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Stratford upon Avon Area Transport Strategy - Consultation  
Transport Planning Unit  
Warwickshire County Council  
Shire Hall  
Warwick  
CV34 4SX

You can contact us at:  
166 Windy Arbour  
Kenilworth  
Warwickshire  
CV8 2BH  
email: suawoox@icloud.com

*Dear Sir/Madam*

### **Stratford upon Avon Area Transport Strategy**

The following comments are made in response to the consultation on the Stratford upon Avon Area Transport Strategy (SATS).

#### **Executive Summary**

- The role and potential of rail as part of the SATS is seriously undervalued and the aspirations that are stated are based on fundamentally flawed assumptions.
- The need to reduce 'high car dependency' is contradicted by proposals within SATS that will see new roads built that will generate more traffic onto the existing road network.
- The importance of the local economy is largely overlooked. Properly examining, through an objective study, railway expansion bringing greater connectivity to local businesses, especially in Stratford Town Centre, could be worth up to £20m a year. The SATS states support for a reopening (GRIP4) study is a low priority. Such a prioritisation, based on no information, cannot be credible or legitimate.
- The above average use of cycles is undermined by a defeatist attitude that suggests the 'potential for increasing this mode share is fairly limited'.
- While improved bus services are to be welcomed these are in effect aspirational as they are unfunded and need to be commercially viable to operate.
- There is no recognition that Stratford upon Avon is situated within the Birmingham Housing Market Area within which 38% of peak morning journeys are now made by rail.
- No reference is made to the Long Marston Garden Village Expression of Interest (Bid) that was made in 2016 that was successful with Garden Village status being conferred on the Long Marston site in January 2017. The bid made no less than 11 separate references to the benefit of restoration of the Stratford-Honeybourne railway, this included seeking funding for a GRIP 4 Study.
- Despite the recognition of high car dependency in the SATS there is no significant reference to the impact on surrounding villages and rural roads of the 29,000 motor vehicles that the SATS states are likely to join local roads by 2031. This is compounded by the failure to address the potential impact with tangible proposals and schemes that could attract significant modal shift. The proposed Relief Roads cannot guarantee nor stop vehicles choosing to continue to take shorter routes to and from work using rural roads and through villages.

## **Comments to specific headings in the SATS**

### **Introduction**

SATS refers to listening to the community and interest groups. The Shakespeare Line Promotion Group has well over 100 members and is the recognised rail user group for the railway line between Stratford upon Avon and Birmingham Moor St/Snow Hill via Henley in Arden as well as services between Stratford upon Avon and Warwick/Leamington Spa – London. At no point have we been asked our views or had any ability to input to SATS.

### **Socio-Economic Issues**

While SATS refers to the importance of the visitor economy it fails to recognise the role of rail services. If it had used the Ove-Arup Report of 2012, of which Stratford on Avon District Council were involved, SATS would have noticed and considered the depressed level of visitors to Stratford by rail compared to the national average for other similar visitor destinations. The Ove-Arup Report of 2012 identified that Stratford upon Avon attracted a mere 6% of its visitors by rail yet the national average for similar destinations is 13%. Using the latest available Economic Impact Study on Tourism from Stratford on Avon District Council dated 2014 the difference from the 6% to the 13% amounts to over 440,000 visitor journeys. Applying the economic values from the same EIS suggests that the latent demand that could be released by better rail connectivity is worth up to £20.8m a year to Stratford's local economy.

### **Transport Problems & Opportunities**

#### **(i) High Car Dependency – Park & Ride**

The aspiration set out in SATS to improve the Park & Ride (P&R) facility at Bishopton is undermined by the actions of Council themselves. Car parking charges have now been introduced which dissuades usage. Funding to provide evening services to and from the P&R was withdrawn in 2015. The Council refused to fund the Southern P&R once the Section 106 funding ceased. These actions amount to a failure to support P&R facilities let alone expansion and development of them.

