

Part B – Please use a separate sheet for each representation

Name or Organisation: **Stagecoach West**

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="Y"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="N"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="Y"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Carbon, transport and spatial planning

In 2018, Stroud District Council declared a Climate Emergency. It seeks to achieve carbon neutrality across the District by 2030. The primacy of this goal is clearly expressed at the outset in the draft plan, in new draft Core Policy DCP1.

This focus demands that the influence of transport in plan-making becomes a central theme and driver in setting a spatial development strategy, in evaluating potential development sites, and in setting criteria for urban design of new development. Despite warm words and broadly supportive policy statements over the last 20 years that claim to prioritise sustainable modes, transport-related emissions continue to rise to the point where they now account for about a third of all domestic emissions, and where road transport accounts for 25%. The majority of this arises from single occupancy car use.

Much of the cause of this unsustainable trend arises from the treatment of transport as a subordinate consideration in plan-making and decision-taking compared with almost any other theme. The weight

given to transport matters in the planning system is entirely discretionary. Compared with absolute protections and clear targets and standards applying to most other planning considerations it is evident that none exist for transport.

The perpetuation of unsuitable car-dependent patterns of development and urban design can hardly be a surprise, given this situation.

However, legally binding national decarbonisation targets, are now in place. **Government now recognises that the evidence clearly shows that very substantial mode shift must be achieved if these goals are to be met.** This was first expressed in DfT's Green Paper *Decarbonising Transport: Setting the Challenge* (March 2020). In July 2021 as this consultation was closing, the Government published "Decarbonising Transport" as its plan to achieve those goals. This re-iterates the previous ministerial statement that **"we must make public transport, cycling and walking the natural first choice for all who can take it."**

Unlike the 2020 paper, the **government's transport decarbonisation plan also belatedly recognises that there is Gordian Knot between patterns of development and place-making, and transport choice and behaviour: "We must also do better at joining up our transport, decarbonisation, and planning goals in both urban and rural areas. Too many new developments – not just by housebuilders, but by public-sector bodies – are difficult to reach without a car."** As a result a specific commitment is made by Government: **"We will embed transport decarbonisation principles in spatial planning..."** At page 156 this is elaborated upon: *"Where developments are located, how they are designed and how well public transport services are integrated has a huge impact on whether people's natural first choice for short journeys is on foot or by cycle, by public transport or by private car. The planning system has an important role to play in encouraging development that promotes a shift towards sustainable transport networks and the achievement of net zero transport systems."* Stagecoach has been urging government to recognise this for some years.

It goes on to say *"A reformed planning system can assist in achieving the ambition of a zero emission transport future. The planning reforms will provide an opportunity to consider how sustainable transport is planned for and importantly how it is delivered to support sustainable growth and drive more sustainable use of our existing built environment... We are working with the Ministry of Housing, Communities & Local Government and the Local Government Association to place cycling, walking and public transport provision at the heart of local plan making and decision taking for new developments. (page 157).*

"Achieving these ambitions will require a long-term collective effort across government, local authorities, communities, businesses, and developers." (page 158) We unequivocally agree. Our commitment to date to supporting the development of a sound plan in Stroud District should give all stakeholders and participants comfort that Stagecoach is already actively playing its part. Plan-making needs sustainable transport operators to be "inside the tent", increasingly involved in co-producing sustainable development strategies, rather than feeding information by whatever methods we legitimately can "over the wall" of what often in practice is the planning system's "secret garden".

The objectives are set and, now, the direction of policy travel is clear. In the light of these statements, Stagecoach expects a set of revisions to the National Planning Policy Framework (NPPF) to substantially strengthen the requirement to demonstrate that both development strategies and development design fully secures and embeds the principles that walking, cycling and public transport demonstrably offer the best choices for local journeys.

While this Plan will be examined for its conformity with existing national planning policy, these themes are from from absent in the existing language both in Chapter 9 (Transport) and elsewhere. Not only that, the Council's own commitment, including in its own statements of the plan's strategic objectives and Key Priorities, put carbon mitigation, and by extension transport, centre stage. This plan offers perhaps the biggest single opportunity the Council has to drive forward its own ambitions for the District: not just for new development, but the way the whole of the plan area evolves. A single-minded focus on securing the objective is required.

Stagecoach recognises and welcomes the commitments set out by the Council and endorses the identification of the key issues, strategic objectives and key priorities that the Council is seeking to achieve through this plan. We continue to seek to work in close collaboration with the Council as Local Planning Authority, Gloucestershire County Council as Local Transport and Highways Authority, the development sector and other key transport stakeholders including Highways England and the rail sector, to deliver these highly ambitious goals.

Our ongoing constructive participation at all stages in the plan-making process is testament to this.

While we are in agreement with many of the underpinning tenets of the plan and its development strategy, we have very serious concerns that as published, this pre-submission plan falls a good way short of demonstrating that it is properly justified, will be deliverable, and will be effective. We set out our broad concerns about the plan and its evidence base in this section. Comments on specific policies follow in the format required by the Council, focused on specific proposals.

The centrality of a sound transport evidence base

The National Planning Policy Framework (NPPF) makes clear that plan-making cannot be done in a vacuum. The establishment of a relevant, up-to-date and proportionate evidence base (NPPF Paragraph 31) is essential to underpinning the analysis that underpins an appropriate and sustainable development strategy and the subsequent selection of sites for allocation by the Local Planning Authority. That NPPF explicitly refers to a properly evidenced plan at paragraph 35 b) makes plain that this matter is at the heart of the soundness of this Plan.

At this crucial Regulation 19 stage, the Council is making a formal statement that it believes that the pre-submission draft is sound in all respects.

Unfortunately, while Stagecoach supports a very great deal of narrative being the Plan and the majority of the site allocations made, we do not agree. We do not consider that the transport-related evidence base is either consistent or proportionate. **We do not consider that the plan is properly justified. Accordingly, we conclude that it cannot be considered sound, as currently drafted.**

We have particular concerns that the selection of the largest single proposed allocation in the Plan, at Sharpness Vale, and a smaller one adjoining it at Sharpness Docks, are out of conformity with the evidence base that does exist, and accordingly are improperly justified.

This has potentially serious potential ramifications, for patterns of transport, social and economic interaction, and carbon, of a scale that cannot be overlooked.

The role of transport infrastructure providers and operators in plan-making

NPPF states clearly at paragraph 16 c) that plans should be "*shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators*" (our emphasis). Accordingly, Stagecoach West has consistently and duly engaged with the process of preparing the Local Plan Review. We recognise the value and importance of participating actively and fully to support the District Council and other stakeholders, not least the County Council, as Local Highways and Transport Authority, and Highways England, in arriving at a sustainable development strategy that is properly evidenced and is appropriate. In particular, we are concerned that the Plan conforms to the requirements set out in Chapter 9 of the National Planning Policy Framework, especially paragraphs 102-103.

The role transport infrastructure providers and "relevant bodies" **expected to collaborate** in plan-making is elaborated upon in paragraph 26 of NPPF: "**Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.** In particular, joint working should help to determine where additional infrastructure is necessary..." The list of likely such bodies set out in paragraph 25 is not exhaustive. However, we recognise that there is a clear distinction in planning law between those bodies that are statutory consultees, including Highways England and Network Rail, and transport operators, including Train Operating Companies and Commercial Bus Operators, who do not have such status.

Nevertheless, it is evident that appropriate formal and informal input given by public transport stakeholders is "integral" to the preparation of a sound plan. The language of NPPF is clear: without being able to demonstrate effective and on-going collaborative engagement with these kinds of stakeholders the integrity of a plan risks being seriously compromised.

This is all the more critical in the case of Stroud District, where the Plan acknowledges at the outset and in its Key Priorities and Strategic Objectives, that car dependency and the carbon-intensity of transport is very high and rising, while the availability of public transport is "limited". This collaboration should be expected to inform, identify and substantiate the sustainable transport interventions needed to support sustainable development: whether new infrastructure, new and improved services, or both.

In a world where unprecedented change in travel behaviour is now accepted to be needed to support local and national carbon mitigation trajectories, the engagement of public transport stakeholders becomes even more critical.

The role of Stagecoach West in Stroud District

Stagecoach West is the main public transport operator in Gloucestershire. **Prior to COVID we boarded almost 11 times the number of customers on our bus services across the County than did all the rail operators at all the Gloucestershire station combined.** Our role in providing for both local and longer-distance mobility is substantial.

While COVID has had a very severe impact on public transport use and our business, even before the restrictions are lifted, we have seen the majority of our patronage return. Boardings continue to steadily rise. While there is likely to be some longer-term shifts in demand and some trips, such as discretionary travel by pensioners on free passes, are likely to remain depressed for longer, we see no evidence that the demand for bus services in Stroud District will permanently remain greatly subdued.

Stagecoach is also the largest bus operator in the Plan area, operating the vast majority of commercial mileage prior to COVID, and a very large proportion of that financially supported by the County Council. We have made substantial progress stabilising and evolving the bus network in the District to respond to changing patterns of demand and existing growth. For example, in April 2020, in the depths of the initial lock-down, we initiated service to the major allocated site at Hunts Grove via the Waterwells employment site, as soon as a suitable route and turning facilities were provided to us. In partnership with Robert Hitchins Ltd. we will be operating through Great Oldbury, which is the second largest single development currently underway in the District, and this will have been provided in advance of the contracted trigger point set out in the developer obligation. More generally we have invested in developing our services throughout the District, including converting most of our key inter-urban routes to our premium gold brand in recent years. We have seen steady patronage growth.

We have supplied a great deal of detailed evidence, formally, to the Council and other stakeholders about the existing and potential public transport improvements that could be expected to offer a realistically relevant choice to meet travel needs. This is not simply a matter of serving new development well, but also in increasing the bus mode share from existing residents and employees, to help damp travel demands on the existing network.

The Engagement with, and the evidence supplied by Public Transport Stakeholders

Stagecoach West has made consistent, detailed and carefully considered representations at every stage of the plan preparation process. The last of these was at the Regulation 18 "Emerging Plan" stage. These representations were especially lengthy and reflected the amount of care and attention to which we went to scrutinise and inform all aspects of the draft plan strategy and strategic allocations. This company has a very strong track record of such participation across multiple LPAs over a very wide area going back some years.

Given the particularly great transport challenges faced in Stroud District, the peculiar nature of the opportunities and risks that exist, and the high level of detail into which the draft policy material went (as opposed to the transport evidence base then available), these representations were the fullest we have ever made to a Regulation 18 consultation anywhere in England.

We also, as a matter of principle, seek to engage as deeply and as fully as possible with development sector stakeholders. Our activity seeks to both proactively and positively steer promotions and proposals to those areas and sites that can make the fullest use of existing and potential high quality public transport services, and in so doing also help reinforce the effectiveness and attractiveness of bus and coach services to the widest public. Our input at the Issues and Options stage of this and other plans is one of the most important stages of our engagement as it signals to all stakeholders, at "the earliest possible stage" required by NPPF paragraph 101, the bus service corridors that are most likely to support high and higher levels of public transport use. This activity is indeed "ongoing and collaborative". We have been dialogue, to one level or other, with all the main promoters with interests in this plan. In many cases, our specialist professional input has helped shape the development framework and urban design of emergent proposals in some depth. Subsequent representations will cross-refer to this.

This level of engagement reflects the exceptionally strong alignment of interests that we have with the LPA and the County Council as Local Transport and Highways Authority, and, to a lesser extent, with Highways England. **Unsustainable car-dependent development patterns have lain at the root of nearly all the major problems we face as a business.** High levels of car use, especially when coupled with strong rates of housing and employment growth, have led to great increases in traffic congestion that greatly increase our costs and steadily erode our ability to provide either a relevant or a reliable service to our existing customers and the public we seek to attract. The threats posed by unsustainable patterns of development to bus services greatly exceed any small-scale tactical

commercial advantage that might accrue from diverting or extending services to serve major new developments, important no doubt though that is.

Our engagement is therefore professional, and takes the broadest possible, multi-modal view. **The primary outcome Stagecoach seeks is patterns of development and urban design that minimises car use, and traffic mileage.** Therefore, any development strategy and specific development proposal that maximise the use of walking, cycling, and public transport will be strongly supported, **whether or not there is a particularly material direct commercial benefit to Stagecoach. Our interests are anything but parochial.** We regularly strongly support planning strategies and proposals, such as around existing rail stations and well-served by other bus companies' services, where we will not directly serve the locality at all, and can point to public material evidencing this on request. We have produced formal urban design guidance to all development sector stakeholders, which is nationally-recognised, and has won awards. This is a resource used by stakeholders where we have no current business operations.

We need to contrast our engagement with that of the rail sector. Its interests are not tightly aligned with the wider planning system, but are much more proprietorial. Rail stakeholders, unlike the bus industry, are not exposed to any direct business risk arising from any given spatial pattern of development. Rather, any kind of development is more likely than not to have a positive impact on demand, however small. Rather, Network Rail in particular now seeks to maximise investment in the railway from the development sector, irrespective of what the wider implications of this are.

