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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. Main Matter 7: The Transport Evidence Base

Q58. Are the proposed levels of development justified by appropriate transport evidence? Notwithstanding that the broad development strategy has been set within the JCS, are the transport policies and allocations contained within the GCP consistent with paragraphs 102- 107 of the Framework?

Following our introductory narrative, we do believe that the Council has advanced a suitable, proportionate and reasonably up-to-date evidence base in support of the plan, and that the Plan is sound in this respect. We rarely find ourselves in so happy a position.

The Council and its consultant clearly had little choice but to use the Central Severn Vale SATURN model that covers the City and the wider JCS area. Given the fact the model area includes the vast majority of trip demands, including those that are expressed across the City boundary, this also highlights the areas where strategic transport-related issues are encountered as far as congestion and delay are concerned. These are already well-known from the JCS modelling exercise.

The Transport Review methodology then takes a hierarchical approach and focuses its attention on particular junctions and links where issues are evident and anticipated, clearly isolating the impacts that are attributable to JCS and City Plan commitments, and then seeking to specify either interim mitigations in advance of larger projects related to strategic development strategies being brought forward, or, in the absence of these, supplemental mitigations. These are clearly set out, and their impacts tested. Examination of the work shows relatively little cause for concern, inasmuch as in all cases the outcome of schemes that have been designed is a meaningful improvement over the “do-nothing” and any deterioration over the baseline is relatively modest. The use of a VISSIM micro-simulation to evaluate these impacts is in our view both entirely appropriate and welcome.

That is not to say there are no problems today or likely to emerge in future. The A4301 Southgate Street Bristol Road/Trier Way/St Anns Way junction is already a cause for concern, as is the length of A38 Cole Avenue between St Barnabas (A4173 Stround Road) and the A38/A430 junction at Quedgeley, at which the JCS DS proposes a grade separation: a project for which there is no design and no funding.

However, these problems are strategic in nature and cause, and require a strategic solution set – including much more aggressive and concerted actions to secure a wider mode shift. But these properly fall to a review of the County’s Local Transport Plan and the Review of the JCS itself, along with aligned planning and transport mitigation strategies in adjoining Stroud and Forest of Dean Districts where these impinge on cross-boundary movement.

This Plan posts relatively little development – fewer than 1000 residential units and less than the non-strategic growth assumed in the JCS for the City. It is hardly surprising then, that the model outputs show relatively slight variances to the runs performed for the JCS. Not only that, but non-strategic development is quite broadly dispersed so there are no additional increases of traffic demands created at points on the network, which might be expected where there are large scale concentrations of new development, whether on a single strategic site or a number of sites closely associated with a link or junction.

We would also endorse the conclusions made in the Transport Review that the sites, all of which are urban in nature, are well-served by sustainable modes including bus services, walking and cycling. This would tend to support rather higher sustainable mode shares than peripheral greenfield development. It is very hard to see what interventions that this plan could realistically make to boost these further. None of the sites is large enough to justify or support major investments in developing sustainable transport infrastructure and services.

Rather, the scale and extent of such improvements needs to be network and corridor based – not just within the City but also across its boundaries into adjoining authorities, including Stroud and the Forest of Dean, as well as Tewkesbury within the JCS area. The relationship with strategic allocations within the JCS lying immediately north of the City boundary in Tewkesbury at Innsworth and Twigworth (A1) and South of Churchdown (A2) and just to the east of the City North of Brockworth (Perrybrook) (A) is especially important given these allocations are intended to meet needs arising in the City.

Such interventions clearly lie outwith the scope of this plan, and the City Council as Local Planning Authority to define.

“We are where we are”. In our judgment and as our original representations allude, this is a rather uncomfortable position for all stakeholders to be in, but it is far from a hopeless one. The position taken in the currently adopted JCS towards investment in sustainable transport in particular is exceptionally weakly defined. Improvements to the bus network were not defined at all, to achieve a mode shift towards public transport across the JCS area, as DS7

(and all the hypothetical packages) assume. There is now a good deal more clarity as to what this needs to involve, which should be taken forward through the LTP and JCS Review as we hope and urge that it will be.

It is especially regrettable that there is no bus equivalent of a Local Cycling and Walking Infrastructure Plan (LCWIP) which all Transport Authorities must produce. This might be nevertheless be resolved by the requirements of a National Bus Strategy for England which is imminently expected.

Irrespective, none of this can be laid at the door of the City Council as LPA.

We can only assure the Inspector that we are working in a strengthening ongoing partnership with the County Council, the JCS Authorities (including the City Council), and developers to both support the review of the JCS, and its transport evidence base, the implementation of the Strategic Allocations (including site-specific public transport mitigations) and to ensure that a refresh of the County Council's Local Transport Plan creates the right policy conditions and defines the kinds of projects that will support the mode shift to bus that both the JCS transport evidence assumes, and is now demanded by emerging national policy. This collaboration is regular, ongoing, consistent and meaningful, exactly as NPPF anticipate and requires. It is taking place across multiple for and across a multiplicity of schemes and proposals, as well as strategies.