#### **(iv) Public Transport Provision - Bus Services**

A greater role for bus services is envisaged but there is no recognition within SATS that over 90% of bus services are operated on a commercial basis, consequently the County Council has little or no control over the provision or maintenance of most bus services. The 10% of bus services that the County Council does have control over has been significantly impacted by the reduction it has made in the revenue support budget of 45%. Nationally bus services are declining at around 2.5% a year. SATS fails to set out how the County Council proposes to reverse this national trend with bus services and/or identify where the required funding is to come from. The bus network map is erroneous showing a number of services for 2017 yet several have been withdrawn.

#### **(iv) Public Transport Provision – Rail Network**

The paragraph devoted to rail services seriously undervalues the existing importance of rail services to Stratford and the potential that arises from developing them. Combined the two railway stations at Stratford upon Avon are now handling in excess of one million passenger journeys a year.

Rail services are seriously constrained by Stratford upon Avon's 'terminus' status and there is no recognition of the need to match rail connectivity with that enjoyed by other similar major UK visitor attractions.

## **Objectives**

While elements of the objectives are laudable and are supported such as reducing air pollution, improving pedestrian and cyclist access as well as protecting the Town Centre the greater objectives do not include the potential role of rail and the need to develop better and direct public transport connectivity to effectively reducing traffic congestion and high car dependency. The objectives infer, by the omission of other transport modes, that only new roads can solve the problems faced by Stratford, this is fundamentally flawed and crucially will not solve vehicular congestion in the medium to long term so crucially it is unsustainable.

The 'road exclusive' objectives are unsatisfactory and fly in the face of Standing Advisory Committee on Trunk Road Assessment (SACTRA) 1994 that concluded after four decades of new road construction to meet demand was a failed policy. SACTRA concluded that new roads lead to drivers making new trips they would not otherwise make and will travel longer distances just because of the presence of the new road. This well-known and long-established effect of 'induced usage' means that the predicted congestion benefits of a new road are often quickly eroded. Traffic levels on bypassed roads can also rise faster than expected due to induced usage traffic, all of which means the hoped-for benefits of a new road can evaporate very quickly.

Rail services, bus services, cycles and better pedestrian facilities need to be integrated into a set of overall transport objectives that ensure reduced vehicle congestion, lower car dependency, lower levels of emissions, safer routes for cyclists and pedestrians. These can be delivered by higher frequency and direct public transport services to/from Stratford upon Avon.

## **Policies**

### **Policies 1 & 2**

The proposal to construct a link road between Alcester Road and Birmingham Road should not prevent the development and provision of facilities at Stratford upon Avon railway station for the installation of a turntable and other facilities to support the operation of steam excursions to and from the town. If the road proposal determines the loss of being able to develop such facilities at Stratford upon Avon station then it is objected to.

### **Theme 2: Strategic Road, Rail and Air links**

The reference to Junction 15 of the M40 (Longbridge Island A46/A429) does not recognise the failure already apparent at peak times with A46 traffic flows despite the £78M expenditure to install partial grade separation between the A46 and M40 junction.

Traffic flows experienced at Longbridge Island at peak times, and indeed through South Warwickshire villages on a northward track to/from the West Midlands conurbation and Birmingham are contributed to by vehicles because of the poor availability of rail services at Stratford upon Avon, South Warwickshire, North Gloucestershire and East Worcestershire with the West Midlands and Birmingham.

The aspiration expressed to improve rail services specifically with London is wholeheartedly supported but not as stated in the Strategy through seeking to improve the Stratford-Warwick-Leamington rail corridor. Little, if any, further line capacity south between Leamington Spa, Banbury, Bicester or Oxford now exists. Network Rail indicate that intervention will be required at Leamington Spa by 2043 due to inadequate capacity. Consequently, for Stratford upon Avon there is a need to look at a different and better solution in terms of where to invest in rail infrastructure to achieve this aspiration.

There is no recognition that improvements to Stratford upon Avon – London services using the Warwick and Leamington Spa route is also riven with serious operational constraints. The single line between Bearley Junction and Hatton West Junction. The need to address severely speed restricted curves at Hatton but moreover the lack of available train path capacity on the Leamington – Banbury – Marylebone route.

This means that there is limited scope to improve shuttle services, which are not as attractive as through rail services, and it also determines that passengers using shuttle trains connecting with Chiltern services at Leamington Spa often leads to passengers from Stratford not being able to get a seat on the popular Chiltern Birmingham - London Marylebone bound services that frequently arrive at Leamington Spa already heavily loaded.