Further, the history of the railway in the UK and the legal and regulatory framework under which it operates means that the railway has no great need to collaborate with external stakeholders. The sector benefits from an exceptional degree of organisational and regulatory isolation from the "non-railway world". Activity is therefore almost entirely focussed internally within the sector.

However, **the amount of attention being paid by the Council and some promoters to the existing and future role of the passenger railway is exceptional**, justifying both the overall development strategy and the largest proposed allocation at Sharpness Vale. It involves two new stations on the Birmingham to Bristol Main line, at Stonehouse (Bristol Road) and at Hunts Grove on the southern fringes of Gloucester, which have been aspirations for approaching 20 years to date, but where little meaningful progress towards establishing deliverability, much less delivery, has actually been made.

The most startling proposal is the creation of an entirely new rail service, between the proposed new settlement of Sharpness Vale, to Gloucester. This requires the rehabilitation and reopening of a historic branch line, and the introduction of an entirely new train service passing over the main line over most of the distance involved, between a junction south of Cam and Gloucester.

Given this reliance, it is entirely appropriate to look at how far Network Rail as the Infrastructure Provider and Great Western Railway, as the current Train Operating Company (TOC) providing local stopping services in the area, have engaged with collaborated and informed these proposals, and the plan as a whole.

First, it must be stressed how little direct local influence over rail investments and services any local authority has, much less any development promoter. The reasons for this are set out at the start of Section 7, the Western Gateway STB's Rail Strategy 2020-2040 which we refer to below. At 7.2.4 the Strategy explains that **"From a rail perspective, governance of rail franchises also remains with DfT, leaving Western Gateway with limited influence over decisions made about services or rolling stock to best serve residents and businesses in the region."**

If this is true of the STB, which exists precise to rationally engage with the rail sector on behalf of the wider locality, the influence of any Local Transport Authority acting alone will be still lesser; and that of the Local Planning Authority or a development promoter, minimal. The failure of multiple rail investments underpinning local plan strategies to come forward across England over 30 years amply testifies to this. Among these disappointments in the continuing lack of progress delivering the new Hunts Grove Station in Stroud District

The recently-announced major "Williams-Shapps" reform of the railways makes the control of DfT over the railway in England, through Great British Railways, over both infrastructure and service interventions, even more total.

Network Rail has never been the only or even the main arbiter of what service levels are provided on the railway in any case. Irrespective, it can be seen that to date, **Network Rail has made virtually no public formal representations to the Plan.** Such as it has made to the last Regulation 18 consultation run to a few hundred words, which do little more than make a general statement that, it will examine with the promoter of Sharpness Vale the technical feasibility of a scheme that the

developer would have to fund entirely from its resources. It makes no representation about the certainty of this. There is considered implicitly to be no need for there to be any view taken about the business case for any such intervention as this falls outside Network Rail's own business requirements, and therefore nothing is said. It says nothing at all about the costs, technical deliverability or wider network impacts of new stations at Hunts Grove and Stonehouse (Bristol Road).

Great Western Railway, as TOC, has made no public statements at all that suggest it has been meaningfully involved in informing any proposals in the plan, including in particular, the costs and business case for a new rail service between Sharpness Vale and Gloucester (or anywhere else). Nor has it made any statements or supplied any evidence that we can see in the public domain about the level of passenger service that could or would be deliverable at new stations at Hunts Grove and Stonehouse.

Three important further pieces of work relevant to the potential for development of the rail service offer in Stroud District must be highlighted. None of these is referred to in the Plan.

The first is the Strategic Transport Plan for the Western Gateway that is being prepared by the Western Gateway Sub-national transport body (STB). This organisation has been established relatively recently as an institutional locus to synthesise and prioritise investments in the railway and the strategic road network, acting as the key interface between Local Transport Authorities and both DfT Highways England, and the rail sector: network rail and the TOCs. Gloucestershire lies within this STB. STBs exist to ensure cross-boundary and strategic opportunities and constraints are properly assessed and highlighted. Consequently, *"the multi-modal Strategic Transport Plan is intended to complement local transport plans to enable the delivery of shared objectives. By considering these connections at a sub-national level, it enables the full journey to be considered instead of sections of the journey linked to local authority administrative boundaries. It also enables a long-term plan to be produced that identifies the transport issues within a corridor or area and identifies a sequenced list of investment priorities."* The STB's **Draft Strategic Transport Plan has yet to be published.**

However, the STB has recently published its **Western Gateway Rail Strategy 2020-2040**. This helpfully covers the entire plan period but was only published in late 2020. It therefore **has not informed the plan.** *"The strategy highlights 23 Conditional Outputs (CO's) which set out the ambition for rail and addresses the need for change in the Western Gateway region and sets out six route maps to follow to implement this strategy."*

Section 5 of this Technical Report highlights the particular conflicting issues that surround the Bristol to Birmingham line, which are long-standing. At the root of this is the limited infrastructure available to accommodate both fast inter-regional services, and local services stopping at all stations.

Section 6 of the Report sets out Conditional Output G1 "Transit-Oriented Development". Notably the STB work strongly articulates the increasing wider stakeholder concern about the misalignment of planning and transport strategies, and seeks to redress this.

Section 6.2.5 outlines what achieving this means in practice:

- *Land use planning and transport planning will be aligned in Local Plans in the Western Gateway, with an emphasis on sustainable transport. Where relevant in the specific geography, rail is identified as a key sustainable transport mode within the region's transport networks;*
- *The land use planning process takes account of the **proximity of sites to rail access points**, where this is relevant to the local geography and appropriate to the sites and developments under consideration; (our emphasis) and*
- *Planning policies recommend that masterplans for new strategic developments have sustainable transport at their heart, which includes access to rail where relevant and appropriate.*

All that said, it is then important to see where the STB considers the level of rail service and access to it will be provided over the 2020-2040 period. However at 6.2.14, actions taken to achieve these outcomes refer more to processes than any kind of substantive investments in the rail estate or services, in support of local plan strategies. **Perhaps surprisingly given the title of the document, no material evidence is set out about specific rail infrastructure and service interventions, including new rail stations or services, that can inform the current round of local plan-making.**

The second is the **Gloucestershire Rail Investment Strategy (GRIS)**. This was released quietly in March 2020 and thus also unhelpfully post-dates the last Reg 18 consultation, though it was available to the County Council as client some time beforehand. This has been prepared by SLR Rail, consultants for Gloucestershire County Council, in consultation with the rail sector. As such, GRIS is probably the

only meaningful point of engagement in recent years between the rail industry and the County Council of a kind that could be used to inform local plan-making, in the sense outlined in NPPF paragraph 32 and 35.

This is the only document that starts to examine the rail aspirations set out in the Stroud District Local Plan review within some kind of strategic and technically-informed context. Section 9 of GRIS refers to the Sharpness Branch line proposals. It makes clear that this initiative is entirely driven by the desire to "support significant new development around Sharpness". The value of any of the large number of options appraised at a very high level depends entirely on the delivery in full of development at Sharpness, unsurprisingly so given there is hardly any existing local population on which to draw.

The report is based on a generous methodology to assess NPV, and even this concedes that the benefits would be "*better than negligible*": hardly a ringing endorsement. It points out that "***it should be noted that the level of investment required to deliver this would be much higher than for a service alteration to an existing route.***" In other words, the business case is unavoidably seriously hindered by a high cost to benefit compared with service improvements on existing lines. The more important conclusion follows immediately afterwards on page 48: "***There is also a question over the opportunity cost associated with the use of scarce capacity for such services, which could be used for services delivering greater value.***" In other words, prioritising this intervention would preclude other much more beneficial interventions coming forward. As such even the most high-level formal appraisal by rail experts for the LTA concludes that putting a high priority on delivering any intervention to Sharpness would be likely to be unjustified and irrational.

Section 12.1 of GRIS summarises the results of GVA analysis for the full portfolio of possible rail service output deliverables identified for Gloucestershire. Figure 46 is very telling: **the case for any rail service intervention to Sharpness is very weak compared with any other**, and in particular, improvements to the Birmingham to Bristol "Regional" upgrade focussing on stopping trains, and Birmingham to Bristol improving both longer-distance and slower services. The latter offer almost six times the GVA impact, but cannot be accommodated alongside a Sharpness-Gloucester service using the main line.

Section 12.2 of **GRIS therefore concludes that "Options around Sharpness, and the Severn Bridge generate limited benefit relative to the costs involved."** Of those benefits, all are dependent on the development. It does nothing to improve service to a much larger population and contribute much more broadly to supporting higher use of public transport in Stroud District, across the County and beyond.

Section 14 then draws the evidence together to set out **four key rail service delivery priorities for Gloucestershire. The Sharpness Branch does not feature at all.** The highest priority is for the introduction of more frequent services on the main line: a priority that entirely clashes with provision of a new local rail service between Sharpness and Gloucester.

It is notable that GRIS is not being advanced by SDC as part of the Evidence Base for the Plan. We consider this omission to be quite grave.

The third, is Network Rail's own evaluation of the demands, outputs required, opportunities and constraints on the main-line railway between Birmingham and Bristol which the currently-proposed new Sharpness service must use. This is prepared under **Network Rail's Continuous Modular Strategic Planning (CMSP)** process. As is typical, the process and its timescales are quite opaque. This process is critical to establishing what infrastructure and service interventions are likely to be progressed. This is because, in the words of Network Rail:

The CMSP is designed to:

- *explicitly put passenger and freight users at the heart of the process;*
- *better address the route's business needs;*
- *feed refranchising, capacity allocation, development and delivery, and sale of access rights;*
- *employ a more effective, focussed means of consultation;*
- *provide more granular, targeted market insight;*
- *develop a 'service change' pipeline for future configuration state;*
- *and demonstrably focus on incremental opportunities and service trade-offs*

In other words, **it is the CMSP process that governs key decisions as to the future state of the railway on any given corridor.**

Unfortunately, the **Bristol-Birmingham CMSP Study has been delayed** from its target publication of November 2020. Despite a signal by Network Rail to some stakeholders such as WECA that this

would be delayed until April 2021, no Study Report has been published. We are informed verbally that the publication is "imminent".

Until this crucial point in the plan-making process, the extremely limited rail-related evidence provided in support of the plan strategy has been advanced only by the District Council, and the promoter of Sharpness Vale. The rail sector has been, and remains, all-but silent.

Stroud District Council, faced with this near total lacuna of rail sector support and engagement since the review process started, is left with few options at this final Regulation 19 stage to fill it. As a result it can advance as evidence only two bid proposals made under the **Restoring your Railways Fund**. If successful these would only release funding to start to evaluate the technical achievability and broad business case for proposals to restore the station to Stonehouse (Bristol Road) and a branch line railway and rail service to Sharpness Vale in some form.

Far from evidencing deliverability and providing a clear understanding of the costs and business case that is critical to informing development viability, this material evidences just how weak rail sector participation has been in the formulation of key elements of the plan strategy and the specific rail-related proposals. The strategic allocations at Sharpness (PS34 Sharpness Docks and PS36 Sharpness New Settlement) seem to largely depend on a major rail-related project to begin to look credible.

For the reasons we set out above, we do not see that this comes close to meeting the standards of "relevant, up-to-date, and proportionate evidence" demanded by NPPF, especially in regard to that required to support ambitious proposals for a rail-focused new town in an entirely new, remote location, distant from any existing public transport corridor – rail or otherwise.

The Published Transport Evidence Base

Given the pressure much of the highways network is already under, and the scale of development anticipated over the Plan period, it is vital that public transport plays the fullest possible role, "limiting the need to travel and offering a genuine choice of transport modes" (NPPF para 103) just to avoid congestion becoming ever-more endemic and chronic, with consequential impacts on the economy and public health alike.

We agree with the Council that the current public transport offer in the District is "limited" (DLP para. 1.1.12). This makes the spatial strategy even more sensitive to the demonstrable deliverability of credible public transport choices in all the strategic allocations.

The transport evidence base behind the plan starts to lay these issues bare. This comprises the **Stroud District Sustainable Transport Study** (STS) that was published alongside the initial Regulation 18 "Emerging Strategy" consultation in November 2018.

This has now been followed by a **Draft Sustainable Transport Strategy** (DSTS) (February 2021), and modelling evidence presented in a **Traffic Forecasting Report** (March 2021). **None of this material has previously been published, or available either for comment or input from ourselves**, or any other transport operator.

The Council does not attempt to draw on the other evidence available in the public realm and the Gloucestershire Rail Investment Strategy in particular. While the STS makes some reference to our input, it merely confirms our support for the principle of focusing development on the evident Sustainable Movement Corridors that are highlighted within it.

It is not sufficiently clear how the transport evidence base has contributed to the development of the spatial strategy. Indeed, it cannot have done, as the plan's strategy was clearly formulated well in advance of this.

However, since the last Regulation 18 consultation, the District Council has declared a "Climate Emergency". At national level, in March 2020, the Department for Transport set out in a paper "*Decarbonising Transport – Setting the Challenge*" the scale of the task involved in addressing the emissions from domestic transport as the largest single contributor to greenhouse gas emissions, accounting for over a third of the total and rising absolutely as well as proportionately, a point also recognised by SDC at para 1.1.12.

