure - The scope of the policy needs to be expanded to ensure that developers ensure transport infrastructure is provided to accommodate growth in all classes of development (not only housing)	Delete "housing growth" and replace with "development"
6.5	New development - Encouraging use of sustainable transport modes requires not only linkages but a consideration of the location of the development in question; its street pattern and layout; and its street design. This is so that linkages are convenient, safe, functional and designed to maximise opportunities for pedestrian, cycling and public transport use.	Add "...and that they are laid out in a manner which encourages travel by sustainable transport modes."
6.7	Update. Regional Spatial Strategy for the South West has been revoked.	Update.
6.10	Update reference to Civic Pride here and elsewhere to reflect rebranding of this project. Now entitled Cheltenham Development Taskforce.	Update.
6.9 – 6.15	A reference in this section to the Gloucester, Cheltenham and Tewkesbury JCS would be helpful. The JCS area is the economic centre of Gloucestershire and will help deliver the key regeneration activities of GHURC, Cheltenham Development Taskforce and Tewkesbury Town Centre Masterplan.	Reflect role of JCS.
6.16 – 3 rd bullet point	Link should also be made here to SIDP. SIDP is a 'working tool' that can be updated as appropriate to reflect changing local circumstances and national priorities unlike LTP3 which when adopted will reflect a point in time. Making the link to SIDP will help maintain the currency of LTP3	Make link to SIDP.
6.16	We suggest that a new bullet point be added – We will work with districts to assess strategic infrastructure required to deliver levels of development identified within broad areas of growth identified via local development frameworks.	Add new bullet point.
6.17 – 6.19	Reference to parking policies are noted, however further detail is required.	More detail needed here to clearly set out what more can be achieved.

		Reference to 6.5
Section 7 – A Safer Securer Transport System		
General Comment	The vision of LTP3 is “promoting a safe and sustainable transport network” but actually contains much less detail on safety than does LTP2 where safety was a lesser part of the vision. Indeed in LTP2 there was a whole appendix (53 pages) devoted to road safety. Obviously the plans for safety were successful as the road accident figures for Gloucestershire have reduced significantly to the lowest since the authority was established in 1974 and the County Council is to be congratulated on this.	There should be more about emphasis on safety, in particular about the safety of pedestrians, since the County Council wishes to promote walking as a healthy lifestyle choice. Over the period until 2026, we know that there will be demographic change to a more elderly population in which trips and falls have a far greater impact, impinging on health and social services budgets.
7.1	There is little reference in this section to a “securer” transport system.	Expand to include detail of meaning of “securer”. Does it refer to reliability of (public) transportation and/or personal perceptions of security when using the highways?
7.3	A complete approach to road safety should include an understanding of place and context and make use of soft design and psychological measures, landscape treatments and others. as well as “engineering, education and enforcement “	Expand this policy to introduce recognition of the range of skills and techniques needed to deliver a complete road safety package.
7.6	Costs of death and injury should be added.	Costs to include those to Health and Social Services
7.15 – 7.19	In addition to 20mph zones, consideration could be given to introducing 20mph speed limits across communities and neighbourhoods where appropriate and where there is local support, as suggested by the 20’s Plenty campaign Consideration also to be given to reducing 40mph limit to 30mph on major roads passing through built-up areas	Include commitment to consider 20mph speed limits across communities and neighbourhoods where there is local support. Include commitment to consider 30mph speed limits across communities and neighbourhoods where there is local support
Section 8 – Good Access to Services		
8.2	Reference to community transport is welcomed in enabling access to jobs, services and leisure. However, this is not expanded upon in this section. LTP3 needs to clearly recognise the needs of communities and provide a	Clear strategy required.

