

31st March 2020

Orlagh Stoner
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By email only to ltp@gloucestershire.gov.uk

Dear Ms Stoner

Gloucestershire Local Transport Plan (LTP) Review - Public Consultation

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the Gloucestershire Local Transport Plan (LTP) Review.

The Board supports many of the aspirations of the draft LTP. We recognise that the proposed measures and policies set out in the LTP will help to achieve the proposed vision and objectives. However, we have a number of recommendations that we hope will further enhance the LTP.

At a strategic level, the Board recommends that the LTP vision should more explicitly address social and environmental issues, in addition to focussing on sustainable economic growth, in order to ensure that the LTP helps to deliver truly sustainable development. In particular, the Board recommends that the vision should explicitly address the issue of mitigating and adapting to the impacts of climate change. We also recommend that there should be a stand-alone objective relating to climate change mitigation and adaptation.

A large proportion of Gloucestershire lies within the Cotswolds Area of Outstanding Natural Beauty (AONB), with a smaller proportion also lying within the Wye Valley and Malvern Hills AONBs. The AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safe guard them. Given the national importance of the AONBs, the Board recommends that the LTP should make more explicit reference to the AONBs at the outcome, policy and policy proposal level. In particular, the Board recommends that the LTP should have regard to – and help to deliver – the purposes of:

- conserving and enhancing the natural beauty of the AONBs;
- increasing the understanding and enjoyment of the AONBs' special qualities.

With regards to the Connecting Places Strategies (CPS), the Board recommends that the North Cotswolds CPS should address the issue of HGV movements associated with the cluster of quarries between Naunton and Toddington, in the Cotswolds AONB. The Board also recommends that proposals for the A46 expressway, referred to in the Tewkesbury CPS, should have regard to the purpose of AONB designation, given the close proximity of the expressway to the AONB.

Further information regarding the Board's consultation response is provided in Annex 1 and 2.

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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Yours sincerely,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

John Mills MRTPI
Planning and Landscape Officer

ANNEX 1. SUPPORTING INFORMATION FOR THE RESPONSE OF THE COTSWOLDS CONSERVATION BOARD TO CONSULTATION ON THE GLOUCESTERSHIRE LOCAL TRANSPORT PLAN

2. OVERARCHING STRATEGY

QUESTION 2.1: Do you have any comments to make on the revised LTP vision, objectives and expected outcomes?

2.1.1 Vision (Shaping the Way to 2041 - para 2.1, page 4 (page 9 of digital version) & Overarching Strategy – para 1.5, page 6 (page 47 of digital copy)):

Vision:

- A resilient transport network that enables sustainable economic growth by providing door to door travel choices for all, making Gloucestershire a better place to live, work and visit.

Comments:

The Board recognises the need for a resilient transport network that enables sustainable economic growth, provides door to door travel choices for all and makes Gloucestershire a better place to live, work and visit.

However, the Board is concerned that the vision primarily focusses on economic growth. Whilst sustainable economic growth can play an important role in enabling sustainable development, sustainable development requires this economic growth to be pursued in mutually supportive ways with relevant social objectives and environmental objectives. The vision should, therefore, more explicitly address social and environmental aspirations as well as economic aspirations.

The Board acknowledges that these wider aspirations are addressed, to some degree, in the LTP objectives. However, the objectives should flow directly from the vision. So, for example, the environmental objectives should have a 'hook' in the vision that these environmental objectives relate to.

In particular, the vision should explicitly address the 'climate emergency' and the need to mitigate and adapt to the impacts of climate change.

This is a crucially important issue. The vision sets the tone for the whole LTP and for transport provision in Gloucestershire for the next twenty years. If the vision does not explicitly or adequately address environmental and social aspirations, then it is likely that the LTP and transport provision in Gloucestershire will also fail to adequately address these aspirations.