There is therefore **a substantially more pressing need to mitigate carbon emissions from transport and mobility.**

It is therefore specially notable that no part of the evidence base seeks to look at the relative carbon emissions impact of development strategy options, and in particular, how more compact patterns of development that relate more closely to the existing main settlements within the District and just beyond it, especially to Gloucester to the north would perform in comparison to the decision to “unmoor” a very large proportion of the development requirements to the most remote location within the District.

Sustainable Transport Study (2019)

Stagecoach was encouraged that this high-level work was undertaken by AECOM at a relatively early stage in the plan-making process. We recognised that detailed modelling of options was not possible at that time and that the modelling baseline needed both to be updated and sufficiently up-to-date by the time the plan reached Examination stage. Equally, we also recognised that cost constraints added to the practical limitations.

The STS highlights what, in essence, is obvious: the main transport corridors are set by the topography and other physical constraints of the District. There is the main North-South corridor followed by the M5 and its predecessor the A38, from which key branches connect to the east up the two main valleys that penetrate into the deeply fretted Cotswold escarpment.

The pattern of main bus services mostly follows these corridors: the so-called “**Sustainable Movement Corridors**” (SMCs) identified in the STS. We have consistently highlighted that it is on these corridors that the opportunities for improved, and potential new bus and coach connectivity exists. Obviously, where development is also located within relatively close proximity to key destinations on the SMCs, not only is the potential for bus use maximised, but also walking and cycling.

We have equally been very consistent and quite clear in pointing out that the cost of providing bus services to locations any distance off these SMCs will be greatly higher, while the likely effectiveness and impact of such services will also be much lower.

Draft Sustainable Transport Strategy 2021.

AECOM then continued to progress the evidence base work for SDC. It seems to be the main vehicle for gathering and assessing transport evidence to support the Plan.

We note that at the outset it is claimed that: “*stakeholder engagement has been fundamental to its creation. A wide range of views have been gathered, from those responsible for setting policy and with stewardship of the transport network, to local representatives, transport interest groups, transport operators...*” It is important for all stakeholder to be aware that the engagement of Stagecoach on the part of SDC an AECOM was limited to a single afternoon workshop in the SDC offices in early 2019, referred to on p 14 of the DSTS which did little to explore anything beyond broad strategies and principles, and highlight key areas of concern. In no way do we consider this to be “ongoing” “collaborative” involvement in the plan-making process that NPPF expects. We consider the statement in the document to be quite misleading.

Our own input through the formal statutory processes has furnished the Council with a great deal more insight. Despite our pro-action it is far from clear how this has informed the consultants or the Council.

We broadly agree with the majority of the key transport challenges for the District and any development strategy identified at the outset. However it is notable the misleading spin put on the work by AECOM: they note a rise in rail use, without noting that this is from a vanishingly small baseline. The bus offer - which we accept is “limited” (to quote the DLP) cross much of the District - is not “subsidised”; the majority prior to COVID actually run without public funding.

If the bus network is accepted to be “sparse” as the DSTS states, then the rail network (and level of service) could rightly be described as “threadbare”. There are only two rail stations in the District and none offers a better than hourly service.

The impression given at the outset of the DSTS is that rail is providing a high and rapidly rising proportion of journeys for increasing numbers of journey purposes in Stroud District, while buses are generally irrelevant and declining. This is a **serious distortion of the facts.**

However broadly we recognise and support the list of deliverable interventions as far as they go.

These are focused on a series of "Movement Corridor Packages". These are focused on the A38 N-S corridor, and the A419 running east to Stonehouse and Stroud, and the A4135 from Cambridge to Cam and Dursley. The corridors are shown in Figure 1 of the DSTS (page 24).

What is immediately apparent from Figure 1, and has been from the outset, is how well most of the proposed allocations relate to the MCs. However, the remoteness of the largest allocation cluster at Sharpness and Sharpness Vale is equally apparent. To get around this problem, the all-but abandoned freight branch line to Sharpness is given the same visual prominence as the main rail lines, despite the fact passenger trains cannot today use it, and is barely operational for freight.

What also is notable as a change from the initial STS, is the sudden and unexplained elision of the B4066 to Sharpness into the A38 corridor, in a retroactive attempt to create evidential alignment between this part of the development strategy and the road transport opportunities – particularly for bus (page 21). To compare this route with the A419 and A4135 which themselves are identified as Movement Corridors in their own right, leading to substantial existing centres of population as well as the railheads at Stroud and Cam stations is entirely spurious.

We have made consistently plain to all stakeholders from the very outset, and in some detail, that there is no possibility of delivering and sustaining a relevant and attractive bus service on this "branch" to Berkeley and Sharpness. Distances are too great, costs are too high and trip demands are split in too many different directions. These problems are fundamental and shared by all new settlements that are located to take advantage of remoteness, an attractive strategy for political, not sustainability reasons. We are extremely concerned that this crucial input, as a key public transport stakeholder, simply continues to be ignored by the Council.

Much of the rest of the **Draft STS covers proposed interventions for each of the proposed strategic allocations.** We will address these specific measures elsewhere in our representations made against each of the allocations. However, the interventions rely almost entirely on input from the promoters and their client teams. **AECOM has made no attempt to talk to Stagecoach or otherwise engage to validate the assertions made by any of the promotional teams.**

The language of the Report also seems to indicate that this is equally true for those allocations relying on major rail-based interventions: Sharpness. Here "*The applicant (i.e. the promoter) has advised that the re-opening of the Sharpness railway branchline for passenger services is feasible and can deliver an attractive train service to Gloucester*". The evidential robustness for this assertion is not reinforced by any further enquiry or analysis.

The Draft STS is thus:

- **not informed by ongoing collaborative dialogue with Stagecoach or as far as we can tell, any other public transport operator or infrastructure provider.**
- **Not able to demonstrate that it has synthesised the emergent priorities of the County Council; including in the Local Transport Plan, nor the views and investment priorities and commitments of any key transport stakeholders as to how the public transport offer in particular can be developed optimally. This includes as a baseline, planned committed improvements intended to take place in connection with existing investment programmes. In the case of Stagecoach this also includes committed service improvements in connection with growth already allocated in the existing Local Plan. This is an extraordinary omission.**
- **Represents a long list of interventions, the achievability and phasing/timescales of which is not explored at all. Confidence in some interventions being deliverable in timely manner or at all, is weak in some cases, again notably at Sharpness.**
- **No costs are assigned to any intervention, meaning that the impact of the transport interventions on both development viability and, by extension, financial as well as technical deliverability cannot be substantiated in any way at all.**

It is then followed by a section (Section 7) covering a summary of the findings of the traffic modelling work undertaken separately by Mott MacDonald, using an updated SATURN Strategic Transport (i.e. traffic) Model. We cover this briefly in the next section.

As such the Draft STS does little to move the evidence base beyond what was presented in Late 2019, and in effect succeeds only in capturing the promotional narrative for each of the proposed strategic allocation in a single place. It does not obviously steer the development strategy, or even the site-specific transport packages, but simply synthesises them.

The fact the Strategy remains in Draft at Regulation 19 stage is a serious difficulty. It represents a clear statement on the part of the Council that the transport evidence base is incomplete. At the regulation 19 stage, given the requirements incumbent on plan-makers

set in NPPF to prepare a suitable, up-to-date relevant and proportionate evidence base, to meet the justification test, this goes to the heart of the soundness of the plan.

Faced with this problem the Council has actually, quite remarkably, inserted an **entirely new Draft Policy DE11 into the plan**. This policy commits the Council to preparing mode-specific transport strategies covering the District, at an entirely inspecific and undetermined future stage. **This, in all meaningful respects, indicates that the Council itself recognises that there is no substantially defined transport strategy to support the plan at all.** This matter is left to be resolved post adoption. This is clearly entirely inappropriate.

Stroud Local Plan Traffic Modelling Forecasting Report (March 2021)

The modelling undertaken for the plan has been undertaken in two stages. The first work took place in 2018. The latest work by Mott Macdonald, presented with this consultation, was done late in 2020.

This has, at least allowed a broad high-level analysis to be undertaken, at a relatively early stage. Given the broad disposition of opportunities is so constrained, and the number of existing transport and highways corridors itself so limited, it is hardly a surprise that any model will tend to throw out broadly comparable results for most of the options modelled.

All that said, all the modelling exposes that:

- the highway network is operating broadly at and in many place above capacity
- pressure on the network increases
- there are significant capacity issues at junction 12 and junction 14 at the baseline position. M5 Junction 13 is less constrained as it is the only conventionally arranged junction which does not suffer from significant departures from standards, but will come under some pressure as growth on the scale envisaged comes forward.

The modelling has been undertaken with the Gloucestershire Strategic Traffic Model. This is a SATURN model, and this tool is limited in its predictive abilities:

- It is a traffic model, with very limited ability to assess how different kinds of interventions to improve sustainable travel choices might influence travel behaviour and suppress traffic growth. While the modeller can apply a nominal "suppression factor" this would need to be either a "global" reduction in traffic demand, which would fail to represent how the delivery of sustainable travel mitigations are likely to offer the greatest impact differentially over the network and at key nodes; or be externally derived from some kind of set of site- and corridor-specific assumptions overlaid in the model, the empirical basis for which is likely to be extremely limited. A combination of these approaches is used in this case.
- The model is about the strategic forecasting and assignment of trips over a broad area. It is most effective at predicting the broadest flows on the strategic network. It is not geared up to predicting local journeys – even though these represent both the largest number of trips and those that might be most amenable to diversion to walking, cycling and public transport. The DfT's National Travel Survey indicates that most car-borne journeys are less than 1.5 miles.
- The SATURN tool models the operation of junctions exceptionally crudely; as a strategic model it must arrive at a fairly high level estimate of the capacity of each major junction, but it is not a junction model that operates at a micro-scale to predict queuing and delays. As the report itself acknowledges at section 7.5.4 *"it is noted that SATURN models are not necessarily the ideal tool for accurately assessing queue lengths..."* It cannot be assumed that SATURN systematically over-estimates congestion, but equally it could not be relied upon to assess the likely conditions that would be encountered in actuality.

For a bus operator such as Stagecoach, the inability of SATURN to flag up the risks to bus operation arising from the plan strategy is a serious problem indeed.

The model outputs are in a real sense, quite abstract and conceptual, highlighting in the main the places where additional junction and highways capacity are likely to be warranted, to maintain free flow conditions for traffic. It is a tool to support "predict and provide", which have been employed for decades, and have resulted in exactly the unsustainable levels of car-dependency that are seen today.

Strategic model outputs do little to expose the likely effects of the plan strategy on bus operations.

Congestion in reality is a much more complex and nuanced matter than the model can address. Average delay is a meaningless concept since a scheduled bus service is generally presented, on any given journey, with greatly variable levels of delay day-to-day. This can arise from a range of factors: lack of wider network resilience, variable demand on the network across weekdays (that working from home trends are likely to exacerbate on Mondays and Fridays), and stochastic variability that increases as pressure on links and nodes on the network rises. To this should be added the impact of roadworks, including those directly related to bringing the development strategy forward.

In high-growth localities we are increasingly seeing the rolling impacts of a series of utilities reinforcement and connection works, alongside s278 works on a single corridor, which can cause delay and disruption to bus services for years.

Notwithstanding this, the outputs, that are broadly presented at fig. 5.3, show that the traffic demands on the network are aligned very closely with the main travel corridors. These are those that are the main routes taken by public transport corridors, or are alternative parallel routes that have been bypassed or replaced in the last 40 years. The A38 south of Whitminster between junction 13 and 14 of the M5 will be especially burdened by traffic generated in the large allocations towards the south of the District and in particular from that at Sharpness. This is hardly surprising.

We note that at 2040, based on modelling assumptions, there is therefore widespread pressure not just at key junctions, but on key links, both inside and outside built-up areas. **This suggests very strongly that, without a comprehensive series of bus priority measures, bus services will become practically inoperable.**

However the evidence base goes no further to start to examine the causes and effects of this delay in any more detail, much less the levels of mode shift to sustainable travel choices that would be needed just to address congestion issues, never mind carbon mitigation. In fact within the Stroud urban area in particular, the Report "washes its hands"; given that effective highways capacity improvements would be almost impossible to identify or deliver, even if they were considered to be appropriate. A good example is Bath Road near the town centre.

What is especially worrying is the admission at section 6.3.2 that the model cannot expect to pick up all the sites where delays are likely to worsen. The model and the package of mitigations focuses only on a more limited list of junctions: 29 of the main "Problem Locations" within the District and County, and another at junction 14 of the M5 just outside it. However many bus services will be affected not only by delays at these points but the cumulative delays arising in many more locations, which themselves could well be prone to disproportionate increases in variability of delay arising from wider pressure and disruption on the broad corridor of wider network.

As excellent examples, the B4008 through Stonehouse, and the B4070 Ebley Road and Westward Road linking Stonehouse and Stroud are subject to periodic pressure depending on condition on the M5 and A419 respectively. The model output makes plain that link capacity on the A419 and at the junctions on the M5 is likely to become exhausted; these issues would therefore become more serious and more chronic as traffic re-assigns, and adds pressure to a number of links and junctions that are less able to accommodate these demands.

