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For the attention of Orlagh Stoner

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Dear Madam

Local Transport Plan 4 Review Consultation

I am pleased to attach Railfuture's response to the above Consultation.

We have commented on the Connecting Places, Freight and Rail Strategies. In each case our paragraph numbers correspond with those in the respective Strategies. We have used italics when quoting sentences directly from the Strategies.

If anything in this response requires clarification, please let me know.

Yours sincerely

Nigel Bray

Nigel Bray
Railfuture
Secretary, Severnside Branch.

Connecting Places Strategy

CPS1 Central Severn Vale, Specific Revenue Projects, page 32

In principle we support the rail proposals in Table 3d but would prefer them to be developed by a Task Force including stakeholders, rather than by commissioning consultants. Incidentally, “West of England Partnership” should read “West of England Combined Authority.”

CPS2 Forest of Dean, Issues and Opportunities, page 39

The heavy peak congestion on the A40 and the limited public transport access into Gloucester and Cheltenham make a case for an additional station between Lydney and Gloucester, which we discuss in our comments on the Rail Strategy.

CPS3 North Cotswolds

5.1.6 The new Worcestershire Parkway station increases sustainable travel opportunities from Moreton-in-Marsh through interchange between the North Cotswold Line and trains to Birmingham, Cheltenham, Gloucester and many other places.

5.1.7 We welcome the suggestion for Moreton station to become a sustainable transport hub for the North Cotswolds.

5.3.1 If the Council is serious about addressing climate change and developing sustainable transport, it should promote future connections from the North Cotswold Line to East West Rail as the route to the Oxford-Cambridge arc, rather than via trunk roads.

5.3.2 We welcome the intention to maximise the potential of Moreton station by developing its potential for onward sustainable travel.

CPS4 South Cotswolds

6.1.8 We agree there is “*potential for improved local and cross border public transport, via bus and/or rail from Cirencester and Kemble.*” This is why we support the proposed Cirencester Community Railway, which would not only improve connectivity between Cirencester, the Royal Agricultural University and the rest of the UK but would probably become a tourist attraction in itself.

CPS5 Stroud, Issues and Opportunities, page 70

Inadequate rail services to Bristol mean that the two campuses of Stroud & South Gloucestershire College are not well connected.

The stated opportunity to “*maximise public transport along the A38 Corridor linking the district to....Gloucester and Bristol*” requires investment in rail services with stations including Stonehouse Bristol Road. “*A new station north of Stonehouse*” (presumably Hunts Grove) would require road travel in the wrong direction for journeys between Stonehouse / Stroud and the Bristol area. Nor would it be an attractive proposition for workers at the industrial estates alongside the site of Bristol Road station. The additional time required to access Hunts Grove or Cam & Dursley stations instead of Stonehouse Bristol Road is likely to defeat the object of reducing car journeys on the A38 Corridor.

7.3.3 The opportunity for a half-hourly MetroWest service between Gloucester and Bristol will be wasted without a station directly serving the Stroud / Stonehouse urban area, Stonehouse Business Park and the Cotswold Canals.

Table 7a, page 73.

We are not convinced that new dynamic loops are needed to segregate faster and slower trains between Gloucester and Bristol. Long loops already exist at Haresfield and Charfield.

CPS6 Tewkesbury, Strategic Vision

8.3.2 We support the proposal to make Ashchurch for Tewkesbury station a multi-modal hub, with increased train service frequencies.

Freight Strategy

8.0 Rail and Water Freight

8.1.2 It is most important that existing sidings at Gloucester Yard and Lydney are safeguarded for possible future use.

8.1.3 We understand that MoD will remain at Ashchurch for another 10 years, so there would not appear to be an immediate threat to the rail freight depot. If it were to close eventually, we would expect the Council to secure an alternative location.

8.1.5 Land needs to be safeguarded at Cheltenham and Gloucester stations for the development of light parcel hubs. GWR already conveys urgent parcels including fresh food on behalf of InterCity Freight Services Ltd.