2.1.2 Objectives (Overarching Strategy - para 1.8, page 7 (page 48 of digital copy))

Objectives:

- Protect and enhance the natural and built environment
- Support sustainable economic growth
- Enable safe and affordable community connectivity
- Improve community health and wellbeing and promote equality of opportunity

The Board supports these objectives. However, as with the vision, the objectives should also explicitly address the 'climate emergency' and the need to mitigate and adapt to the impacts of climate change. In later sections of the LTP, this issues appears to have been addressed under the objective of 'protect and enhance the natural and built environment'. However, the issue of climate change is much more over-arching and, as such, should be addressed as an objective in its own right.

2.1.3 Outcomes

Protect and enhance the natural environment

The Board supports the 'expected outcomes' for this objective.

However, as outlined above, mitigating and adapting to the impacts of climate change should be a separate objective. As a separate objective, there should then be multiple outcomes relating to that objective, not just 'reduced transport derived carbon emissions'. For example, one of the outcomes relating to this new climate change objective could be 'a comprehensive network of electric vehicle charging points across the county'.

The outcome relating to car use should be 'a reduction in car use', not just 'a reduction in solo car use'. Reduction in solo car use is one of the means of achieving overall reduction in car use.

Given that a large proportion of the county lies within the Cotswolds Area of Outstanding Natural Beauty (AONB) – and a smaller proportion in the Wye Valley and Malvern Hills AONBs - there should be an outcome specifically for transport provision being delivered in a way that helps to:

- (i) conserve and enhance the natural beauty of the AONBs;
- (ii) increase the understanding and enjoyment of the AONBs' special qualities.

Support sustainable economic growth

The outcome of 'a transport network resilient to extreme weather events' should be included in a stand-alone outcome that specifically addresses climate change mitigation and adaptation.

The outcome relating to a thriving tourist industry should state 'a thriving tourist industry which benefits from an integrated transport system that provides ease of car-free access to the country's natural, built and historic environmental asset'.

Enable safe and affordable community connectivity

The Board supports the proposed outcomes, particularly:

- Reduced risk of social isolation.
- An integrated transport network which provides genuine transport choices.

Improve community health and wellbeing and promote equality of opportunity

The Board supports the proposed outcomes.

The outcome relating to 'access to services' should emphasise car-free access.

QUESTION 2.2: Do you have any comments on the revised over-arching policies?

LTP PD 0.1 – Reducing transport carbon emissions and adapting to climate change.

The Board supports the policy and the policy proposals.

However, although the revised policy title now refers to ‘adapting to climate change’, the policy itself and the policy proposals say very little about this.

Adaption measures could include:

- providing green infrastructure;
- ensuring that road corridors act as ecological networks, for example, by ensuring that road verges are pro-actively managed to provide ‘bee-friendly’ plants;
- ensuring that storm run-off from roads is managed through the use of sustainable drainage systems.

If these issues are addressed in other policies, then Policy LTP PD 0.1 should at least cross-reference with these other, related policies.

With regards to mitigation, the policy should include reducing the need to travel and the policy proposals should include the promotion of home-working and meetings being held via Skype, Zoom and / or other forms or remote video conferencing.

LTP PD 0.2 – Local Environmental Protection

The Board supports the aspirations of this policy and the policy proposals.

Cotswolds AONB

As outlined above, a large proportion of the county lies within the Cotswolds Area of Outstanding Natural Beauty (AONB) – and a smaller proportion in the Wye Valley AONB. These are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation’s interest to safeguard them. The statutory purpose of AONB designation is to conserve and enhance the natural beauty of the AONB. Local authorities and other public bodies and statutory undertakers have a statutory duty to have regard to the purpose of AONB designation. Local authorities also have the statutory power to take all such action as appears expedient for the accomplishment of this purpose.

Furthermore, the Board has a second duty to increase the understanding and enjoyment of the AONB’s special qualities. These two purposes form the basis of the Cotswolds AONB Management Plan, with all relevant stakeholders being expected to play their part in delivering the vision, outcomes and policies of the Management Plan.