Of the 30 Problem Locations we see that the Forecasting Report actually discounts the appropriateness of mitigations at Brookthorpe on the A4173 south east of Gloucester and on the B4008 approaching M5 junction 12 from the south, despite being significant and future bus corridors. At least as worrying is that in the Stonehouse and Stroud urban areas, there are no mitigation schemes proposed, despite existing high levels of congestion and delay, except at the A46/Dudbridge Hill junction south of the town centre.

None of the mitigations consider the potential for bus priority, or how far in effecting mitigation for general traffic, it precludes opportunity to achieve bus priority. Since the publication of the National Bus Strategy in April 2021, we doubt that this approach complies with national government policy, which **requires bus priority to be installed where space is available.**

The Preferred Mitigation Strategy at page 84 importantly focuses significant attention on adding capacity for general traffic on the A38 Movement corridor from Junction 13 of the M5 through Cross Keys and into the City of Gloucester. In so doing, traffic is facilitated but the need to make public transport more attractive is never considered. Quite why, the strategy believes that a 15% mode shift away from car use to public transport will be achievable by this approach is entirely opaque.

It is much more rational and effective to ration road capacity, at busy times, through queuing, and this is in effect the strategy pursued today by default both by national and local government. However without bus priority measures being effected to avoid causing further damage to the operation of bus services demands seamless bus priority, as **in serious congested conditions, the attractiveness of car use actually rises disproportionately over public transport use.** The reasons for this by now ought to be obvious to both the consultants and the Highways Authority:

- Cars can make much more direct trips to begin with, door to door. Even factoring en-route delays they benefit from a built in advantage over bus journeys even when a substitute trip is reasonably readily available.
- Buses are disproportionately hindered by congestion on any given journey as they cannot reassign route

- Delay becomes more unpredictable as network and link resilience declines. This means that reliable operation demands that services are scheduled towards “worst case” scenarios. When congestion is not encountered to the degree anticipated, buses have to wait time to avoid early running. While a motorist can take advantage of any benefit encountered, buses cannot. The scheduled journey times become increasingly uncompetitive and unattractive and this is seriously compounded by the apparent futility, on less congested days, of waiting time en-route.

Even global reduction of 40% of all journey to work as result of the entire workforce across all sectors and activities only travelling to work three days per week – an utterly fanciful scenario – would be unlikely to reduce traffic congestion by much on many weekdays if the majority of behaviour favours working from home on Mondays and Fridays as is the case today. In some localities we already require special bus timetables for Fridays, and for school holiday periods, because buses reach their destinations up to 20 minutes early than on most congested days. We foresee such conditions becoming necessary in the County in the fairly short term.

Achieving mode shift is therefore begged, but features nowhere in terms of very clearly-evidenced targets. Rather, the Report points back at what is a high level and **draft** Sustainable Transport Strategy as justification for reduction in traffic generation figures. These assumptions are set out at Section 6.2.1 of the Traffic Modelling Forecast Report For the site allocations, hypothetical mode shift targets are proposed, starting with a blanket 6% general reduction to account for internalisation and home working. On top of this, further site-specific assumptions are applied. This is set out at Appendix K of the Report.

The Report is candid that **this approach to applying mode shift assumptions is, to great extent, a highly interpretational and speculative exercise**: *"In developing this framework, there is a balance to be struck between the robustness of traffic generation reductions that can be achieved, along with the risks of under-assessing traffic impacts, and the strong focus on sustainable transport needed to address the Climate Emergency. There is a shared vision with the highways authorities that the STS needs to be ambitious and maximise investment in sustainable travel. GCC and Highways England consider that the STS mitigation scenario includes aspirational targets for mode shift and that the results should be considered in that context."* (para 6.2.1)

In other words, **the modelling assumptions recognise that there is an unavoidable need to secure substantial damping of single occupancy car journeys** in no small measure to avoid unacceptable congestion impacts, but are far from confident that these are achievable. We would add that while the local authorities and Highways England have agreed these factors, **no attempt has been made to involve us in the process**, to try and suggest from our extensive national experience, what might be robustly achievable, given the context of Stroud district and its interactions with adjacent areas, concerning which we have a good deal of knowledge.

Table 6.1 indicates that across the plan area, a **broad 15% reduction in car trips** is accepted to be the basis for moving the plan forward. This is the result of the impacts of sustainable transport measures on overall trip generation at the forecast year of 2040. This is a significant and no doubt challenging figure when set against the fact that car ownership and use in the District is among the highest in England, and the existing public transport offer, we concede, is limited in both network density, frequency and journey time across the plan area. Furthermore the combination of long travel distances and topography are likely to make very high levels of cycling challenging to achieve. The role of bus and coach in achieving these targets must surely be great.

Obviously, **we would welcome the recognition that an ambitious mode shift strategy must be pursued. We would say that this much is obvious**, without the need for a SATURN model. This “shared ambition” has not translated into the progression of any substantive work to identify means by which this could be credibly be delivered, also having regard to the interaction between the levels of general traffic on the network and the provision of sufficiently attractive alternatives. Immediate measures are already required to assist bus reliability and productivity in Ebley and Stroud, and around Cole Avenue and St Barnabas in Gloucester just outside the plan area. **There is no possibility of starting to greatly improve bus services if they will simply become entangled in ever-lengthening delays** – particularly on Tuesdays to Thursdays where it is already plain that working from home is going to be much less popular.

As we describe elsewhere, and as set out in draft Policy DEI1, the work to define mode-specific Transport Strategies in support of the plan will be done after the plan is adopted, at some point, funded somehow, by someone. The matter is “kicked down the road”. This is usual practice with local plans. However we do not consider it to be acceptable. **Since the plan aims at very little specific it requires an exceptionally high level of faith to believe that it will deliver anything specific.**

In essence, **the plan only starts to quantify, at a very high level, what outcomes and outputs need to be nominally achieved. It cannot in any meaningful sense demonstrate what measures are likely to be required, how this can be delivered by specific measures, and what those measures will cost.**

We are committed to work collaboratively, as closely as stakeholders will permit, in the short term, to defining the measures for public transport that we can confidently signal we believe would have the necessary impacts. Some of this work would align very well with activity that needs to take place to support a Gloucestershire Bus Service Improvement Plan, which must be produced on an ambitious timescale by April 2022, and before the Plan would face Examination in Public. This alignment of effort seems to us to be crucial to set the plan up to progress. However it presents very real resourcing challenges, for Stagecoach and no doubt for the Planning and Highways Authorities, and will demand an impressive level of "joined up thinking".

Positively, a strong shared vision for bus and coach in Stroud District and across the boundaries into Gloucester City and South Gloucestershire that will unlock Plan led-growth is highly likely to attract Government funding from DfT through the National Bus Strategy, to secure an early momentum of delivery of key schemes prior to 2025. We can see very clear opportunities that would offer high impact, for relatively low costs and very low delivery risks. It is essential that we move forward to identifying and defining these opportunities at the earliest possible opportunity.

As things stand, both the Traffic Forecasting report and the proposed preferred transport mitigation strategy fail to provide an adequate basis to define an appropriate set of interventions, or their costs, to support the achievement of the plans goals. The plan is therefore **insufficiently evidenced, cannot be shown to be effective in properly mitigating either delays or carbon, and is therefore unsound.**

Infrastructure Delivery Plan

Stagecoach notes that an Infrastructure Delivery Plan (IDP) has been prepared to support the plan in line with Planning Practice Guidance. This is dated June 2021.

The role of the IDP in establishing the costs and thus the economic burden of necessary infrastructure on proposed development, starting to apportion these cost burdens appropriately to developments requiring them, is absolutely pivotal in evidencing the deliverability of the plan, and thus the plan's effectiveness.

We note, somewhat to our surprise, that the IDP does not attempt to establish these costs in respect of transport. For some other cost, where a simple per dwelling pro-rate is established, it can do this by a simple process of arithmetic. The discrete lumpy nature of transport interventions, either for infrastructure or service enhancements, clearly is not at all amenable to this. As it is, large-scale transport infrastructure schemes – especially those involving the railway – are especially hard to put costs on.

The IDP therefore does not provide either a comprehensive list of infrastructure and service interventions required. Nor does it set out the expected delivery programme and cost. The Plan is therefore left, in respect of the delivery and deliverability of transport infrastructure, entirely "in limbo".

Stagecoach is rather surprised therefore, to note the conclusions of the IDP which among other things recommend that the Council prepares an Infrastructure Funding Statement in accordance with the PPG. The PPG Plan Making states "The government recommends that when preparing a plan strategic policy-making authorities use available evidence of infrastructure requirements to prepare an Infrastructure Funding Statement. This should set out the anticipated funding from developer contributions, and the choices local authorities have made about how these contributions will be used. At examination this can be used to demonstrate the delivery of infrastructure throughout the plan-period." (Paragraph: 059 Reference ID: 61-059-20190315)

This document has not yet been prepared, so there is no justification for the policy requirements and consequently this undermines the delivery of the Plan).

Whilst there is an IDP presented that purports to support the Plan, it can only be described as incomplete in a number of crucial areas, especially transport. There is no Infrastructure Funding Statement at all. The plan is thus neither demonstrably deliverable nor properly evidenced on important matters of viability. The plan on these grounds too, has to be considered unsound.

The Settlement Role and Function Study Update (2019)

The transport evidence base ought to be a key contributory element of the Sustainability Appraisal. An incomplete, inaccurate or otherwise distorted transport evidence base will unavoidably have the effect of distorting the Sustainability Appraisal process itself.

If the evidence base is as incomplete and inconsistent as it clearly is in this case, there is a very high likelihood indeed that the Sustainability Appraisal is challengeable today, and will need substantial rework at some point between now, and the time the plan could be found sound. This work would have to take place during the Examination process.

While we are aware this is not unprecedented, this is something that the Examination process is not in any way intended to facilitate. We would be very concerned that Stroud District Council were prepared to take such a risk, especially in the light of experiences elsewhere in the region over the last three years.

Stagecoach sees no need at this stage to replicate the work of other respondents who will no doubt seek to interrogate and test the robustness and consistency of the Sustainability Appraisal in great detail. We consider that the problem with the transport evidence base, in and of themselves, are sufficiently grave to warrant sober thought.

We do wish, nevertheless to highlight some significant issues and inconsistencies in the SA, arising from other important aspects of the evidence base.

Of these problems, the biggest in our view arises from the way that settlements generally, and in the south of the District in particular have been treated in the **Settlement Role and Function Study Update** (SRFSU) published in May 2019.

The Plan and its Sustainability Appraisal draws deeply upon evidence in the SRFSU, that drives the categorisation of settlements, which is then expressed in Core Policy CP3; and that to a great extent defines the Local Plan Spatial Strategy, and thus the approach to site allocations.

For a start, in assessing the ease of access to wider-distributed services and facilities not provided within many smaller **settlements we are far from clear how the existing and the potential usefulness and relevance of sustainable choices to meet day to day travel needs drives the evaluation of accessibility in the SRFSU, and then the SA.** These matters are covered in Section 3 of the SRFSU.

What is meant by "good", when travel choices to access employment or higher-level services, leisure and retail elsewhere is considered? This is a term used to describe most of the Tier 2 settlements, which are seen as appropriate to accommodate a modest level of growth both in the current Local Plan and the emerging development strategy. This tier includes settlements that, in many contexts, would be rather more likely to be described as "substantial villages" rather than "market towns".

Whatever such settlements have in common in terms of the availability of services and facilities, it should be stressed that the level of existing and potential public transport provision is widely divergent. Only Nailsworth and, shortly, Hunts Grove, offer hourly or better bus service frequency to the nearest higher-order centres. By contrast, the public transport choices available, or credibly available at a number of Tier 3a settlements is greatly higher than this. As diverse a range of settlements as Brimscombe, Eastington, Hardwicke, Kings Stanley, Leonard Stanley, Painswick, Upton St Leonards, Whitehill and Whitminster have at least an hourly bus service on offer 6 days per week. Often these run to not just one higher-order destination within convenient journey time, but two or even more.

It is ironic, that most **Tier 2** settlements are so poorly served by public transport. This says, in our view, a great deal about the **fundamental inaccessibility of these places**. The lack of bus services in these settlements reflects, in the main, both their relative remoteness from higher-order centres (helping to maintain local shopping facilities to some degree) but also their distance from the main movement corridors between the exiting larger towns, and destinations beyond the District.

Looking at the accessibility criteria in Section 3 of the SRFSU, the transport offer makes no reference to buses or local public transport **at all**. The presence of a rail station (of which there are only three in the District, all serving only serving longer-distance inter-urban travel demands) is one of only two transport-related criteria. The other is the presence of a petrol filling station. This is properly a retail function; especially since fuel vending in the UK has long been loss-making, and is generally tied to convenience retail or larger foodstore provision.