	strategy that sets out how community transport will be integrated.	
8.4	<p>Identification of park and ride sites is noted.</p> <p>Communities will be affected by the development of a park and ride facility. It is therefore important that relevant communities and stakeholders are engaged as early as possible in the site identification process.</p> <p>For consistency make reference to Brockworth/Shurdington park and ride or clarify which location park and ride is proposed.</p>	Further detail required on the size and location of the proposed park and ride at Brockworth, Elmbridge, Uckington and West of Severn. Clarify broad location of proposed facilities.
8.4	<p>Reference to mass transit systems in Gloucester and Cheltenham needs further detail to be provided. Currently the Honeybourne Line in Cheltenham is safeguarded for a potential transport system. If required, further safeguarding may be required via the Gloucester, Cheltenham and Tewkesbury JCS. LTP3 needs to provide more definitive guidance on this potential scheme.</p> <p>A light rail system was proposed in the Gloucestershire Joint Air Quality Strategy to connect the burgeoning residential development areas at Gotherington/Bishops Cleeve/Cheltenham Spa (Network Rail)/Gloucester Parkway (proposed) /Gloucester City (Network Rail)/Quedgeley. Connection to the GWR System for onwards travel to Honey Bourne (Net Work Rail connection) would be useful.</p>	Clarify role and function of mass transit system.
8.7	<p>Bullet points 2 and 3 are not relevant in this section, which relates to proposals for the bus network</p> <p>The timescale for developing a high quality bus network, i.e. from 2014, is disappointing and does not sit well with the aspirations for a greener healthier Gloucestershire or for enabling people to make smarter travel choices</p>	<p>Delete bullet points 2 and 3</p> <p>Consider bringing timescale forward</p>
8.9 – 8.13	We support the concept of park and ride transport hubs. However, LTP3 does not clearly define how these would function in practice. Evidence from best practice	Clarify role and function of park and ride transport hubs. Ensure impact on adjacent communities is assessed in considering options for transport

	elsewhere would be helpful here. If park and ride facilities adopt a more important role, this may impact on local communities. This needs to be carefully considered.	hubs.
8.12	<p>Identification of park and ride sites is noted.</p> <p>Communities will be affected by the development of a park and ride facility, it is therefore important that relevant communities and stakeholders are engaged as early as possible in the site identification process.</p>	Further detail required on the size and location of the proposed park and ride sites. Clarify broad location of proposed facilities.
8.16	There needs to be a wholesale review of the quality of rail. This needs to look beyond an audit of facilities and move towards a co-ordinated programme of improvements which incorporates landscape and high design quality in order to make stations attractive to users.	Add section on the need for a programme of wide ranging improvements to stations which looks beyond facilities and considers quality and the creation of decent places around our stations.
8.18 – 18.21	Reference to 8.4 and light rail scheme	<p>The reference made does not reflect the considerable amount of work and progress made on the local light rail scheme proposed for Cheltenham, which has received support from many key stakeholders in Gloucestershire.</p> <p>Engagement with the Light Rail scheme project group would seem sensible with consideration given in LTP3 to the advances in development of new technology.</p> <p>This should take into account support for any potential external funding schemes that may advance the timeline for the introduction of new and affordable technology.</p>
8.21	Reference to the role of community transport is welcomed. However, as drafted this paragraph sets out a vision rather than a clear strategy of how community transport will be developed.	Clearly set out the strategy for community transport.
8.33	Encouraging cycling and walking needs a more sensitive approach to street design than currently is delivered in highway capital and maintenance scheme. It needs a recognition that people are more likely to walk or cycle in streets and spaces which are pleasant to be in and where	Introduce recognition of the need to create attractive places in order to encourage cycling and walking.