### **Policy 3 – Measure 3**

We believe that the development and improvement of Stratford-London services need redefining for the reasons outlined above in our response to Theme 2.

The strategy fails to consider the potential for reopening the Stratford-Honeybourne railway line that would enable through services to run using the Cotswold Main line for services to/from Oxford, Reading, the Thames Valley and London Paddington.

The potential reopening of the Stratford upon Avon to Honeybourne railway line is assigned as a 'low priority' scheme. Without a comprehensive examination of the scheme and its requirements, benefits and issues no priority can be legitimate. Consequently, the 'low priority' position is untenable, indefensible and tantamount to condemning a patient in an A&E department to continue to wait without examination because they look alright only for them to eventually collapse without receiving treatment because of serious internal injuries.

**At the very least, a minimum requirement needs to be included in the Strategy that supports and seeks a rail industry standard study up to GRIP 4 stage on the reopening proposal.**

**Further, the Strategy should take note of the need and thus support and seek an Economic Impact Assessment of the railway reopening proposal so as to ascertain the value to the local economy should such a scheme be promoted and developed.**

There are a number of core factors that need to be acknowledged and considered by the Strategy in relation to the proposal for the potential reopening of the railway between Stratford upon Avon and Honeybourne, these are;

- The proposal enjoys the active support of adjacent higher tier authorities being Gloucestershire, Worcestershire and Oxfordshire County Councils.
- The Planning Inspector in his final report on the Core Strategy of Stratford on Avon District Council stated the line would “provide a long-term solution to the town’s traffic congestion.”
- Train Operating Company, Great Western Railway, include the reopening proposal as part of their “North Cotswold Vision” which was launched in February 2016.

- The Stratford Core Strategy Examination, Statement of Common Ground, between Warwickshire County Council and Cala Homes, developer of Long Marston Airfield, (HD.34, January 2015), confirmed Warwickshire County Council recognised the potential for reopening the Stratford-Honeybourne-Worcester/Oxford railway which would potentially increase the modal shift and sustainability of the LMA site.
- Stratford-upon-Avon lies within the Birmingham Housing Market Area and the draft Network Rail West Midlands & Chiltern Route Study 2016, confirms that 38% of all peak journeys into Birmingham City Centre are made by rail. Commuting by rail into Birmingham is forecast to grow by 49% to 2023 and by 114% by 2043.
- The proposal would enable a frequent orbital service to operate bi-directionally serving the West Midlands, Birmingham and South Midlands corridor. Crucially it would also enable a new station to be constructed at the Garden Village Development to serve the Long Marston hinterland that is estimated to have a population of 22,700 by 2031. This would facilitate a potential 45 minute direct Long Marston-Birmingham rail journey, a significant encouragement to deliver modal shift.
- The level of visitors by rail to Stratford upon Avon is 6%, this is severely depressed when compared to other similar UK visitor destinations that enjoy 13%. This poor level of visitors by rail is directly related to the infrequent and poorly connected services with London but also the terminus status of Stratford upon Avon on the rail network. The terminus status prevents a direct connection with the Cotswolds, the Thames Valley and London. Further, it militates against connectivity with the South West and South Wales, which if the line were reopened would be directly accessible via Worcestershire Parkway now under construction. Achieving the 13% level of visitor journeys by rail at Stratford upon Avon represents 441,000 visitors a year worth an annual indicated £20.8m value to the local economy.
- Restoration of the railway between Stratford upon Avon and Honeybourne would facilitate new services with the ability to serve a major population around Long Marston. This would provide the ability to run more frequent and semi fast services between Stratford upon Avon and Birmingham via Henley in Arden, Whitlocks End and Shirley.
- No operating subsidy was envisaged in the 2012 Ove Arup Report on the potential re-opening. With the significantly changed and more beneficial circumstances arising from development at LMA, construction of Worcestershire Parkway and proposed orbital West Midlands/South Midlands services the financial viability of rail services using a reopened route indicated previously is likely to be significantly consolidated.

