

February 23rd 2021

**By e-mail only: idkemp@icloud.com**

Ian Kemp  
Programme Officer  
Gloucester City Plan Examination  
PO Box 241  
Droitwich  
WORCESTERSHIRE  
WR9 1DW

Dear Mr Kemp,

**Gloucester City Plan – Examination in Public****1. Opening Comments and Background**

Stagecoach welcomes the opportunity to continue our participation in the preparation of the Gloucester City Plan through this very important examination stage. We wish you and the Inspector well in this task and we trust the following points evidence our commitment to offering as much constructive input as we can to the process.

Stagecoach submitted a number of representations in respect of the Regulation 19 Pre-Submission Plan, in February 2020. This was somewhat before the COVID crisis became apparent, and the events that followed are likely to define a major discontinuity in a number of areas, as well as accelerating already-established trends in travel behaviour. This obviously includes use of public transport which was affected not only directly by the “lock downs”, but by consistent government messaging over the last year that public transport was in some sense particularly dangerous compared with other permitted activities, such as visiting a supermarket, despite the lack of evidence of this.

There remains much speculation about the long-term impact of COVID on travel behaviour and bus use. It is reasonable to conclude that there will be some longer-term loss of patronage, especially related to lesser work-related travel associated in particular with flexible home working by larger numbers office-based staff, and perhaps, obliquely by business-related travel.

More positively, it is the case that the recovery of peak car use and traffic congestion has tended to lag traffic growth in general. How far this will translate into a longer-term easing of peak traffic pressure in the City and more broadly across the wide Gloucester Cheltenham and Tewkesbury Joint Core Strategy 2031 (JCS) area is very hard to say. For example, we already noticed that peak traffic delay tended to be lesser on Mondays and even more so on Fridays, especially on chronically-congested networks locally and more broadly. If home working choices preferentially gravitate to those days, as seems quite probable, pre-COVID car-borne travel behaviour will continue to prevail for most weekdays, and may even become aggravated if even a slight a permanent mode shift towards already-high car use has resulted from recent Government actions.

It is also very important to put these changes in a wider context. Within Gloucester City, the use of bus at peak to reach office-based employment is relatively low. This reflects both the economic structure of the City and also the

fact that a very large proportion of employers are based out-of-town. Even where high frequency bus services are available to these sites –as typically they are – bus connectivity is generally limited to a single main route.

Positively, the relevance of bus to our core customer base remains very high, indeed among the highest in the UK, based on the return of patronage we experienced by September 2020. Our average City boardings returned to about 75% of the comparable period in September 2019. The maintenance of home-working policies in local government, who are disproportionately represented in the town centre employment market, accounts for a considerable proportion of this. A large deficit was also apparent with concessionary travel, reflecting both its discretionary nature and the fact this demographic is disproportionately at risk of the epidemic. With the roll-out of vaccination and a gradual return of confidence we do expect these customers to start to venture out by bus again, to a rather greater extent. As a final comment, a great deal of our peak business is related to education flows, reflecting the provision of secondary and post 16 education in the City and JCS area, including grammar and denominational education, as well as wider parental choice. Without the largest number of learners using bus services, walking and cycling to reach education venues, it is clear that morning peak traffic demand would rise further.

Since the submission of the Plan, there have been further major shifts in Government policy, with more clearly signalled to follow.

As the crisis broke in March 2020, Government published a policy paper “Decarbonising Transport – Setting the Challenge” in which it was stated that sustainable modes – including public transport – need to become the natural first choice if the legally binding 2050 goal of national net-zero carbon is to be achieved in the transport sector. The contribution of transport to emissions continues to rise absolutely and relatively, uniquely among all sectors, and now equates to over 30% of the domestic footprint. It is notable that increasing car journey length and use has more than offset the increase in vehicle fuel efficiency over the last 20 years. It is also noteworthy that absolutely and relatively, the carbon impact of buses is reducing, almost uniquely among road modes. Substantial mode shift to bus is seen as being unavoidable if the national carbon target is to be achieved.

Government has also recently signalled its intent to refocus plan-making on carbon reduction, through it proposed redrafting of the “presumption in favour of sustainable development” set out at paragraph 14 of the National Planning Policy Framework (NPPF). While the Plan is being examined with regard to the current text, this is a sharpening up of an existing requirement, and the intent is clear. The City Council has itself adopted a resolution of “Climate Emergency” where it intends to secure a zero-carbon city as far as possible by 2030.

To a great and increasing extent, it ought to be expected that the Plan and its policy suite should be focused on achieving such a mode shift.

However, we do accept that the Council’s latitude in this regard is very significantly constrained, as we made plain in our previous representations. Gloucester City is a second- tier authority with no highways or transport powers of its own; and this is a Part 2 Plan sitting beneath the JCS as a Strategic Plan, containing the bulk of the strategic policy corpus. Furthermore and most importantly, the quantum of development proposed in the Plan is very modest: less than 1000 dwellings, or less than 100 additional dwellings per year. Finally with a plan horizon of 2031, leaving less than 9 years following adoption, it is extremely hard to imagine that substantial new transport schemes of strategic scope and impact could be identified and delivered within that period and to the degree that they will be, these are already accounted for.

## **2. Matter 10 : Delivery of Strategic Infrastructure**

***77. Is there appropriate certainty, and evidence that infrastructure provision will be provided at an appropriate quantum, in a timely fashion, and at appropriate suitably accessible locations, so as to support the delivery of the growth proposed within the GCP and the JCS?***

Stagecoach considers that the City Plan is now demonstrably able to mitigate the transport requirements that arise directly from it. The transport evidence base shows that stand-alone schemes are deliverable that sufficiently mitigate the growth that this Plan is providing for.

As far as strategic growth allocated in the JCS, within the City at Winneycroft and at the Strategic Allocations beyond the City boundaries, nothing we see in this plan physically prejudices or hinders the delivery of such schemes as are identified. Positively too, we see that there is fast-emerging clarity on local inter-modal hubs which respond to emerging GCC LTP Policy.

It is very hard for this plan, though, to make specific provision of safeguard land for strategic schemes that to date are not sufficiently defined to warrant safeguarding. For example, any grade separation of the A38 Cole Avenue/A38/b4008 junction – to the degree this is anticipated, or deliverable at all – depends on a scheme that we are far from aware exists with any level of engineering definition. As far as we are aware, it largely exists as coding within the Central Severn Vale SATURN model.

### **3. Matter 10 : Prioritisation of Affordable Housing over Infrastructure for developer funding**

***78. Should affordable housing be promoted ahead of other forms of infrastructure or policy requirements as referenced in paragraph 3.7.30 of the GCP?***

**As previously signalled we continue to have concerns over Policy G8.** Our duly-made representations still stand and need not be repeated.

### **4. Concluding Comments**

We trust that the foregoing is sufficiently clear and helpful to the Inspector as she continues her Examination of the Gloucester City Plan. Do not hesitate to contact the undersigned to discuss any of the matters we raise further, in the first instance.

Yours sincerely

**Nick Small**

Head of Strategic Development & the Built Environment