With these points in mind, the Board recommends that there should be an outcome specifically for transport planning and provision being delivered in a way that helps to:

- (iii) conserve and enhance the natural beauty of the AONB;
- (iv) increase the understanding and enjoyment of the AONB’s special qualities.

At a policy level, this should specify that transport provision will be delivered in a way that is consistent with the policies of the Cotswolds AONB Management Plan¹ and other relevant guidance published by the Board, including:

- Cotswolds AONB Landscape Character Assessment;²
- Cotswolds AONB Landscape Strategy and Guidelines;³
- Cotswolds AONB Local Distinctiveness and Landscape Change;⁴
- Cotswolds Conservation Board Position Statements, in particular, those relating to transport, roadside verges, tranquillity and dark skies.⁵

The Cotswolds AONB Landscape Strategy and Guidelines (LSG) identifies a number of 'local forces for change' in each of the 19 landscape character types in the Cotswolds AONB. These local forces for change include:

- Road upgrading and improvements, especially of minor country roads, as a result of development or improvement schemes.
- Excessive traffic and / or speed on minor local roads and lanes.
- Increase in size of vehicles using lanes.

For each of these local forces for change, the LSG identifies 'potential landscape implications' and provides relevant guidelines. These are summarised in Annex 2.

Therefore, the Board recommends that the LTP should seek to avoid the potential landscape implications outlined in the LSG and should be consistent with the LSG guidelines.

The Board's Tranquillity Position Statement makes a number of recommendations that are specifically relevant to transport. Tranquillity is one of the special qualities of the AONB. In other words, it is one of the features that makes the AONB so outstanding that it is in the national interest to safeguard it.

The Position Statement highlights that developments, both inside and outside the AONB, that would increase travel flows (or HGV movements) on individual roads in the AONB by 10% or more, would be a 'trigger of concern' and potentially require an Environmental Impact Assessment (EIA). Within the AONB such development should be considered to be major development, in the context of paragraph 172 and footnote 55 of the National Planning Policy Framework.

Therefore, the Board recommends that there should be a presumption against granting planning permission for development that would increase traffic flows (or HGV movements) on roads in the AONB (or along its boundary) by 10% or more.

The Position Statement also addresses the issue of noise of the road network in and adjacent to the Cotswolds AONB. One of the key issues is the 'important areas' where there are particularly high levels of road noise in close proximity to residential properties.

¹ [Cotswolds AONB Management Plan 2018-2023](#): Policies CC1 (Developing a Consistent, Coordinated and Landscape-led Approach Across the Cotswolds AONB), CC7 (Climate Change – Mitigation), CC8 (Climate Change – Adaptation), CE10 (Development and Transport) and UE1 (Sustainable Tourism) are particularly relevant. However, the policies of the AONB Management Plan should be considered as a whole.

² <https://www.cotswoldsaonb.org.uk/our-landscape/landscape-character-assessment/>

³ <https://www.cotswoldsaonb.org.uk/our-landscape/landscape-strategy-guidelines/>

⁴ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/11/CCB-Local-Distinctiveness-and-Landscape-Change-report-ldr-09.pdf>

⁵ <https://www.cotswoldsaonb.org.uk/our-landscape/position-statements-2/>

Given that tranquillity is one of the special qualities of the AONB, the Board recommends that the AONB should be a priority area for measures to reduce noise levels on the road network both in 'important areas' and at key locations such as along the Cotswold Way and popular visitor destinations in the AONB. Reductions in speed limits should also be considered at particularly sensitive locations.

Tranquillity also relates to the issue of visual clutter. A key consideration of the LTP should, therefore, be the issue of visual clutter (for example, multiple road signs in close vicinity to each other) along roads in the AONB and how this can be reduced.

