

Strategic Planning  
Shire Hall  
Westgate Street  
Gloucester  
GL1 2TH

Date

Dear Sir / Madam,

**GLOUCESTERSHIRE LOCAL TRANSPORT PLAN 2015/31 – PUBLIC CONSULTATION**

Thank you for consulting Gloucester City Council on the above draft plan. The response below is provided by Planning Services and is structured in accordance with the consultation questionnaire.

**Question 1: Do you agree with the proposed Link and Place Hierarchy for 2031?**

The Council broadly agrees with the hierarchy but would like to express the following concerns:

- Some of the language used is vague and there is a concern that this will not have the 'teeth' to ensure the strategy is effectively delivered.
- It is unclear how the strategy is going to be enforced? Will there be traffic orders, speed restrictions, or would they just be voluntary?
- There is a concern that the areas identified in red will become 'no go areas' for vulnerable road users. It is important to ensure that provision is made to protect cyclists in these areas.
- There needs to be more in the Active Travel section (2.4.1) on the benefits to health of these modes of transport and the role that active travel can play in helping to reduce obesity especially in the urban areas where these travel choices are more easily accessible and affordable. More needs to be made of the public health benefits of active travel (suggest regard should be had to work undertaken by Dr Adrian Davis on behalf of Bristol City Council – evidence base can be found at [www.travelwest.info/evidence](http://www.travelwest.info/evidence)).

**Question 2a: Do you agree with the proposed Advisory Freight Route Map?**

**Question 2b: Should any changes be made to the Advisory Freight Route Map?**

The Council broadly supports this concept, however would like to make the following comments:

- The plan needs to make provision for lorry layover at Barnwood. Large CATONE lorries regularly park adjacent to the road at Barnwood on the County owned A40 & on the 'C&G' roundabout – any delivery of Elmbridge park and ride scheme could

potentially also include lorry lay over facilities that could be used in the evening when the park and ride is not in use. This must be a point when drivers need to stop for tachometer reasons – better to plan for it than to have the enforcement issues that currently arise at this location.

- Figure 5 'LTP Advisory Freight Route Map' appears to suggest the route will run along the A38 (Cole Avenue), over St Barnabus Roundabout and onto the A38 Eastern Avenue. As the County Council will be aware, this road is already operating beyond capacity and at times at a dangerous level. Significant improvements will be required to this roundabout if designated a key route for freight in order that it can accommodate the additional number of large vehicles.

### **Question 3a: Do you support the proposed LTP Policies?**

The City Council broadly supports the proposed LTP policies. However, the following additional comments are made:

- Policy 1 - 'Network management – Operation': This policy needs to address the use of materials in creating road surfaces that do not disintegrate quickly, creating potholes. This is a common issue at present.
- Policy 1.4 – 'Network resilience': It is suggested this policy should include a commitment to working with specialist bodies such as the Environment Agency and Highways Agency in planning / providing for a resilient transport network.
- Policy 2 – 'Network management – Investment': This policy should commit to investment in strategic sustainable links to drive a modal shift in urban and inter-urban areas. The policy is heavily focussed on vehicular transport and provision should also be made for more sustainable modes such as walking and cycling.
- Policy 3.1 – 'Development': The wording of this policy is weak – developers should be required to do more than 'consider' the impact of the development on the Highway Network. JCS Submission Policy INF2 requires developers to 'assess the impact'. It is suggested LTP Policy 3.1 be amended to reflect this.
- Policy 3.3 - 'Promotion of Travel Choice in New Development': This paragraph should require engagement between Local Planning Authorities, developers and local public transport operators, to ensure that all new development is integrated into the existing public transport network and provision is made in strategic developments for the provision of useable bus routes from the outline planning stage.
- Policy 5.3 – Increasing Levels of Physical Activity: This should read 'GCC will actively work...' It should also cross reference to the Public Health benefits of Active Travel. The policy could also be expanded to encourage people to walk / cycle longer than 'short distance trips'.
- Policy 6.1 – Air Quality and Noise Pollution: This policy is a little weak and should include reference to the need to reduce particulate emissions as a priority in urban areas. Furthermore, there is a link here to the positive environmental impacts of people choosing sustainable modes of transport rather than the private car – suggest reference is included.
- Policy 7.5 – School Transport: This policy should include a commitment to creating safer routes to schools.

### **Question 3b: Do you think there are any policy areas missing?**

The City Council suggests the following policy commitments should be made:

- Introduce 20mph limits in all residential areas.
- Develop a comprehensive network of cycle routes.
- Create pedestrian friendly environments and routes in all urban areas.

- Reduce accidents on non-urban routes.

As a general comment it is noted that the need to manage highways responsibly and safely does not feature prominently in the document.

**Question 4a: Do you agree that the Central Severn Vale CPS identified meets the proposed LTP objectives?**

This section of the document does not make a link between the need to drive modal shift and the objectives of reducing congestion. If conditions are created whereby people are attracted out of their cars and into more sustainable modes of transport, this will in turn reduce overcapacity on the highway network. This is something that has been achieved in other areas.

At present the document does not include any proposals to enhance the experience for cyclists or pedestrians in Gloucester by creating safer links or improving existing routes into and out of the urban core. There is also a concern that identified highways capacity improvements and junction improvements could lead to higher speed and more hostile road environments if their safety and needs are not considered carefully.

Improvements to cycle infrastructure along major routes such as the inter-urban commuter routes between Cheltenham and Gloucester hold the greatest potential for modal shift. Enhancements to the existing cycle routes and creation of improved cycle routes out along the Sharpness canal and to Stroud from Gloucester and also across the Severn to the Forest should also be included along with a Gloucester Tewksbury cycle route.

More specifically, the City Council has the following comments:

- Types of issues to be considered: This should include 'Campaigns to promote Active Travel as a public health benefit' (refer to question 1, bullet 4 response above).
- Churchdown and North of Churchdown Initiatives: This should consider the possibility of re-opening Churchdown railway station/rail halt. This would encourage walking to the rail station and use of train to either Gloucester/Cheltenham or Bristol/Birmingham than the car.
- Gloucester Initiatives: Needs more references to improving cycling within the City, for example the introduction of '20's Plenty' Campaign in residential areas.

**Question 7: Do you agree with the proposed Levels of Service for Highways Maintenance as set out in the Asset Management Strategy?**

It is suggested that all Sustrans routes could be adopted as part of the highway network. Also that there should be better maintenance and repairs of pedestrian and cycle routes which will help drive modal shift onto more sustainable routes.

I trust the above comments are useful and will be given due consideration in the preparation of the revised Local Transport Plan.

If you have any questions or would like to discuss anything further please do not hesitate to contact me.

Yours sincerely.