This work also ties in Stroud District and the Forest of Dean to an extent that was never the case for the currently-adopted JCS. Stagecoach is itself deeply engaged with both the Stroud District and Forest of Dean Local Plan Reviews. The nature of the cross boundary challenges and opportunities for each is becoming clear. However this is a very separate set of strategic matters, that properly lies outside the scope of this Part 2 Plan, which must be in conformity with the adopted JCS, and cannot realistically anticipate or pre-suppose the outcome of either the JCS Review or the progression of local plans in adjoining districts.

Stagecoach remains clear that **the Submission City Plan takes as much responsibility for and ownership of transport outcomes, through the planning process, as it reasonably can**, given the statutory and organisational competencies available to it. We would go further- in many other situations where limited allocations are made, in a Part 2 Local Plan - we have seen other authorities take a much more passive approach to both a transport evidence base and transport-related interventions and policies. The willingness of Gloucester City Council to go as far as it has, and supplement the JCS evidence base and schemes with a clearly evidenced and documented rationale, certainly as far as highways is concerned, is as good as we typically see.

While we would obviously always like to see a clearer vision for and focus on improving the attractiveness and relevance of bus service, it is hard to see how this plan could effectively perform such a role in the absence of strategies and specific projects being defined in the Strategic Plan and LTP.

We therefore consider the development strategy in the Plan, the quantum of development identified and the transport strategies and policies in the Plan to accord with NPPF paragraphs 102-107, and therefore to be sound.

3. Main Matter 7: The Effectiveness of the Plan regarding transport

Q59. Do policies A1, G1, G3 and G4 provide the unambiguous approach to decision making, as set out in paragraph 16 d) of the Framework? Is it appropriate for a local plan policy to defer to other documents which have not been subject to independent examination, and to suggest that the Council is not the decision maker? Should parking standards be included within the GCP?

Our commentary above begs the answer to these questions.

While Stagecoach regrets that there is very little formal statutory basis for the content and rigour of Local Transport Plans, and even more that there is no formal process of independent scrutiny ever applicable to them, this is not new. This situation does not, unfortunately, empower the planning system as a whole, or any Local Planning Authority, to remedy it.

The LPA must of course seek the view of the Transport and Highways Authorities as statutory consultees on proposals as well as in plan-making, and we understand that setting that advice aside has been within the prerogative of the LPA since 1985. However this in and of itself does not clearly justify or mandate the LPA creating

a new separate set of transport policies and transport-related standards – such as on parking. While it might conceivably choose to do so, we would consider this a highly unusual move that would demand a very high level of evidence and a very compelling rationale, and no doubt could risk causing a significant and public divergence of view with the LTA/Highways Authorities, who are the competent bodies in law. We are not aware of an instance that this has taken place in the wider region.

We would conclude, on this point, that standards for off-highway parking have a very material impact on the operation of the adjoining public highways, should demand for parking become displaced onto the street. The history of the application of PPG3 and PPG13 between 2000 and 2010 showed that restrictive maximum parking standards only cause footways and bus routes to become blocked, and make conditions supporting the use of sustainable modes greatly more unattractive and hazardous. One only need look at Kingsway within Gloucester City's boundary, and Coopers Edge just beyond it in Tewkesbury Borough, to see this in reality.

It is worth pointing out that policy at a higher, national level is in the middle of substantial change. Government has commissioned the production of a new national Manual for Streets ("Manual for Streets 3") which will be formally owned and sponsored by government in the way MfS 2 has never been. This sits alongside a clear direction of travel for reforms to the planning system which are seeking to streamline the planning system, one of which is to radically reduce overlapping and conflicting standards and advice. What this will mean for technical standards like parking standards is not clear to us at this writing but it seems possible, if not likely, that there will be less scope for local prescription rather than more, in a number of technical areas. There is already some evidence in this, in respect of cycling infrastructure, in the promulgation of Local Transport Note 01/2020 in July 2020.

Stagecoach has previously indicated its **support for Policy G1** and we maintain that support, for the reasons set out in our prior representations.

Policies G3 and G4 did not elicit explicit comment from us as they relate to walking and cycling but while to some extent they say little specific they are permissive. It might serve better, though, to more specifically direct applicants and decisions takers to ensure that all relevant opportunities to make improvements to walking and cycling are properly identified and taken forward, whether to local links and/or through delivery of contributions towards elements of larger strategic schemes. If so, we would expect policy to take a similar stance towards public transport improvements.

Notwithstanding this, we consider the approach to policy set out in the Plan to be effective in most regards and **broadly sound**.

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