8.1.7 The bulk cargoes handled at Sharpness Docks would appear to be suitable for rail. The branch line is protected for future use under Policy PD5.1 in the Rail Strategy. The sidings at Sharpness (or at least their formation) also need to be protected.

Rail Strategy

1.0 Introduction

1.1.5 Although the Council may consider its role in future rail investment decisions to be limited, it is entitled to apply to the Government's New Stations Fund to obtain a substantial proportion of the cost of new stations when such projects become "shovel ready."

We agree that the value of rail for managing shorter distance trips should not be overlooked. Lydney-Gloucester is a good example, because Lydney station has experienced a remarkable growth in usage in recent years (see our updated Table D). "*Short distance*" in this case is 19 ½ miles (31 km), so there is a very strong case for additional stations within a similar range of Gloucester and Cheltenham. Many Cheltenham residents commute to Gloucester by train because this is much quicker than by road in the peak.

1.1.6 The existing rail network in the county does not deliver efficient connectivity between the Stroud / Stonehouse urban area (Gloucestershire's third largest) and the Greater Bristol conurbation, for lack of a suitable station. We reject the proposition in the 2015 Rail Study Report that Stroud area residents could drive to Cam & Dursley station. Its car park is normally full by 08.00 and in any case such advice flies in the face of encouraging sustainable non-car access to stations. Nor is a rail journey from Stroud or Stonehouse to Bristol via Gloucester or Swindon an "*attractive travel choice*" in the words of the connectivity objectives listed in Table B. At present it takes longer to travel by train from Stonehouse or Stroud to Bristol than to London, which is three and a half times the distance.

Reopening Stonehouse Bristol Road station would not only provide connectivity with Bristol but also encourage people from the Bristol area to visit the Stroudwater Canal, which is close to the station site, without needing a car. One of the largest concentrations of modern industry is also alongside the former station site.

Another untapped market for rail is from the eastern Forest of Dean to Gloucester and beyond. There is peak hour congestion on the A40 and A48 into Gloucester which could be relieved by a station in the Elton Corner/Westbury-on-Severn area, using existing Transport for Wales services. Such a station would be convenient for Cinderford, Drybrook, Newnham and Ruspidge. Lydney station is too far west to be an acceptable railhead for these flows.

1.1.8 Public transport trips, particularly by rail, usually involve an element of walking. We would therefore add to the community health and wellbeing objectives, "reduction in inactive lifestyles caused by car dependence."

2.0 Summary of evidence base

2.3 It is not necessary for passengers from Gloucester to Bristol and points west to travel via Cheltenham. It can be an advantage to do so in the opposite direction because of the spacing of the hourly GWR stopping trains and Cross Country (XC) services at Bristol Temple Meads. If MetroWest is extended to Gloucester, with a half-hourly service, any advantage from changing at Cheltenham for journeys from Bristol and points west may well disappear.

The pressure on car parking at Cam & Dursley and Kemble is all the more reason

to improve public transport links to these stations, including in Kemble’s case the proposed Cirencester Community Railway. As a high proportion of Cam & Dursley passengers are believed to live in the Stroud area, this strengthens the case for Stonehouse Bristol Road.

2.4 Although outside the county, the new Worcestershire Parkway station may well generate rail journeys from Gloucestershire stations by creating regular connections between Gloucester, Cheltenham and stations on the North Cotswold line. It is a viable railway junction, not just a motorists’ railhead.

We have taken the liberty of updating Table D Station Usage with the latest figures from the Office of Rail and Road. The Rail Strategy uses 2014/15 as the baseline and 2017/18 as the comparison but in doing so masked very large long term growth, particularly at Cam & Dursley and Lydney. We have therefore used 2004/05 as our baseline (as did the 2017 Draft Rail Strategy).