Biodiversity net-gain

The policy refers to improving biodiversity net-gain. The issue of net-gain should not be the main focus for biodiversity at the policy level. Net-gain is a mechanism whereby the loss of any biodiversity is compensated for by providing more biodiversity post-development. In line with the mitigation hierarchy the top priority should be to avoid biodiversity losses and then to minimise biodiversity losses. The over-arching objective should be to significantly enhance biodiversity. This should be delivered in line with the Lawton Principles of 'bigger', 'better', 'more' and 'connected', as outlined in Policy CE7 (Biodiversity) of the Cotswolds AONB Management Plan 2018-2023.

Policy LTP PD 0.4 - Integration with land use planning and new development

The Board supports this policy and these policy proposals, particularly the principle of locating new development in locations that have multi-modal transport opportunities, including public transport, walking and cycling.

Ideally, these multi-modal transport opportunities should include realistic opportunities to use public transport for commuting to and from work on a daily basis and accessing services on at least a weekly basis.

Policy LTP PD 0.5 – Community health and wellbeing

The Board supports this policy and these policy proposals.

The policy should also include a policy proposal to facilitate easy access for communities from urban areas (especially 'hard to reach' groups or communities in deprived neighbourhoods) into the surrounding countryside, including into the Cotswolds AONB.

Policy LTP PD 0.6 – Thinktravel influencing travel behaviour

The Board supports the aspirations of this policy and these policy proposals.

As well as promoting the use of sustainable modes of transport, the policy should also promote a reduction in the need to travel, for example, by encouraging home working and 'virtual' meetings (for example, video conferencing via Skype, Zoom, etc.).

Policy LTP PD 1.1 – Gloucestershire's bus network / Policy LTP PD1.6 – Transport Interchange Hubs / LTP PD 5.1 = Rail infrastructure improvements

The Cotswolds AONB is a popular visitor destination with over 20 million visitor per year. However, the AONB spreads across 15 different local authorities (including seven county or unitary authorities). In order to ensure that visitors to the Cotswold travel sustainably, it is vitally important to ensure that there is good coordination between public transport provision

between these different local authority areas within and into / out of the AONB, particularly from key transport hubs such as railway stations.

Therefore, one of the policy proposals should be to ensure good coordination of public transport provision across and into / out of the Cotswolds AONB.

Policy LTP PD 3.1 – Gloucestershire’s freight network

The Board supports the aspirations of this policy and these policy proposals.

The policy and policy proposals should also seek to increase the proportion of freight that is move via rail (and via water), in order to alleviate levels of freight movement on roads, particularly in sensitive locations such as the Cotswolds AONB.

Policy LTP PD 3.4 – Driving Better Practice

The Board supports the aspirations of this policy and these policy proposals.

As well as targeting the construction and logistics industries, the policy should also target the minerals industry. For example, the speed and which ‘quarry lorries’ drive down narrow rural lanes and rural villages is a key concern of local residents in the Cotswolds AONB, particularly in the north west of the AONB between Naunton and Toddington. The Board has provided further comments on this issue in relation to the Connecting Places Strategy for the North Cotswolds.

Policy LTP PD 6.2 - Rights of Way

The Board supports the aspirations of this policy and these policy proposals.

However, the Board recommends that the policy proposals should make explicit reference to the Cotswold Way National Trail (and the other National Trails within the county) as being a top priority, including the provision of improved crossings where the National Trails cross the main road network.

4. CONNECTING PLACES STRATEGIES

QUESTION 4.1: Do you have any comments on the strategic vision outlined in the following areas?

- **CPS1 – Central Severn Vale**
- **CPS2 – Forest of Dean**
- **CPS3 – North Cotswolds**
- **CPS4 - South Cotswolds**
- **CPS5 - Stroud**
- **CPS6 - Tewkesbury**

CPS3 – North Cotswolds

The Board acknowledges the issues and opportunities identified for this CPS. In particular, we acknowledge the strategic vision to resolve the capacity and accessibility constraints on the A429. We also acknowledge the local scheme priorities.