Looked at in these terms, the **Plan strategy, in what is a very rural district with no very large settlements, has been built entirely without regard to the even the current, much less the**

potential availability of public transport choices. This is even more alarming when the opportunities to grow the small number of largest settlements, where these choices are most likely already to exist, is so heavily constrained, making it essential to look at “the next tiers down”.

Most of the Tier 2 settlements benefit only from bus services subsidised by Gloucestershire County Council. These are “policy-driven” not demand-driven service designs. They are aimed at providing a basic level of service to essential users only: those who cannot drive. As the table before makes plain, this typically means a bus journey will take upwards of 40 minutes to the nearest town with perhaps 3-6 departures per day. This is not a credible choice to anyone, except those who are somehow unable to drive, also having a great deal of time on their hands.

To assist the Council, we set out in the table below the current level of bus service provision in all the Tier 2 and Tier 3a settlements

Table 3.1: Comparative Bus service availability and quality for Tier 2 and Tier 3a settlements

Settlement	SRFSU/Policy Tier	Service frequency	Destination	Journey time	Commercial?
Berkeley	Tier 2	6/day	Bristol	48 mins	No
			Dursley	41 mins	
Minchinhampton	Tier 2	5/day	Cirencester	Varies	No
			Stroud	18 mins	
Nailsworth	Tier 2	30 mins	Stroud	18 mins	Yes
Painswick	Tier 2	60 mins	Cheltenham	41 mins	Yes
			Stroud	9 mins	
Wotton under Edge	Tier 2	120 mins	Dursley	24 mins	No; potential for substantial improvement
		120 mins	Thornbury	28 mins	
		60 mins	Yate	50 mins	
Bussage (Manor Village)	Tier 3a	60 mins	Stroud	20 mins	Yes
Brimscombe	Tier 3a	Up to 3/hr	Stroud	6 mins	Yes
Chalford	Tier 3a	4/day	Cirencester	19 mins	Yes
			Stroud	12 mins	
Eastington	Tier 3a	60 mins	Dursley	17 mins	Yes
			Stroud	32 mins	
Frampton on Severn	Tier 3a	1/day	Gloucester	53 mins	No
Hardwicke	Tier 3a	12 mins	Gloucester	23 mins	Yes
		30 mins	Gloucester	20 mins	
		30 mins	Stonehouse	15 mins	
Kings/Leonard Stanley	Tier 3a	60 mins	Stroud	14 mins	Yes
		60 mins	Stonehouse	16 mins	
Kingswood	Tier 3a	120 mins	Thornbury	25 mins	No, potential for substantial improvement.
		120 mins	Yate	46 mins	

Newtown and Sharpness	Tier 3a	6/day	Dursley Bristol	32 mins 51 mins	No
Woodchester	Tier 3a	30 mins	Stroud Nailsworth	11 mins 8 mins	Yes
Whitminster	Tier 3a	120 mins*	Dursley Gloucester	22 mins 29 mins	No, high potential for further improvement including in the longer term.

- From September 2021 Whitminster will be served every 30 minutes

The assessment summary in Table 5 of section 3, with its scoring system, shows just how crude the methodology is. In fact, it becomes plain that **rather than looking at settlements, the scoring is evaluation the endowment of the civil parish**: in a rural area, a somewhat different geographic unit, covering a substantial rural hinterland around each settlement. **This has no regard to whether the facility concerned is reasonably or conveniently accessible from the settlement** with the same name, except by motorised means.

This leads to some significant distortions: most egregious being that Berkeley is considered to have a FE College (the UTC at the former power station about 2 miles away), while Kingswood, which has the Katherine Lady Berkeley Secondary School and 6th form directly adjacent to the village, is not offered the benefit of this in the assessment because it is not within the Parish boundary.

Then too there is the somewhat spurious distinction between parishes within larger urban or settlement groupings: Brimscombe and Cainscross, for example, which are an integral part of the Stroud urban area. Another example of the spurious distinction this throws up is Kings Stanley and Leonard Stanley which are directly adjoining one another and functionally operate as one, certainly as far as service delivery and viability are concerned. It is hardly a surprise that Leonard Stanley has no local shop within its boundary. They are treated in the assessment as separate discrete settlements, that have no functional relationship to one another. The SRFSU, like its 2014 predecessor, is actually geographically short-sighted, to the point of near-blindness.

The accessibility matrix in Table 6 is similarly crude, which in terms of its results, demonstrates a marked skew towards accessibility on foot to local facilities. This merely reinforces, by a somewhat circular logic, the categorisation of self-containment for local services and little else, not accessibility to facilities and services "elsewhere". Indeed, looking at this table, almost all settlements are apparently well connected by foot and bus to a full range of local services. Nor is it at all clear how far the safety of walking routes and the frequency of the bus service, and its hours of operation, are a factor that has been picked up in the automated process. Presumably the existence of a line on the map connecting two places is sufficient. Looking at the table it is hard to draw a clear categorisation at all, so "good" is sustainable accessibility alleged to be across much of the District. The use of some effusive adjectives to describe most of the categories is a notable and marked weakness of all this work.

Extraordinarily car-dependent places, with virtually no facilities credibly available within easy reach without the use of the car, are described as having "fair" levels of access. This is true - but only by car.

We have significant problems with the factual accuracy of some of the SRFSU data and scoring.

Whitminster is seen as "poor" while Berkeley, Sharpness and Newtown are seen as "good". Reaching a library or Minor Injury Unit within 30 minutes of any the latter by sustainable means looks to be practically impossible. By contrast, it might take a little more than 30 minutes to reach a General Hospital from Whitminster on service 60 (29 minutes journey time to the Gloucester Bus Hub within a short walk of the Royal Gloucestershire Infirmary) but even factoring a walk in, the Vale Community Hospital in Dursley is probably actually achievable, just, within that time. It is certainly the case that Tesco or Aldi in Quedgeley, is reachable within 15 minutes of much of Whitminster on the bus, even factoring a walk in to the stop. Whitminster seems to have been substantially and incomprehensible under-rated by the study, even on the basis of the current service offer, which as we have made plain at all stages of plan preparation, was due for substantial improvement. This is to be implemented from September 2021.

Berkeley, Sharpness and Newtown seem to have been systematically over-rated.

We agree with the statement in the document that the score for Newtown and Sharpness is "surprising" and suggests, along with **a wide variety of other anomalies discussed in Section 3.26-3.30, that the methodology actually obfuscates rather than exposes the important distinctions in accessibility. So concerned are we with the methodology, that we have no confidence whatever in the SRFSU, with regards to sustainable accessibility.**

The ready availability of secondary education within walking or at least safe cycling distance, the absence of which creates both a statutory budget pressure on the County Council as well as driving a great deal of peak demand on the highways network seems to be considered fairly immaterial in forming judgments about where development might be focused. We would point to the judgments made about Sharpness and Newtown, for example, and contrast those with judgments made about Whitminster and Kingswood; or at the higher tier 2, between Berkeley (remarkably, considered to be a "market town") and Wotton under Edge or Cam.

Perhaps the most accurate and telling statement is that in paragraph 3.26: *"It is notable that almost all settlements are able to access the key (day-to-day) services and facilities within 15 minutes by car... the contrast between drive times and walking/public transport times highlights how car-reliant many of our (rural) communities are."* When one considers that residents will be seeking a wide range of goods, services and amenities, not just day-to-day ones, and not just the level of choices that may be offered at the nearest facility, we would suggest the wider car dependence of all the District's settlements - including Stroud and Dursley - is not hard to understand.

This shows how vital it is that the spatial development strategy of the Plan robustly and clearly establishes where the potential to radically improve sustainable transport choices in the short to medium term actually lies, for existing residents as well as future one.

Evidence of Deliverability of Strategic Public Transport interventions – the implications for progressing the Stroud Local Plan

In advancing the plan to this stage with highly inconsistent and inadequate evidence about the deliverability of key transport interventions, Stroud District Council is following a path that has been trodden all-too-often. The risks to the examination of the plan seem to us to be plain. We urge the Council to consider this very soberly.

Several precedent situations exist that are remarkably closely analogous to the situation in Stroud. Of these, among the most recent, is that in Uttlesford District, North West Essex. While also hosting Stansted Airport, like Stroud, this is a largely rural district with no large towns, crossed by a parallel motorway and rail corridor, but with very limited access available to either. It also has to respond to very high level of objectively-assessed growth. Public transport frequencies and connectivity is, likewise, limited: reflecting the context.

The development strategy advanced for Uttlesford understandably sought to concentrate development in several substantial new settlements in entirely new locations, all relatively remote from existing provision. This demanded a highly ambitious approach, in this case involving express bus rapid transit corridors each running at very high frequencies, and enjoying a high degree of segregation. Incidentally, the powers to deliver such a strategy much more securely lie within the powers of local government and the development sector, unlike a rail-based solution, where they do not.

Nevertheless, the Inspection of the Local Plan was terminated prematurely, on the basis that the Inspectors were unconvinced of the deliverability of the plan strategy related to large-scale new settlements, and of the transport measures that underpinned them in particular.

In a letter written in advance of opening the EiP in June 2019 (ED10) the Inspectors flagged up a set of serious concerns in outline about the Plan's evidence base that had been raised by a number of key representatives at Reg 19 stage. It was made clear that the Examination process is not intended to allow a LPA to finalise its evidence or introduce significant alterations to a plan.

During the course of the Examination the LPA made repeated attempts to amend augment and alter aspects of the evidence base. Much material was submitted without any opportunity for participants to comment.

On 10th Jan 2020 following stage 1 of the Examination, the Inspectors wrote to the Council (Examination Ref. ED 82) making plain that that *"it is this (Local Plan) examination which must determine whether the Garden Community proposals are properly justified and realistically developable. This is of major importance in this case given the large scale and long-term nature of the*

*Garden Community developments, combined with the fact that they would be the primary source of housing in the district for the next 30 to 40 years.” (para 8) They also underlined that “**the examination process is not intended to allow the Council to carry out major changes to the plan or to complete the preparation of its evidence base.**” (para 126).*

Paragraphs 38 ff. of that letter considered the transport matters involved in providing a new rapid transit offer in more depth. The insufficient evidence regarding costs, phasing and delivery of the infrastructure were highlighted, along with the consequential impacts on development viability and the housing trajectory. We would stress that all these aspects would have been under greater direct control of the stakeholders in the UDLP than the rail-based interventions on which Sharpness relies. Following the Inspectors’ recommendations, the plan was withdrawn shortly afterwards.

Unlike in Uttlesford, the Stroud Local Plan strategy does not wholly rely on such new settlements, nor a series of complex public transport infrastructure enhancements, for the bulk of its deliverability.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Stagecoach considers that the broader deficiencies in the evidence base, and the particular problems that arise in evidencing the appropriateness of the Sharpness proposals in particular, warrant a very serious re-think.

It is clearly necessary to complete the transport evidence base, and this work must involve transport infrastructure providers and operators working collaboratively with the Council, County Council and promoters, including those of key omission sites that could credibly be included in the plan as they demonstrably align with the plan’s vision strategic objectives and over-arching spatial strategy which we believe to be essentially sound.

This work would properly define, among other things, the Transport Strategy in support of the Plan. It would be informed by and reinforce other strategies, including those of Highways England across Roads Period 2 (2020-2025) and Roads Period 3 (2025-2030). It will need to have regard, in respect of rail-related initiatives, Network Rail’s imminent CMSP Study from the Birmingham to Bristol line, as well as the existing Gloucestershire Rail Investment Plan.

Equally, it would align with and reinforce the County Council’s Local Transport Plan Review. Alongside this, Gloucestershire will be preparing a Bus Service Improvement Plan collaboratively with ourselves and smaller operators, in support of the Government’s National Bus Strategy. This is on an accelerated timescale, and the broad vision and strategy for bus and coach infrastructure already emerging in LTP, and our own clear vision for bus in the County and Stroud District mean momentum already exists. Irrespective, NPPF makes clear that the ongoing collaborative input of transport operators, not least ourselves, who are best positioned to inform what interventions are likely to be both most effective in achieving the plans Strategic Objectives, and enduring, is essential to inform a sound plan.

Clear cost budgets and apportionment between specific developments, allowing properly informed decisions to be taken based on both the technical and financial deliverability of transport interventions, as well as their likely impacts, can then be included both in the Infrastructure delivery Plan and the supporting Infrastructure Funding Statement.

We would also emphasise that we expect as business to be a very significant investor in bus service improvements in the District, and the correct policy environment and well-defined investment plans for public transport priority and service improvement can be reliably expected to leverage increased investment from Stagecoach, supporting not only the plan and the development strategy but the entire District.

We have serious concerns about the rigour and objectivity of the Settlement Role and Function Study Update. We believe the matters we raise are amenable and capable of being addressed on a quite short timescale. This in our view likely to suggest some significant opportunities to better align the allocation of sites both small and large, with the plan’s objectives and spatial strategy, and also help support a more robust delivery profile.