Station	2004/05	2018/19	% Change
Cheltenham	1,036,744	2,485,720	140
Gloucester	809,913	1,551,632	92
Stroud	268,102	561,892	109
Kemble	223,066	387,798	74
Moreton-in-Marsh	180,458	273,018	51
Cam & Dursley	64,355	191,426	197
Lydney	71,378	243,896	242
Stonehouse	70,399	166,144	136
Ashchurch for Tewkesbury	47,501	102,688	116
Gloucestershire	2,771,916	5,964,214	115

3.0 Rail infrastructure improvements

3.1.5 In the longer term the South Cotswold line should be electrified throughout. Even if only Swindon-Kemble were to be electrified, any additional services could run to/from Cheltenham as the entire GWR InterCity Express fleet is bi-modal.

Table E Key Rail Commitments and policy proposals

Junction capacity improvements

Abbotsford Junction (sic) should be Abbotswood Junction.

Capacity improvements including loops

Existing loops such as Charfield have already been used for faster trains to overtake stopping services. Haresfield loop could also be adapted for passenger trains.

3.2 We support the policy proposals listed but believe that a strong business case can be made for additional stations. The substantial growth in usage of all existing stations in the county suggests that any abstraction would soon be cancelled out by increased patronage overall. Firm plans need to be developed in order to qualify for assistance from the New Stations Fund.

4.0 Rail Service Capacity Improvements

Table F Rail service policy aims

The aims on page 18 concentrate on London services, which have recently been enhanced. More attention is needed to improve connectivity on other routes, particularly from Gloucester, which needs reinstatement of at least some calls by North East / Manchester- South West services which were removed in 2003. There ought to be some scope to do so now that capacity on the Bristol-Birmingham route has been improved by the quadrupling of Filton Bank and the opening of Platform 1 at Bristol Parkway.

The Strategy gives the impression that service patterns are largely set in stone. The franchising system, with its prescriptive service requirements, tends to reinforce a policy of minimal change. Yet service planning is a flexible art and needs to take account of changing travel patterns.

We agree that Ashchurch for Tewkesbury needs an hourly service to support proposed new housing and trains in both directions suitable for normal office hours in Cheltenham and Gloucester.

4.2 Policy LTP PD5.2 Rail Service Capacity Improvements

We support the proposals in principle. Reopening the Honeybourne- Stratford-upon-Avon line should be progressed as a step towards longer-term restoration of Cheltenham- Stratford as a strategic route linking major centres of tourism.

5.0 Rail Station Improvements

Better weather protection at stations is essential because the British climate is a deterrent to greater use of public transport. This is especially true at Ashchurch for Tewkesbury, Cam & Dursley, Lydney and Stonehouse, which all have basic shelter.

5.1.8 Gloucester station needs better toilets, easier interchange with buses and screens showing bus departures from the Transport Hub, which itself needs to display live train information if it is to live up to its name.

5.1.9 Stroud station needs level access between platforms and bus information screens. The constraints on parking at Stonehouse are an argument both for encouraging sustainable access and reopening Bristol Road station.

5.1.12 Sustainable access to Kemble station needs to be given a higher priority. It cannot just be regarded as a parkway station. The proposed Cirencester Community Railway would be an attractive non-car feeder to the recently enhanced main line services at Kemble.

Table G Station access key finding and recommendations

We agree that the present environment of Gloucester station is poor but it will improve with the imminent demolition of the unsightly Bentinck House and multi-storey car park on the opposite side of Bruton Way. We also support the planned improvement of the station subway.

Lydney station is a major success story despite its basic facilities. This must surely

justify improvements to its train services and passenger accommodation.

Our conclusions

Railfuture believes that the LTP Review is not bold enough in addressing climate change and other adverse effects of increasing road traffic. Given that rail accounts for only 1.59 % of carbon emissions and road 80 % in the UK, the Council needs to encourage greater modal shift. We doubt that significant progress in that direction is achievable with only the existing nine railway stations in the county.

Unless Gloucestershire commits to greater investment in its rail network, its rail aspirations risk being sidelined by the more developed plans of other local authorities.