	they feel safe and comfortable – it is more than a “road design” exercise, it is about creating places. This approach needs to be recognised LTP3 and delivered in practice by delivering schemes in conjunction with local partners and designers.	
8.33	There is a need to develop a more integrated approach to walking and cycling. Walking gets little mention in LTP3 but is part of every journey (no matter what the main mode) and, with cycling, has an ability to be a major contributor to sustainable transport in Gloucester, Cheltenham and the market towns. To achieve this there needs to be proper consideration of facilities at all transport interchanges to ensure that all potential users are catered for – e.g. how do bus stops manage the needs of cyclists who are parking up to catch buses.	Consider how the needs of all users can be catered for at modal interchanges.
Section 9 – Managing our Highways		
General Comment	We welcome the acknowledgment of the contribution which higher quality materials make. However LTP3 could go further in its commitment to improving the quality of the environment of Gloucestershire by a clear commitment to work with District Council design teams to ensure that highways works enhance the quality of the built environment.	Consider how LTP3 could move towards a more “shared space” ethos within highways/urban design, including embedding urban design within the strategic objectives of the plan.
General Comments	<p>LTP3 needs to acknowledge that the management and design of highways, streets and spaces is more than an engineering function and of interest to communities and individuals throughout the County.</p> <p>Manual for Streets, LTN 1/08 and LTN 3/08 all promote a multi-disciplinary/multi-organisation approach to street design from project inception and the use of Quality Audits to monitor a designs performance against a range of criteria and interests.</p> <p>The Government now talks about “streets” rather than “highways” or “roads”. This recognise the total function of our streets and spaces as places for people, exchange, social interaction, events, the “front door” of our town</p>	LTP3 should embrace a more holistic approach to street design – acknowledging the many functions of streets, the wide range of stakeholders in our streets and the changing ways that people and communities are becoming involved in the design of their towns and streets.

	centres as well as places for traffic movement.	
9.28	<p>It would be a step forward if the document referred to the use of the English Heritage and Department of Transport “Streets for All” document as guidance for highways works within historic environments, i.e. Conservation Areas, settings of Listed Buildings and buildings of local importance, Historic Gardens etc. This does not accord with Gloucestershire County Council’s Enhanced Materials Policy, but it should be considered in order to avoid excessively “engineered” solutions in our most sensitive built environments.</p> <p>Manual for Streets 2 will be published in October 2010. It will extend the scope of Manual for Streets to allow its principles to be applied to a highway regardless of speed limit and make MfS the starting point for any scheme affecting non-trunk roads.</p>	Greater consideration should be given to the historic environment. LTP3 and Gloucestershire County Council’s policy on enhanced materials should be reviewed to appropriately reflect English Heritage and Department of Transport “Streets for All” document; local adopted documents (e.g. public realm strategies, urban design frameworks or conservation area character appraisals and management plans); and manual for Streets 2.
9.31	Manual for Streets & LTN1/08 identify Quality Audits as the most effective way to audit streets design. These include audits of a range of interests and should be used instead of individual audits.	Delete reference to “...safety audits and user audits, including cycle and pedestrian audits...” . Replace with “Quality Audits” and add to the end of the sentence “...and delivers a range of other benefits.”
9.32	The Enhanced Materials Policy is a great step forward in securing quality design and ensuring it is maintained. However, there needs to be a clear link to an understanding of “context”. References to the Enhanced Materials Policy should identify that this is an important element of the policy.	Introduce reference to a requirement for materials to be appropriate to “context”.
Section 10 – Area Transport Strategies		
General comment	This project considers key regeneration sites within the town centre, including accessibility, but also provides an opportunity to deliver against the AQMA action plan providing a blend of works which will be effective both in reducing pollution and enhancing the street scene.	
10.6	Correct terminology should be used – JCS is the acronym for Gloucester, Cheltenham and Tewkesbury Joint Core Strategy.	Update.
10.6	Consultation was undertaken during 2009/10 on the	Reflect key issues arising from JCS consultations.

	emerging Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS). This resulted in both broad and detail comments from stakeholders and members of the public on transport issues. This information has been provided to Gloucestershire County Council. This should also be used to help inform LTP3.	
10.7	<p>Identification of a park and ride at Brockworth is noted. As indicated in appendix 2 it is proposed that this site replaces the site formerly indicated at Shurdington to provide a facility that supports both Cheltenham and Gloucester.</p> <p>Further detail required on proposed site West of Severn.</p> <p>Further detail required on proposed Elmbridge site</p> <p>Further detail required on proposed Uckington site</p> <p>Communities will be affected by the development of a park and ride facility. It is therefore important that relevant communities and stakeholders are engaged as early as possible in the site identification process.</p>	Further detail required on the size and location of the proposed park and ride sites. Clarify broad location of proposed facilities.
10.7	The Tatchley Lane Link is identified in the preferred strategy, Cheltenham Borough's view is that the need for this should be reviewed and LTP3 should reflect this.	Reconsider the need for the Tatchley Lane Link
10.8	A link should be made to emerging Gloucester, Cheltenham and Tewkesbury JCS and SIDP in reference to requirements linked to strategic housing objectives.	Make link to SIDP.
10.8	This table needs to be reconsidered. The emphasis should be on integrated transport and how this can be successfully delivered.	Reconsider inter-relationships between transport modes.
10.32	It should be made clear in this section which three districts form the JCS area.	Update.
10.32	Consultation was undertaken during 2009/10 on the emerging Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS). This resulted in both broad and detail comments from stakeholders and members of the	Reflect key issues arising from JCS consultations.