The need to establish a traffic management area for the cluster of quarries between Naunton and Toddington

The Board would like to flag up another significant issue in this CPS that should be addressed in the LTP. This is the issue of HGV movements associated with the cluster of eight quarries between Naunton and Toddington in the Cotswolds AONB.

Whilst there are other quarries located elsewhere in the Cotswolds AONB, this cluster is unique in that there are so many quarries in close proximity to each other, all on relatively minor roads that pass through small villages (primarily the historic Buckle Street and the B4077 and Ford and Toddington, respectively).

Mineral production at these quarries has increased significantly across this cluster in recent years, leading to an increase in associated HGV movements. A number of the quarries are seeking to remove or amend planning conditions that restrict HGV movements and / or output, to allow for more (flexibility on) HGV movements. One quarry has recently re-opened.

From a local community perspective, in addition to the issue of the number of HGV movements, key issues also include the speed at which the HGVs are driven through these villages and along the minor roads (some sections of which are single lane roads with passing places) and the time of day that the HGVs drive through (i.e. outside of quarry operating hours).

One of the key issues relating to this cluster of quarries is the lack of a robust baseline of HGV movements in the area. This makes it very difficult to reliably and accurately assess if proposals relating to these quarries would significantly increase HGV movements (for example, by increase HGV movements on local roads by 10% or more, as outlined in the Board's Tranquillity Position Statement). This is exacerbated by the fact at least one of the quarries had been known to exceed its permitted output / HGV movements and then based its assessment of HGV movements on this inflated baseline. This issue is further exacerbated by the fact that some of the quarries have old permissions that do not include conditions restricting HGV movements and by the fact that the quarry output and number of HGV movements varies seasonally.

Whilst some planning decisions relating to these quarries have put the onus on the applicants to prove that their proposals *would not* significantly increase the number of HGV movements on local roads, other planning decisions have put the onus on the County Council, the Board and / or other stakeholders to prove that the proposals *would* significantly increase the number of HGV movements.

The Board has worked positively and pro-actively to bring relevant stakeholders together to discuss how these issues (and other related issues) might be addressed across this cluster of quarries. For example, the Board organised and co-facilitated a stakeholder workshop in January 2020, which brought together over 40 representatives from the quarry operators, parish councils, local authorities and the Board. From this workshop, it was clear that there was a desire, across these different groups, to address these issues. A report on this stakeholder workshop is attached to this consultation response.

Following on from this workshop, key stakeholders have agreed to establish a steering group to progress actions to address these issue. However, the current Coronavirus lockdown has limited the scope for convening this steering group in the near future.

The Board considers that the LTP can play a key role in helping to address these issues. We recommend that the LTP should:

- identify this quarry cluster – and the associated HGV movements - as a strategic priority for this CPS;
- establish a traffic management area across this cluster area;
- prioritise funding for monitoring HGV movements in this area (particularly on Buckle Street and the B4077 and through Ford and Toddington) to establish a robust baseline, based on a scenario in which the operators are complying with their planning conditions - ideally this monitoring should be undertaken over a twelve month period to identify seasonal variance;
- from this monitoring, establish a robust baseline of HGV movements that can be used by all relevant stakeholders when assessing the potential increase in HGV movements on local roads associated with quarry proposals;
- set and enforce reduced speed limits for HGVs through the affected villages and on the local roads;
- set and enforce times within which HGVs are permitted into the cluster area (for example, no earlier than, say, 30 minutes before quarry opening times and no later than, say, 30 minutes after quarry closing times).

CPS4 – South Cotswolds

The Board acknowledges the issues and opportunities identified for this CPS. In particular, we acknowledge that the A417 Missing Link remains the key strategic vision for this CPS. The Board recognises the need for a Missing Link scheme and we are working pro-actively with Highways England and other key stakeholders to ensure that the scheme delivers the agreed landscape-led vision, design principles and objectives. We also acknowledge the local scheme priorities.