The plan is entirely lacking any analysis of carbon impact. This is serious, and might on its own be considered to fatally undermine the evidence base and soundness of the plan, given the primacy of this agenda nationally and in the plan's own policy suite at DCP1. To the extent that the spatial strategy and its carbon impact is, to an overwhelming extent, a function of patterns of transport and movement, this work should be aligned with reinforcement of the transport evidence base. In many ways it ought to lead it, rather than follow, as this must make clear from first principles where the plan can direct development to reduce travel distances, and maximise the contribution of active travel, and by short extension, those areas where public transport improvements are both likely to be more cost-effective to achieve, and secure greatest like-for-like impacts.

We do recognise that remedying serious omissions and deficiencies in the evidence base is highly likely to both confirm the validity of the SOs and the spatial strategy centred around the Movement corridors.

However, we also consider it all-but-certain from the wider evidence already available, including that we have advanced, that the evidence base could not justify the allocation of new settlement on any highly remote, physically disjointed site away from any established movement corridor, as a strategic allocation. Thus, the plan would be likely to need to consider sustainable and deliverable alternatives to the proposed allocation at PS36, Sharpness Vale in particular.

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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Yes

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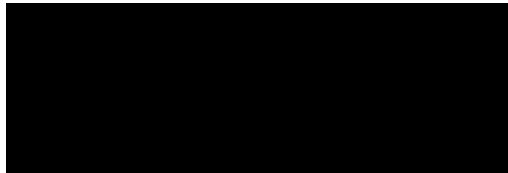
Stagecoach West is the largest public transport provider in the Plan area. NPPF makes plan that transport operators should be fully engaged in the preparation of the plan. Alone among the public transport stakeholder group, we are the only ones to date to have fully and duly participated in the plan-making process. Sadly, this has not been through ongoing collaboration with the LPA, as NPPF requires, who has rather elected to progress its plan rather in isolation.

The problems and deficiencies that we have identified in the transport evidence base and the justification of the plan, are serious and go to the heart of the soundness of the Plan.

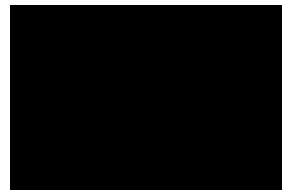
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Date:



Part B – Please use a separate sheet for each representation

Name of Organisation: **Stagecoach West**

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="Y"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="N"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="Y"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Stagecoach West considers that the “40 Key Issues” effectively and fully cover the range and complexity of the matters that the Local Plan can and should seek to address. This aspect of the Plan is sound. It establishes well the basis the broad priorities that need to be pursued, and the specific choices that need to be made that steer pattern of development in a sustainable manner across the District.

We would highlight the first two:

- ***Moving the District towards becoming Carbon Neutral by 2030, whilst adapting to the impacts of climate change and providing resilience for the future.***

- **Ensuring new development is located in the right place, supported by the right services and infrastructure to create sustainable development, including by:**
 - *concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure;*
 - *creating **new sustainable communities at locations where development can transform existing access to services and infrastructure;***
 - *concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth.*

The mutually reinforcing relationships between spatial patterns of development and activity, movement and its energy and carbon intensity mean that sustainable development can only be properly addressed through the Local Plan process.

Retrofitting sustainable transport solutions and interventions to an otherwise pre-determined development strategy, that has not had proper regard to a deep consideration of existing and deliverable sustainable transport provision, can never properly minimise travel distances, the need to travel and maximise the use of sustainable low-energy and low-carbon modes.

The **Priorities that follow from the issues do not, consistently conform with either NPPF, the spatial strategy or the wider policy suite in the Plan.** The second priority is framed aspatially. In the context of transport and accessibility, this is not at all appropriate, as ***it legitimises steering development anywhere at all in the District,*** as long as that development *“transforms accessibility”*. This is out of conformity with NPPF paragraph 101-102, which requires local plans to be steered by transport considerations from the earliest possible stage. In fact **this language is actually perverse: it would tend to suggest that the weaker the existing level of accessibility of a locality, the more appropriate major development would be,** as by definition investment to support it would *“transform accessibility”*.

While certainly the plan should look to leverage patterns of development to secure wider benefits to sustainable accessibility and the relevance and attractiveness of public transport, walking and cycling, this is a very different thing indeed, as it is one that demands a very close alignment with existing and credibly deliverable high quality sustainable travel infrastructure and services.

It is also out of conformity with policy elsewhere in the plan, at CP13 and EI12, that explicitly steer development towards sustainable transport provision. The statement regarding new settlements at this point, seeks implicitly to require the opposite: in effect to steer investment in sustainable transport to the new settlement irrespective of its existing endowment. As we say elsewhere, NPPF, the plans Strategic Objectives and the rest of the policy suite in the plan implicitly mandates transit-oriented development, not *“development oriented transit”*.

It is clear to us that this language has been inserted in this point to retroactively justify the allocation of PS36 Sharpness Vale. As such it is an unacceptable and unjustified distortion of the plan.

(Continue on a separate sheet /expand box if necessary)

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Stagecoach considers that the Plan Priorities must be simply modified as follows to ensure the plan logic and priorities secure the Strategic objectives and align with national policy expressed in NPPF at paragraph 102-103:

- *Ensuring new development is located in the right place, supported by the right services and infrastructure to create sustainable development, including by:*
 - *concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure;*
 - *creating new sustainable communities at locations where development can ~~transform~~ **leverage and augment** existing access to services and infrastructure, **focusing primarily on sustainable modes;***
 - *concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth.*

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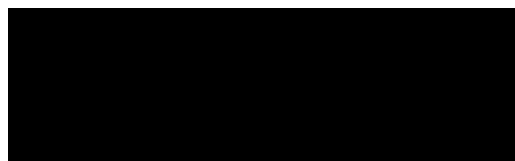
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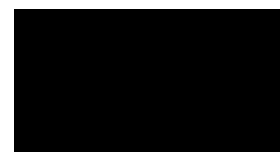
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Date:



Part B – Please use a separate sheet for each representation

Name or Organisation: **Stagecoach West**

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4.(2) Sound	Yes	<input type="text" value="Y"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="Y"/>	No	<input type="text"/>

Please tick as appropriate

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Stagecoach welcomes and **supports the Strategic Objectives.**

These align entirely with the expectations of NPPF and its overarching definition of the key tenets of sustainable development.

We especially note and welcome SO4 Transport and Travel, which sets an ambition to reduce reliance on carbon intensive forms of mobility; and alternatives to private car use, with better and more integrated alternatives.

Equally we would emphasise the importance of SO5 Climate Change and Environmental limits, given the national legally binding trajectory to zero-carbon by 2050, and the Councils' own declaration of climate emergency and carbon neutrality by 2024. This also recognises the crucial interaction between land-use patterns of development and transport demands and behaviour, and accordingly this SO means the Plan will achieve this Objective by **"Supporting a pattern**

of development that prioritises the use of sustainable modes of transport.”

We consider the importance of this is establishing a more sustainable future for Stroud District cannot be underestimated, not least because the way the Plan achieves this can and should also be expected to support much improved travel choices for the vast majority of existing residents and businesses.

(Continue on a separate sheet /expand box if necessary)

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Not applicable

(Continue on a separate sheet /expand box if necessary)

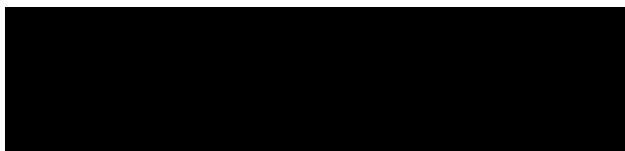
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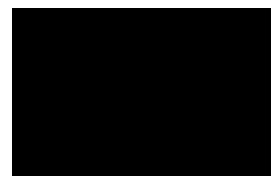
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Part B – Please use a separate sheet for each representation

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Paragraph h	2.4.5	Policy	New Settlement s	Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	Y	No	
4.(2) Sound	Yes		No	N
4 (3) Complies with the Duty to co-operate	Yes	Y	No	

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Stagecoach recognises that the development needs of the plan area cannot be met, in alignment with and satisfying the definitions of sustainable development within NPPF and its full range of requirements, simply within and by expanding the larger existing settlements.

We have been clear from the earliest stages of plan genesis, that the constraints and opportunities for development in Stroud District are such that new

settlements are in our view and necessary and entirely appropriate element of a sustainable development strategy for Stroud District over the Plan period.

We have been equally clear that the siting of new settlements, to be sustainable and to meet NPPF policy and the plans Strategic objectives SO4 and SO5, needs to ensure that these are directly on existing and demonstrably deliverable new high quality public transport corridors. In effect the **plan can and must use the opportunity to select entirely new settlement sites as a key means to achieve "transit-oriented development"**. Development is steered to these corridors and nodes: as SO5 actually requires. These corridors have been clearly identified in in the County Council's Draft Local Transport Plan Review, and transport evidence base for the plan, and indeed are begged.

We would add that there should be an emphasis on steering new settlements to existing high quality public transport corridor and nodes – such as the railway station at Cam, one of just two in the District. This allows immediate access to existing services that are reasonably relevant for the first residents, while then creating the additional density of demand that justifies early frequency and capacity improvements.

In most respects, the development strategy follows these principles quite closely.

However, we are alarmed that a second new settlement, the largest in the Plan at Shrapness Vale (PS36) departs entirely from these principles, and fails to align with and support achievement of the plan's strategic objectives. Sharpness Vale (and the neighbouring existing allocation at Sharpness Docks) is on no existing transport corridor – and far from existing public transport services and nodes. It is also far distant from the A38 which we have signalled is a route that could accommodate a new north-south bus/coach corridor linking a number of existing important nodes on a single, simple, direct route, to unlock density of demand in a relatively sparsely populated District.

The identification of a new settlement at **Sharpness** requires entirely new transport links and services to be provided. This is a strategy that is the reverse of that required to meet SO5: it is plainly **"development-oriented transit"**. However the volumes of demand required to support what in effect are new bespoke public transport services are so great they are almost impossible to achieve for a single development, even one on the scale of that proposed. The sheer remoteness of the site makes these challenge multiple times more difficult than an option closer to key destinations. As a result the fundamental and inescapable laws of both economics and human behaviour combine to mean that these services simply cannot be sustained, and excessive ongoing level of subsidy relative to level of use would no doubt make it impossible to justify their ongoing support.

We elaborate and substantiate further our ongoing serious concerns in representations on the proposals at PS36. We consider these proposals re inconsistent with NPPF and the Plan Strategy and are improperly and inadequately evidenced. **Thus in this very important regard the plan is not justified, out of conformity with NPPF and is therefore unsound.**

We consider that it is evident that other new settlement options exist that demonstrably align much more closely with the plan strategy.

The Council itself consulted formally on two of these in late 2020: at Moreton Valence and East of Whitminster. Both are much better placed to support a

reduction in the need to travel long distances to off-site destinations; support much higher levels of cycling to local destinations, and, most importantly from our perspective, benefit from both existing bus services that will have commenced along the A38 between Stonehouse and Quedgley by the end of 2021; and catalyse an increase in the frequency of the services, entirely in accordance with the Draft Sustainable Transport Strategy.

Stagecoach has signalled formally to the Council that it considers the option East of Whitminster to be substantially better in all material respects to that at Moreton Valence, and in respect of the ability to secure the highest level of public transport provision, as well as a possible inter-modal hub near M5 junction 13, serving longer distance coach services on the M5, as well as local routes.

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Stagecoach considers that the Council should take steps, in line with the completion of key elements of the transport and carbon evidence bases, to ensure that all credible new settlement proposals are tested against their ability to align with the plans Strategic Objectives, and in particular that they demonstrate that they conform with the hierarchy of travel measures set out in NPPF at paragraphs 102-103, and in conformity with the draft plan at draft policies DCP1, CP13, and EI12, in that they:

- first, reduce the need to travel,
- second, minimise distances of travel to key existing population and employment centres, which will also tend to support higher levels service for cycling infrastructure and bus services and thus support much higher shares for those modes.
- maximise the ability to benefit from and where appropriate and necessary reinforce the infrastructure and services that will support high levels of public transport both from the site, but from all communities on the line of the corridor.

We have no doubt that such an exercise would be all-but-bound to demonstrate that at least one superior much more sustainable new settlement option exists to meet the development needs of the plan area, in a relatively unconstrained location.

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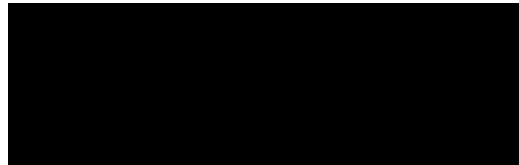
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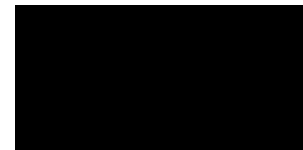
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Stagecoach notes that the Council has set the urgent and complete elimination of carbon emissions as the principal and foremost policy objective in its plan. This urgency aligns with the national legally binding target date of 2050, which is generally acknowledged to be extremely challenging.

The Council has unilaterally decided that the District should have entirely mitigated carbon emissions by 2030. Whether or not this is achievable, we agree that the Local Plan is by far the most important of the tools available to the Council to directly secure this objective. We therefore endorse fully the positioning of the issue in the Plan. It is essential that the development strategy and the full policy suite in the Plan aligns with a clear focus on achieving this objective.