	public on transport issues. This information has been provided to Gloucestershire County Council. This should also be used to help inform LTP3.	
10.36 – 10.41	Remove reference to regional strategies, this is no longer relevant. This section needs to be rewritten in the context of the revocation of the RSS and the emerging JCS.	Update in light of changes to planning framework.
10.46	A link should be made to emerging Gloucester, Cheltenham and Tewkesbury JCS and SIDP in reference to requirements linked to strategic housing objectives.	Make link to SIDP.
10.46	We support references to improving information about public transport. However, this should go further with an emphasis on integrated transport and how this can be successfully delivered.	Reconsider inter-relationships between transport modes.
10.46	Action plans for AQMAs should ensure that the wider environment is taken into account, including the effect of interventions on the public realm. Cheltenham Borough Council is developing its Air Quality Action Plan. This is intended to help develop the Borough Council's regeneration activities led by the Cheltenham Development Taskforce. The aim is to provide a blend of works which will be effective both in reducing pollution and enhancing the street scene	Principles of AQMAs to reflect impact on quality of built environment.
10.46	This section includes no policies on community strategy and how this can be integrated.	A clear strategy is needed on integration of community transport.
Section 11 – Implementation Plan		
11.26	<p>We accept that over the lifetime of LTP3 there will be fewer resources available to invest in transport schemes and interventions across Gloucestershire. It is therefore important that clear priorities are set out within the plan.</p> <p>It is evident, particularly in the short term (2011- 2014) that resource hungry schemes will not be brought forward. The focus therefore should be on schemes that will lead to cultural change – addressing transport behaviours and encouraging modal shift through localised solutions and investment in education/awareness.</p>	Consider opportunities that will have an impact on individual's behaviours - in the way people travel.
11.26		
11.27	Identification of a park and ride at Brockworth is noted. As	Further detail required on the size and location of

	<p>indicated in appendix 2 it is proposed that this site replaces the site formerly indicated at Shurdington to provide a facility that supports both Cheltenham and Gloucester.</p> <p>Communities will be affected by the development of a park and ride facility, it is therefore important that relevant communities and stakeholders are engaged as early as possible in the site identification process.</p>	<p>the proposed park and ride at Brockworth. Clarify broad location of proposed facility.</p>
Section 12 - Monitoring No comments		
Section 13 – Glossary No comments		
Section 14 – Supporting Documents		
Appendix 1	Policy context as presented is no longer current.	Revise appendix 1.
Appendix 2	<p>Accept that park and ride plays an important role in the integrated transport solution for the urban areas of Cheltenham and Gloucester. However, LTP3 must recognise that communities will be affected by the development of a park and ride facility. It is therefore important that relevant communities and stakeholders are engaged as early as possible in the site identification process.</p> <p>It is not clear from LTP3 whether the proposed park and ride at Elmbridge differs from proposals previously submitted as a major scheme linked to the Gloucester Parkway proposal. This needs clarification.</p> <p>Identification of a park and ride at Brockworth is noted. As indicated in appendix 2 it is proposed that this site replaces the site formally indicated at Shurdington to provide a facility that supports both Cheltenham and Gloucester.</p> <p>No detail is provided on the potential location of the West of Severn site or Uckington site.</p>	<p>Further detail required on the size and location of the proposed park and ride sites at Brockworth, Elmbridge, Uckington and West of Severn.</p>