CPS5 - Stroud

The Board acknowledges the issues and opportunities, strategic vision and local scheme priorities identified for this CPS.

CPS6 - Tewkesbury

The Board acknowledges the issues and opportunities, strategic vision and local scheme priorities identified for this CPS. In particular, we recognise the strategic vision to resolve the severe capacity and congestion constraints along the A46 corridor and improve the safety of the M5 Junction 9.

The proposed A46 expressway would be located close to the boundary of the Cotswolds AONB and would be clearly visible from public rights of way on the Cotswold escarpment outlier of Oxenton and Dixton Hills. The government’s Planning Practice Guidance (PPG):

- *Land within the setting of these areas [i.e. AONBs] often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.*⁶

The Board therefore requests that the PPG is taken into consideration - and that Gloucestershire County Council and other relevant stakeholders fulfil their statutory duty to

⁶ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 042.

have regard to the purpose of AONB designation – from the earliest stages of the expressway proposal. This should include having regard to the policies of the Cotswolds AONB Management Plan 2018-2023 and guidance published by the Board, including the Cotswolds AONB Landscape Strategy and Guidelines.

LTP SCHEME APPRAISAL

The Board acknowledges the ISA objectives identified in Figure C (Stage 1 – LTP Scheme Appraisal). However, given the national importance of the AONB designation, as outlined above, the Board recommends that the ISA objective relating to landscapes should be changed to:

- *Protect and enhance the character and quality of the landscapes, townscapes and visual amenity, with great weight being given to conserving and enhancing the natural beauty of the Cotswolds, Wye Valley and Malvern Hills AONBs.*

ANNEX 2. Relevant extracts from the Cotswolds AONB Landscape Strategy and Guidelines⁷

Local Forces for Change	Potential Landscape Implications	Landscape Strategies and Guidelines
Road upgrading and improvements, especially of minor country roads, as a result of development or general improvement schemes	<ul style="list-style-type: none"> • Introduction of suburban features such as mini roundabouts, lighting, kerbs and traffic calming measures. • Use of inappropriate materials (e.g. standard highway fences and barriers). • Increased traffic movement. • Loss of roadside hedges and walls. • Loss of verge/roadside habitat. 	<ul style="list-style-type: none"> • Refer to DMRB Vol 10 for general environmental design guidance. • Conserve the rural character of the local road network. • Resist the construction of ‘village gateways’, particularly those which are inappropriate and out of character. • Minimise the use of road markings, permanent signage and lighting, siting them with care and ensuring that they are in keeping with their surroundings wherever possible whilst fulfilling road safety requirements. • Avoid making over-large and inappropriate entrances and keep visibility splays to a minimum. • Promote use of design and materials appropriate to local character. • Produce guidance on design and suitable materials. • Promote use of ‘shared space’ for traffic calming measures in villages. • Seek opportunities to conserve and enhance roadside boundaries and habitats and secure their long-term management.
Excessive traffic and/or speed on minor local roads and lanes. Increase in size of vehicle using lanes.	<ul style="list-style-type: none"> • Pressure to improve roads by widening and straightening. • Loss of tranquillity and danger to walkers/riders and other nonmotorised users. • Damage to verges and roadside boundaries by HGVs and agricultural vehicles. 	<ul style="list-style-type: none"> • Promote traffic restriction measures such as lorry routing maps, speed limits and weight restrictions. • Maintain or reinstate rural character within towns and villages by promoting shared space and road design to slow and minimise traffic impact. • Apply national guidance on rural speed restrictions in sensitive areas (DfT Circular 01/2013 especially Para 128). • Ensure traffic management measures reflect the character and materials of the area. • Encourage use of public transport, car sharing etc. • Promote quiet lane initiatives. • Encourage cycling on safe routes. • Promote road verge protection and management

⁷ <https://www.cotswoldsaonb.org.uk/our-landscape/landscape-strategy-guidelines/>