We therefore support the introduction of new policy DCP1. We also consider the policy is clear in setting both intent and actions that will be required in terms of the siting and design of development in the District.

In particular we note and endorse the clear hierarchical approach to securing carbon-neutrality through the Plan. The location of development, and the influence of this on need to travel, and distance of travel, is the first and most important criterion, followed then to secure sustainable modes as first, and most attractive and relevant choices for journeys. Given that Government has shown in its March 2020 Green Paper "Decarbonising Transport: Setting the Challenge" that domestic transport accounts for a third of all emissions, and that absolutely and proportionately these are expected to rise, only by setting a laser-like and determined focus that the development strategy and development proposals achieve these objectives can the Strategic Objectives be secured.

Stagecoach therefore **supports Draft Policy DCP1.**

In particular we note and endorse the language of the initial two points that should be considered to represent the two foremost driving principles behind both the development strategy and development proposals:

"Stroud District will become Carbon Neutral by 2030 ahead of the Government target of Net Zero Carbon 2050.

*To support this target **all new development must be:***

- ***located where the form and mix of development itself or proximity to essential services and facilities minimises the need to travel;***
- ***designed to discourage the use of the private car, irrespective of fuel source, by prioritising in order of importance: walking, cycling and public transport to deliver the highest possible share of trips by the most sustainable travel modes;...***

Evidently, not only the development strategy, but specific allocations and the wider policy suite should align with this policy if the Plan is to be sound and effective.

We would also stress that achieving the "**highest possible**" mode share for bus is entirely dependent first on the location of development, (and its ability to synergise with existing public transport demand provision) and only secondarily, on its urban design. This outcome is impossible to achieve by treating each development proposal as an "island", looking to meet only its own travel demands through measures that operate on a largely stand-alone basis.

Attractive and internally well-structured developments are necessary, but they are never by that fact alone sustainable in transport terms: a major problem for many "Garden Settlement" proposals nationally, for which these criteria are apparently seen as a suitable proxy for rational and sustainable development location.

The nature of the District and both existing and potential core bus and coach routes is such that the opportunities available to the Council to achieve this central policy objective will be relatively limited. For this reason, a very focused approach on sustainable movement corridors, as well as journey distances to key destinations using them, will be of the essence in securing a sound sustainable development strategy.

We see no conflict here whatever, with the need to positively plan to meet the development needs of the District. In fact, on the contrary, the development strategy that properly achieves the goals of DCP1 will certainly serve to create the density of demand and improved infrastructure that would transform the attractiveness and relevance of cycling and public transport in particular, for the majority of existing residents especially those who live in the District's largest 10 or 12 largest settlements.

This of course, is the reason for the comments made elsewhere in the evidence base and supporting material, such as paragraph 3.35 of the Settlement Role and Function Study Update (2018):

"Careful planning should aim to:

- ***Avoid sporadic development that offers little to sustain or boost existing communities.***
- ***Focus growth towards those settlements that have better access to services, facilities and infrastructure.***
- ...
- ***Support some growth in locations where there is the best chance to bring about coordinated improvements to accessibility, connectivity and public transport as a direct result of development.***
- ...
- ***Establish appropriate limitation on the amount, scale and nature of any development at inaccessible lower tier settlements."***

(Continue on a separate sheet /expand box if necessary)

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Not applicable

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Name or Organisation: **Stagecoach West**

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Stagecoach welcomes and **strongly supports the principles set out at Policy CP5**. These are critical to ensure that the approach to site master planning and design supports public transport achieving the highest possible relevance and impact.

I particular we applaud that

"Strategic sites will:

- 1. Be built at an appropriate density that is acceptable in townscape, local environment, character and amenity terms*
- 2. ...*
- 3. Be readily accessible by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities; and will contribute towards the provision of new sustainable transport infrastructure to serve the area, in seeking to minimise the number and distansingle purpose journeys by private cars*
- 4. Have a layout, access, parking, landscaping and community facilities in accordance with an approved indicative masterplan*
- 5. Be located to achieve a sustainable form of development and/or support regeneration.*

Development proposals should incorporate a negotiated design code/framework."

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Policy CP13 refers to **Demand management and sustainable travel measures.**

In many respects, the policy overlaps in scope with draft Delivery Policy EI12 "Promoting transport choice and accessibility". As such they duplicate each other materially, and in other respects a simpler and more succinct approach, as mandated by NPPF, would see these policies merged. A single policy would conjoin priorities that policy is setting, with the requirements sought meet these priorities, and with a clear policy mandate to ensure that these can and will be delivered. As drafted, the policy expresses little more than aspirations. As such the policy is **ineffective and thus unsound.**

The policy as drafted is weak and fails to capture the need to deliver services improvements, as well as developer funding for the full range of transport initiatives. A clear policy hook is needed in both respects, to support both the Council as LPA and the County council as Local Transport and Highways Authority in securing adequate developer funding for transport measures.

In particular it makes no mention of the need to secure significant and substantial improvements to transport **services** as well as infrastructure, despite the fact that the transport evidence base, and developers' promotional strategies all recognise that substantial augmentation of bus and coach services will be required, to address the limited network coverage in parts of the plan area and limited frequencies and hours of operation that are a broader deficiency even on some of the Sustainable Mobility Corridors.

Given that the Plan and the transport evidence base is clear that a substantial shift towards sustainable modes is needed, Policy CP13 also need to make explicit that investment in sustainable transport measures should be pursued first, before investment in general highway capacity is considered. This is a very substantial shift in the emphasis of planning policy in the District, and indeed in the wider County, and it demands a very much stronger policy steer, to direct all stakeholders to that end.

The **shift from the presumption that proposals should seek to accommodate traffic generation first, as the draft policy implies, is a huge change in approach. For this to be effective, it will require a different kind of evidential rigour**, that will need to go as far as possible to satisfy the County as Highways Authority and, where necessary, Highways England, that the approach take to sustainable transport will be effective in damping demand sufficiently to obviate the need for substantial capacity interventions to accommodate additional traffic. The nature of existing issues means that such an approach is certain to require delivery of a shift in behaviour from existing travellers on busy corridors and through constrained parts of the network ("mode shift"), as these existing volumes are likely to vastly exceed the trip generation from the development itself. This arithmetic "gearing" makes it much more credibly achievable to achieve material but modest mode shift from existing motorists, than attempt to secure virtually car-free travel behaviour from new ones, to address constrained network capacity. This mechanism is sometimes referred to as "trip banking".

Policy also needs to allow the plan to be both effective and more flexible in, **securing appropriate developer contributions** for transport proposals that will be necessary to support significant proposals, both within and potentially outside the scope of the proposed allocations. We consider that setting this requirement alongside the rationale for it in a single policy, best justifies such requirements, not least in the sense of the Community Infrastructure Regulations 2010 (as amended). As the Draft SDS makes plain, this will clearly involve both capital investments in infrastructure, or revenue support sums to help "pump prime" bus service interventions in particular. Without this being properly signalled in policy, explicitly and directly, the ability to secure such funding is seriously compromised. In a plan-led system, it is evidently not sufficient to rely on text in the explanatory memoranda, or worse still, material outwith the Local Plan entirely such as the IDP of Local Transport Plan, to secure developer contributions.

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In order to ensure that the plan is **effective** in securing the necessary standard of public transport in support of national policy and the strategic objectives of the plan, and to ensure service enhancement measures signalled in the Draft Sustainable Transport Strategy are adequately funded through appropriate developer obligations compliant with the Community Infrastructure Levy Regulations 2010 (as amended), Policy CP13 should be amended to read as follows:

"Proposals for major schemes, as defined by the Town and Country Planning (Development Management procedure) (England) Order 2010, will be supported where they:

*1. ~~Provide for a variety of forms~~ **Secure a comprehensive range of sustainable** transport choices **that are credible as sufficiently relevant and attractive** alternatives to the car to allow more sustainable ~~choices~~ **travel behaviour for both new and existing nearby residents.***

*2. Improve the **existing networks of transport** infrastructure ~~network~~ **and services**, including road, rail and bus, facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users, **and delivered through appropriate developer obligations as required.**"...*

(This modification would in effect subsume much of draft Policy EI12)

*... "Development proposals will be expected to consider, **define and secure delivery of** all possible sustainable transport options before measures are taken to increase the capacity of the road network ~~is increased~~. **Where necessary, proposals shall demonstrate that the package of sustainable travel intervenetiosn can credibly deliver the impacts required, including the diversion of existing car traffic onto active travel, and public transport, to transparently address any concerns raised by the Local Highways Authority and/or Highways England "***

The elements of EI12 concerning development location and urban design could easily be appended to this policy, or, alternatively, the language above could be merged into EI12 And CP13 deleted.

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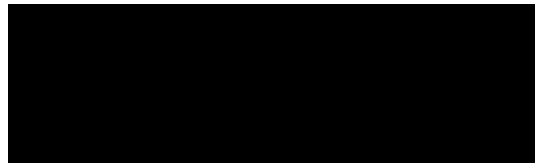
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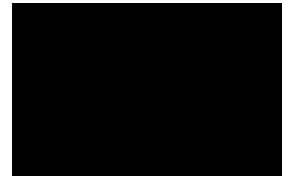
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Delivery policy EI 12 addresses "Promoting transport choice and accessibility".

As detailed in our representations to Cope Policy CP13, this policy unnecessarily duplicates much of the policy focus, and where it does not do so, unhelpfully splits the key policy requirements across two policy heads. It also starts to duplicate policy in the NPPF, at paragraphs 102-103 in particular, but in respect of Travel Plans, also at paragraph 111 and supporting Planning Practice Guidance.

The policy is also one of the longest and least succinct strategic policies for transport we have yet come across: in our view unnecessarily and unhelpfully so.

Aspects of the policy are imprecisely worded and also do not reflect properly the context of the District or the evidence base: for example, some proposed allocations are clearly not located in areas that are already well-served by public transport. The expectation is that proposals for these sites will address any such deficits.

Much of the language strays into areas which are already covered in other policy such as the Manual for Streets and Manual for Gloucestershire Streets, such a references to design speeds for streets.

As such, the policy is **ineffective**.

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To make the **policy effective** we suggest significant revision. Our suggestions are set out below.

Sustainability through design

All developments should be planned in line with the Sustainable Transport Hierarchy. In the first instance, opportunities to reduce the need to travel should be maximised, including through the provision of ancillary facilities on-site and through measures which enable people to work from home, such as high speed broadband.

Major development should be located in areas which are ~~already~~ **or will be** well served by public transport and have access to a range of local facilities within **easy** walking and cycling distance.

~~Masterplans should be designed to prioritise and facilitate the~~ **convenience and attractiveness** of active travel **walking, cycling and public transport**, including emerging mobility options such as e-bikes and e-scooters, over private car usage. Residential streets should be designed to a 20mph speed limit to enhance pedestrian and cycle safety. **Where appropriate**, bus permeability and associated facilities should be incorporated into development proposals, ~~where appropriate~~, and pedestrian facilities should ~~be provided to~~ ensure people can **conveniently** access bus services, either on or off-site. Shared mobility opportunities should be explored and accommodated through design, with the aim of reducing car ownership whilst maintaining personal mobility.

Delivering Transport Infrastructure

~~Where appropriate,~~ New developments will be required to **effectively integrate with** ~~connect into~~ the surrounding networks. In line with the requirements established in local policy, including the Gloucestershire Local Transport Plan, and the measures outlined in the Stroud Sustainable Transport Strategy **they will be expected to** contribute **proportionately** towards new or improved walking, cycling and **public transport facilities and services** within the District ~~and the provision of an integrated public transport network across the District.~~ ~~Walking,~~

~~cycling and public transport facilities will be required to be put in place~~
Sustainable transport connectivity and agreed improvements shall be delivered as early as possible ~~in development proposals~~ **after implementation** to ensure that **credibly attractive and relevant sustainable** travel choices are available at all stages of the development trajectory ~~opportunities for sustainable travel are available to support early occupiers in establishing sustainable travel patterns. Developers must take account of the proposals included within Stroud Infrastructure Delivery Plan, the Stroud Sustainable Transport Strategy and the Gloucestershire Local Transport Plan. In appropriate circumstances, new development will be required to contribute towards these schemes. Contributions, where reasonable and viable, will be sought towards these strategic transport infrastructure schemes from strategic allocations throughout the plan period.~~

Proposals which are likely to prejudice the future development of strategic transport infrastructure will not be permitted.

