

Joint Core Strategy
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Dear Sir or Madam

Joint Core Strategy Review: Issues and Options Consultation

I am pleased to attach Railfuture's response to the above Consultation. It replies to those questions in the Consultation document which affect transport but I have omitted Questions 8,9 and 12-15 on which Railfuture has no view.

If anything requires clarification, please let me know.

Yours sincerely

Nigel Bray
Railfuture
Secretary, Severnside Branch

1. Do you consider that a comprehensive review of the plan is the correct approach for the JCS review ?

Yes, a comprehensive review is needed because the Plan needs to be based on linking new housing with sustainable transport as much as possible. There is a view that some site allocations in the past may have been influenced more by the willingness of landowners to sell than by the feasibility of serving the developments by public transport. The Consultation document makes no specific mention of railways, apart from a reference to Ashchurch station in para. 12.6. This is despite the dramatic growth in usage of the nine National Rail stations in the county over the past 20 years, ie from 2.2 million in 1997/98 to 5.7 million in 2017/18 according to the Office of Rail and Road. Footfall at the three stations in the Plan area is tabulated below.

ORR Estimates of Station Usage

Station	1997/98	2007/08	2017/18
Cheltenham	731,388	1,338,855	2,400,434
Gloucester	699,284	1,014,816	1,477,988
Ashchurch for Tewkesbury	30,814	58,212	101,238

The JCS is supposed to be strategic but it is unclear whether it has a strategy to make the best use of existing infrastructure and reduce the growth of road traffic. Greater access to the rail network, through additional stations and better connectivity with other modes, is likely to reduce the distances people have to drive to reach employment and education.

2. On the basis that the plan period needs to be extended, what do you think is a reasonable timeframe for the JCS to plan for and why ?

As adjacent authorities in South Worcestershire are planning towards 2041, it would make sense for the JCS to plan for a similar timescale. 2050 is too far ahead, because people's values and lifestyles may have changed significantly by then.

3. What are the strategic policy areas that you consider the JCS should cover ?

Housing, transport, social impacts and health should be covered because they are interlinked. For instance, new housing estates in rural or outer suburban locations are likely to generate a great deal of additional road traffic unless enhanced public transport is provided at the start, not years afterwards. The feasibility of serving a housing development by sustainable transport, rather than just the availability of land, ought to be the main criterion in site allocations. One problem with car-based housing and employment is that not everybody in a household may have a car. Young people and persons who have had to give up driving may find themselves isolated from education, entertainment or work if there is no suitable public transport.

It is the policy of the Gloucestershire Local Transport Plan 3 (LTP3) to reduce car dependence. Inactive lifestyles encouraged by total reliance on car transport are likely to increase the risk of obesity, Type 2 diabetes and heart disease, with cost implications for the health service. On 4 January the *Western Daily Press* reported guidelines issued by the National Institute for Health and Clinical Excellence (NICE), calling for pedestrians, cyclists and public transport users to be given priority over

motorists in town planning.

4. Do you consider any alterations to the existing policies in the adopted JCS are required, particularly in the light of the revised NPPF ?

As NPPF (2018), para. 104, encourages the safeguarding of disused railway formations, the JCS needs an amendment to protect those sections of the Cheltenham- Honeybourne line which have yet to be relaid. We consider that this part of NPPF should also apply to possible sites for new stations on existing lines, eg at Churchdown, which could also serve Gloucestershire Airport.

5. What is the duty to cooperate issues that the JCS review will need to consider ?

As transport infrastructure extends beyond the boundaries of the JCS, future extension of the Gloucestershire Warwickshire Steam Railway to link with the Worcester-London main line at Honeybourne will require cooperation with Worcestershire County and Wychavon District Council. Reopening of the line as a through route to Stratford is highly desirable and would require cooperation with Stratford District and Warwickshire County Councils.

New infrastructure on the border or outside the Plan area may increase journey opportunities to and from the Plan area. For instance, the station proposed at Hunt's Grove, south of Gloucester, is on the border of the city and the Stroud District. It would be well placed to serve housing suggested in para. 12.14 of the Consultation document. Maximising its potential would need cooperation between both authorities. The Worcestershire Parkway station now under construction will improve connectivity between stations in the Plan area and the North Cotswold line (Oxford-Worcester).

6. Are the vision, key challenges and objectives identified in the JCS still relevant ? Are there new key challenges the JCS review needs to consider ?

Where transport is concerned, the direction of the vision as described in the Consultation document is unclear. It mentions both roads and public transport without any clarity on policy and is therefore open to different interpretations. Is the emphasis to be on road building to cater for increased motor traffic ? Does the reference to public transport envisage modal shift away from cars or is it merely to maintain the status quo in terms of rail and bus services ?

Railfuture believes that the increased popularity of rail travel and enhancements to infrastructure such as the Gloucester Transport Hub should be a starting point for reducing car dependence and increasing access to jobs, education and leisure by sustainable means as far as practicable.

We would not disagree with the key challenges but there needs to be a specific commitment to promoting active travel, with a view to improving health outcomes as outlined by NICE (see our response to Question 2) and which aligns with Objective 8 (Promoting healthy communities). Most public transport journeys involve an element of walking, whereas car travel is likely to reinforce inactive lifestyles.

7. Having regard to spatial strategy and the options presented above, how do you think the JCS authorities can most sustainably deliver for our future development needs ?

Our preference is for new housing developments to be in urban areas or urban extensions, which are easiest to serve by sustainable transport. The proposed railway station at Hunt's Grove, on the border of Gloucester City and Stroud District, would be well placed for additional housing at Kingsway and Quedgeley. The location of Cheltenham station in the south west of the town would support urban extension towards the west, as proposed in para. 12.8. Many Cheltonians already commute by train to Gloucester and there is plenty of capacity on the 07.30 and 08.30 Cheltenham- Paddington trains to accommodate more commuters into Gloucester.

Ashchurch station needs an hourly service in order to meet its potential to serve Tewkesbury and district. In particular it needs a train between 07.05 and 09.24 in the Gloucester direction to suit normal office hours in Cheltenham and Gloucester.

Encouragement of sustainable transport requires better integration between modes and more visible information about current rail and bus services. Railway stations need adequate car parks. We welcome the recent creation of 240 additional spaces at Gloucester station and its second entrance on Platform 4. Revenues from these and municipal car parks could be used if necessary to subsidise feeder buses from outlying areas to railway stations.

Gloucester Transport Hub (the new bus station) needs to display live train information, as does Worcester bus station for trains at Foregate Street station. Likewise Gloucester railway station should display times of imminent bus departures from the Hub, as do Bristol Parkway, Bristol Temple Meads and Reading stations for nearby bus stops.

10. What types of employment land do you think are required in the JCS area to provide for the needs of different business sectors and where would it best be located ?

New large industrial estates should be sited as close as possible to railways, to allow the factories to be rail served if necessary at a later date. Business parks should have regular bus services to reduce car commuting. Office employment is best located in town and city centres or at least on a regular bus route. Many of Gloucester's largest offices and retailers are within walking distance of the railway station.

11. How can the JCS best plan for the changing nature of city and town centres to ensure they remain vital and viable in the future ?

The JCS should discourage out-of-town retail parks, which are more difficult to serve by public transport. City and town centres need to provide a variety of outlets for eating, entertainment and shopping. In Gloucester the Kings Square redevelopment offers an opportunity to remove some hideous buildings which give a bad impression to visitors arriving by train or bus. There are probably too many coffee houses and fast food outlets in both Cheltenham and Gloucester. More encouragement of small independent businesses is desirable.