### **Policy 3 – Measure 4**

This refers to a rail link with Birmingham International Airport and the HS2 Interchange. This was seen as recently as November 2016 as a low priority by respondents to a consultation via Stratford District Council's Citizens Panel process. Further, the existing direct rail service available between Stratford upon Avon and Solihull already delivers a journey time of just 33 minutes.

The construction of a rail link between Solihull and Birmingham International Airport would be largely a matter for the West Midlands Combined Authority, Midlands Connect and Solihull Borough Council. Previous examinations of this proposal have led to dismissal due to the urbanised nature of the area any link would need to traverse.

### **Theme 3 – Public Transport provision within Stratford upon Avon and across South Warwickshire and neighbouring authorities.**

There is no reference to the point we raised earlier that relates to the active support of the potential reopening of the railway between Stratford upon Avon and Honeybourne by adjacent higher tier authorities being Gloucestershire, Worcestershire and Oxfordshire County Councils.

There is no reference to working and developing a strategy for greater usage and better rail services along the existing Birmingham – Stratford upon Avon railway lines that seeks the active involvement and participation of Midlands Connect (MC) who are the adjacent and critical stakeholder in such services. Recent approvals from Central Government to meet MC's wishes to expand rail capacity, in terms of more seats and services for the West Midlands, demonstrates they are a key influencer. If Warwickshire in general and Stratford upon Avon in particular continued to be disengaged with MC the critical need for representation and consideration of Stratford's area needs will continue to be overlooked.

The aspiration of SATS to provide "frequent and swift bus services with bus priority" is unrealistic and unachievable because of existing levels of traffic congestion. The forecasted addition of some 29,000 vehicles arising from proposed level of housing development now approved in the Core Strategy will compound traffic congestion further without the provision of alternative transport infrastructure providing greater rail connectivity.

Bus services are determined by commercial demand with a small number of services now receiving public subsidy. National trends which show a decline in bus service usage and low levels of usage experienced arising from new development simply do not support the demand needed for the commercial viability of most bus services.

Further, bus services do not provide medium or long distance services that are usable for commuters. Buses cannot compete with point to point journey times that rail can deliver. A better approach would be to develop an integrated package of measures that utilise and develop frequent bus services to and from Stratford upon Avon railway station.

Financial incentives to use the bus and train as a combined means of public transport would improve bus service patronage, increase rail journeys and crucially reduce the high and above national average home work car dependency pervading Stratford upon Avon and its surrounding area.

### **General**

We submit the foregoing to the consultation on the SATS together with our Delivering Growth and Connectivity document, also enclosed with this letter, the document should be considered to form part of this submission.

We request that Warwickshire County Council formally review its Local Transport Plan specifically in relation to Policy PTPR4 in view of the significantly changed circumstances related to the Core Strategy of Stratford on Avon District Council. This request is reinforced by the specific comments made by the Planning Inspector in his Final Report on the SDC CS published in June 2016. The Inspector referred to the need for a comprehensive study into the railway reopening and the opportunity for part developer funding which would not last forever. To date the Inspector's comments have been ignored by the County Council as LTA.

Warwickshire County Council should commit, support and participate with other stakeholders, including adjacent local authorities, to undertake and complete an Economic Impact Assessment of reopening the railway between Stratford upon Avon and Honeybourne.

A GRIP 4 Study (effectively an comprehensive business case) should be pursued with other stakeholders, including Warwickshire's Local Enterprise Partnership, to enable the County Council to properly and comprehensively consider its position on the potential reopening of the railway between Stratford upon Avon and Honeybourne. Only in such circumstances can any priority then be applied legitimately.

A policy of engagement, participation and active involvement with Midlands Connect (MC) should form part of the SATS. With some 27,000 new homes due to be built along the catchment of the existing North Warwickshire railway by 2031 it is critical that Warwickshire County Council seek formal involvement with MC to ensure that better, faster and more frequent rail services are provided through plans and development of adequate rail infrastructure to provide a rail service fit for the 21<sup>st</sup> century.

Thank you in anticipation of your attention and consideration. I would be grateful if you would acknowledge receipt of this submission.

Fraser Pithie  
Secretary

Encl.