Enhancing Accessibility

All development proposals should have full regard to the transport impact on the strategic and/or local transport networks. ~~Major development proposals, or those that are likely to have a significant impact on the local transport network, will be required to submit a Transport Assessment as well as a Travel Plan, to demonstrate that they have fully considered safe and suitable access by all modes of transport. The Transport Assessments for major schemes will be required to establish the transport impact of the development proposals in the absence of mitigation. Where a severe impact is identified, mitigation will be~~ **mitigation is required it should be proposed in line with the sustainable transport hierarchy, with measures to reduce car trips from the development and in the immediate locality through demand management viewed favourably pursued before highways capacity enhancements.** ~~Measures which increase traffic capacity should not be seen as the default mitigation mechanism and will be accepted only where residual traffic impact remains severe after sustainable transport mitigation measures have been accounted for. The Travel Plan shall set out targets and measures for addressing travel demand through a package of measures. This will include maximising accessibility by sustainable transport modes, minimising traffic generation and mitigating the effects of additional traffic through a package of multi-modal measures which minimise the distance people have to travel. Travel Plans will be expected to include the offer of Personalised Travel Planning to all residents or users of proposed development. Any planning permission will require full implementation of the Travel Plan.~~ **Measures to actively manage travel demand through effective Travel Plans, in pursuit of clear and measureable targets to maximise the use of sustainable modes, will be implemented. Regular monitoring will be expected to ensure these targets are achieved, if necessary by applying supplemental measures.**

As set out elsewhere we see merit in merging this policy with CP13.

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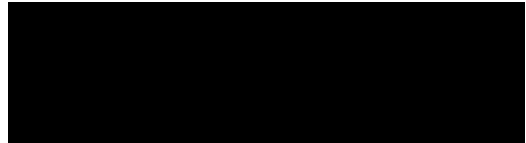
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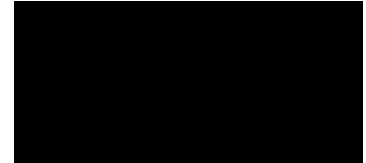
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NPPF makes clear at paragraph 35 c) that **local plans must be deliverable to be found sound.**

Government is particularly concerned that objectively-assessed development needs for housing are met across the plan period, not least because the substantial boost to the supply of housing that government continues to seek, will not be amenable to supply in early years being depressed, demanding ambitious and potentially unachievable uplifts in rates of development later in the plan period. The principle that at adoption, all local plan must be able to demonstrate a securely-deliverable five year supply (paragraph 74-78 of NPPF) is a key element of policy measures to support timely delivery of housing.

Stagecoach attaches very considerable importance to this. Simply put, where a plan fails to maintain a 5-year supply, and the presumption in favour of sustainable development is engaged under NPPF paragraphs 11 c) and d), this opens the door to development outside the plan-led system, for which effective planning and delivery of sustainable travel choices is typically a very great deal harder. Such developments tend to be in small villages, many with very limited services and amenities, and in most of these the availability of a credible choice to car use is absent. Even where regular bus services exist they are rarely more frequent than hourly, and even less rarely do they offer evening and Sunday facilities.

Since 2012, the operation of the "presumption" (also known as the "tilted balance") has led, across Gloucestershire and most other shire counties of England, to some of the most inherently car-dependent development, and patterns of development, that have ever been seen. In many cases, decision takers, including the Inspectorate have determined that, in the circumstances of serious housing delivery deficits, obviously car-dependent development nevertheless warrants permission, giving relatively little weight to this matter in the planning balance.

Troubling though this is, securing an effective plan, with a strongly evidence 5-year supply, would entirely avoid the problem arising.

Given the context of Stroud District where the bus network is not dense, and high-quality provision can only realistically be envisaged on the key corridors highlighted in the Draft Sustainable Transport Strategy, and the other supplemental corridors that we have highlighted previously to the LPA, the risks of "departure sites" being required and released under the presumption needs to be robustly mitigated through a plan that can immediately demonstrate a secure 5-year supply, as NPPF expects at paragraph 74.

Stagecoach is well aware of a range of work that has been done by various parties examining the complex issue of housing delivery in some depth, as will be the Council and other representors. This includes the Letwin Independent Review of Build Out reporting in 2018, and more recent analysis and commentary by major planning consultancies including Lichfields and Savills. The second edition of the "From Start to Finish" Report published by Lichfields reinforces important insights that were already apparent. Most recently, in April 2021, Savills has highlighted the ongoing fragility of housing delivery outside London.

Stagecoach West, for a range of reasons, undertakes its own systematic monitoring and analysis of planning activity, and housing delivery, both across Gloucestershire, and across its extensive operating area. We understand from property and planning professionals across the region that this work is at least as good as any currently undertaken by other bodies – especially because we monitor both site starts, and as far as is appropriate and realistic, progress in delivery. We validate this where necessary by reference to LPAs own recording, which is generally published rather too late to provide a "real time" view.

Both the national research and our own analysis make clear how far the risk of delivery delays disproportionately affect the largest sites. They are faced with technical and economic challenges that mitigate extremely strongly against early housing delivery. The latest Lichfield report reveals that for schemes of over 2000 dwellings it takes an **average of 8.4** years from the point a formal planning permission is lodged, to the first occupation. This period does not account for an

extended period, typically at least 18 months, necessary to prepare a valid application. Set against that, the research shows that such schemes, once mobilised, can reach and sustain quite high rates of output. Given the very elevated up-front infrastructure and servicing costs, they typically need to do so to generate the necessary returns on capital.

While the credibility of the Lichfields and other work needs no particular validation from Stagecoach, our own analysis across Gloucestershire and all its adjoining authorities, emphatically bears out the Lichfield's conclusions.

In fact we would go further. We see clear evidence, both within Stroud District and beyond it, that **the most effective way to reach and sustain the "substantial boost in the supply of housing" required** in a District, is to ensure that a significant proportion of dwellings to meet the need are allocated on a range of sites offering at least 100 dwellings, and ideally **each providing between 250 and about 1500 dwellings**. We can point in the immediate region to the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy area, Vale of White Horse and Cherwell District in Oxfordshire, and Wyvchavon in Worcestershire. However this is much more broadly apparent.

Such smaller and medium-sized sites are typically much less burdened by abnormal infrastructure and servicing costs. As such, they almost always deliver a policy compliant level of affordable housing. Our monitoring demonstrates this emphatically. By contrast, across almost all the regions we serve, and certainly within Stagecoach West's operating area, it is **exceptionally rare for any development including more than 2000 dwellings to reach the nominal policy figure for affordable housing**, and rarer still for the tenure mix to meet the LPAs requirements for affordable and social rented tenures.

Not only that, but **an appropriate geographic balance of sites is also very material not only in ensuring that housing delivery is appropriately related to needs, but also in sustaining delivery overall**, by avoiding an over-concentration of supply within a small part of the housing market area, which can lead to market saturation. Even where it does not, such concentrations of delivery only help serve to help distort the distribution of housing supply across the plan area. For affordable tenures and first time buyers in particular, the lack of geographic choice this engenders is much more likely to fuel the need to live more distant from places of work, then driving travel demands that sustainable modes cannot realistically meet. Obviously for larger market housing, households will tend to have wider range of potential options available to them, including through the resale market.

The draft submission plan is required by NPPF at paragraph 73 to set out a housing trajectory to evidence this. The housing trajectory table set out on page 306 and graph accompanying are the sum total evidence of the Council's modelling of the deliverability of housing. We dispute that this comes close to meeting the standards needed to satisfy this requirement, either practically or procedurally. **As such the plan is out of conformity with NPPF and is therefore unsound.**

There is no more detailed breakdown, in particular of the 3,840 dwellings committed for delivery between 2020 and 2025: 768 dwellings per annum from this source alone, with overall delivery rising from about 800 per annum to over 1000. This implies a substantial immediate boost in housing supply, even before

the allocations come on stream. Given that to date annualised delivery across the District has not exceeded 600 units prior to 2019 this is a little surprising.

On the crudest of face value then, which is the only basis on which the trajectory can be read, the arithmetic position looks very comfortable. It implies that there is no real need for any new allocations to deliver prior to 2025, though the trajectory is assuming that some will. A significant number of "local allocations" could also credibly come forward much earlier.

Examination of the latest 5-year supply update published in November 2020 by the Council shows how far the first five years of the plan relies on the major developments at Hunts Grove and West of Stonehouse.

While Land West of Stonehouse was unusually prompt to mobilise and has reached output rates of over 200/annum in a short space of time, Hunts Grove has a much longer and more troubled history, not least because of the infrastructure cost burden associated with creating a major new signalised junction on the A38. While recent improvements by Highways England to M5 junction 12 and a little earlier at Cross Keys Roundabout have removed the cap imposed to date from those constraints, no progress has been made on implementing this junction, which is necessary if more than 750 dwellings can be occupied. This limit is rapidly being approached. There seems to us to be a very strong risk that the development will stall, once again. Given that Hunts Grove has been contributing up to about 150 completions per annum over the last few years, such a scenario starts to immediately put a significant dent in annual supply.

Not only that, but a further 750 dwellings on which the Council is relying to come forward within the next five years to provide 166 units, on the Hunts Grove Extension, entirely depends on the delivery of this junction and the internal infrastructure within Hunt Grove. No application has yet been lodged, despite the site having been allocated for several years.

All it then needs, from 2023 onwards, is for delays to affect the other strategic allocations, and the supply position looks quite likely to unwind. As it is, the assumptions regarding Wisloe, Sharpness Docks and Cam North West look prone to some delay, especially given the history at Sharpness Docks where a planning application has yet to be lodged. Even one year for each creates an annualised loss of supply of about 200 per annum between them.

The reliance of the plan from about 2024 onwards almost entirely on new larger sites to support the trajectory also looks quite risky. Should difficulties arise in the first five years of the plan, the ability to recover this from over-delivery from new allocations alone, looks likely to be even more prone to becoming "hostage to fortune".

In this regard, **the reliance on Sharpness Vale (PS36) to deliver 500 dwellings by 2030 looks especially challengeable.** Taking the conclusions of the Lichfields Report, even if a valid application were tabled this year, and the site were economically viable to deliver, the first occupations could not prudently be expected until around 2030. The site requires such significant up-front infrastructure investment, that even this date could well be quite ambitious.

The evidence also consistently shows that within 3-4 years of first occupation, it is very unusual for sustained high rates of delivery and market absorption to be achieved on large developments.

Irrespective, the submission plan is not backed by transparent evidence of delivery and delivery assumptions. There is no evidence that appropriate timescales for post-consent regulatory processes, including for planning and construction of service and infrastructure connections, have been properly considered. As such, it is inadequately evidenced and the soundness of the plan with respect to five year supply is accordingly highly challengeable.

Stagecoach considers the evidence set out in Section 7 regarding the trajectory to be inadequate, and such as it can be reviewed at face value, we consider that the plan is both **inadequately evidenced**, and likely to be **ineffective**.

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6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Stroud District Council has before it several options to allocate a number of smaller but significant sites in the most sustainable settlements to securely achieve an immediately and ongoing five-years supply, and at the same time boost the overall security of affordable housing provision and achieve a more balanced housing distribution. This could be achieved while still tightly aligning with the overall plan strategy and principles of sustainable development.

While there would be a range of options, those able to align with good public transport corridors are much fewer. Accordingly, we have consistently pointed to both Whitminster and Kingswood as locations that not only have range of local facilities, but also either will, or could, benefit from a step change in public transport provision. In the case of whitminster this is by virtue of its location on the junction of the A38 and A419 Sustainable Movement Corridors. In the case of Kingswood, it lies on a potential supplemental public transport corridor in the far south of the District we have consistently signalled to the Council and to the County Council as LTA.

We are committed to running every 30 minutes through Whitminster from September 2021, between Stroud, Stonehouse and Gloucester, also passing by or close to major employment areas in Quedgeley and south of Gloucester, including Gloucester Quays and Bristol Road.

We are aware that the Council, in allocating "about 10" units in the village at Upton's Lane (PS45) and 40 at School Lane (Site PS46), already has judged it to be a relatively sustainable location. A live application for 100 on the School Lane site is currently before the Council (S.21/0236/OUT). There may be other options, but this one is clearly available and deliverable.

As successive previous rounds of representations attest, we have identified a supplemental bus route corridor between Wootton-under-Edge, Kingswood, Charfield and the Bristol Northern Fringe and we are in ongoing discussion with a number of parties to bring this forward. This would provide highly relevant public transport links between the settlements, and to the established and rapidly

growing technology employment cluster at New Mills within the Parish, where the Council has also proposed to allocate a further 10Ha of employment.

The lack of development proposed within the settlement cluster, is especially stark when set against both the existing employment base in the area and that proposed as part of the plan. Evidently, it is not possible to meet housing need adjoining Wootton itself given landscape and topographic constraints.

We note that, like Whitminster, the Council has allocated 50 dwellings in the village (Site PS38, Land South of Wickwar Road), reflecting its conclusion that the settlement is relatively sustainable. Again, we agree.

However, we are aware that there is current known and pressing constraint surrounding primary education places in both Kingswood and in Wootton. Nevertheless, we are also apprised that a credible further promotion exists in Kingswood that could resolve this issue also. The delivery of additional growth in the cluster, of an appropriate scale, is also highly likely to help catalyse and sustain the regular public transport provision we have identified, operating as much as every 30 minutes, in an area that is under-served even by the standards of Stroud District. This really needs a critical mass of additional residential demand, combined with education and employment flows. The corridor comes close to reaching this, but based on known commitments and likely growth in Charfield does not quite attain it.

We therefore urge the Council to positively reconsider making meaningful allocations from the promotions before it in Kingswood.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:

