

Part B – Please use a separate sheet for each representation

Name or Organisation:

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.

Policy G2 provisionally allocates land at Whaddon for at least 3000 homes and associated infrastructure and land uses, including primary and secondary education.

Stagecoach is maintains its previous **conditional support** for this proposed allocation which it believes offers clear potential to be **in conformity with NPPF**, and could be **effective** in supporting the delivery of the Strategic Objectives and the Key Priorities less of this plan, and more of the Review of the JCS.

We agree that there is sufficient evidence to point to this site as a potentially sustainable option to meet housing needs arising in the City of Gloucester.

Land at Whaddon has a long promotional history, going back over 20 years. It is evidently an option that has already been judged against a range of alternative sites not all within Stroud District, that would be potentially effective in sustainably meeting housing needs arising in Gloucester that cannot be accommodated within the City boundary, the exact figure for which will become apparent through the Review of the JCS.

Gloucester Cheltenham and Tewkesbury Joint Core Strategy (JCS) process started to examine the potential of this site faced with a deficit in provision apparent within the JCS area. Stagecoach offered at that time the view that the site had potential to benefit from rational extensions to the city's bus network, as well as being very close to the existing direct inter-urban bus corridor between Gloucester and Stroud. The JCS Inspector concluded that this site had merit.

In fact we note that it was the Gloucester Cheltenham and Tewkesbury Joint Core Strategy (JCS) Inspector who concluded first that bringing Land at Whaddon forward to meet unmet identifiable needs within the City of Gloucester was justified. So persuaded was she that an explicit instruction was given to the JCS Authorities to pursue Memorandum of Understanding to seek to allocate the land for this purpose in a Review of the Stroud District Local Plan.

We note that in 2019, The Assessment of Strategic Development Opportunities in Parts of Gloucestershire: Interim Report, assessed 29 locations adjacent to Gloucester and identified seven locations as having the highest current degree of accessibility to Gloucester. Of the three locations identified *within Stroud District*, land at Whaddon is considered to offer the most potential to help meet the future housing needs of Gloucester.

At Paragraph 3.4.23, the Draft Local Plan concludes that "*However, it is important that this initial assessment does not undermine the ability of the City Council to consider reasonable alternatives in the development of the future spatial growth strategy for Gloucester as part of the review of the Joint Core Strategy. Therefore, at this stage, the **District Council supports the safeguarding of this site** to help address the future housing needs of Gloucester City, if required.*"

While we recognise the merit and soundness of pointing to this site for conditional release, only to meet needs arising within the City, we consider that site G1 Land South of Hardwicke is better positioned, and also likely to be more immediately deliverable in the short to medium term, to meet the City's needs.

There remain significant transport-related constraints on this site. We recognise a considerable amount of work has been done to identify mitigations, we remain to be persuaded that these measures will be sufficient to allow the operation of reliable, and relevant bus services, mainly because **we have yet to see any clear evidence that buses will not be caught in chronic peak congestion between the site and A38 at St Barnabas roundabout.**

Thus, **any public transport service improvements that are identifiable – and there are several as we outline below – look at the very least likely to be seriously compromised**, and quite possibly entirely jeopardised.

We are also especially **worried that any kind of unified public transport corridor through the site will be frustrated by two adjoining land controls**, each of which seem to be unwilling to provide a seamless north-south bus link through both controls from Grange Lane towards the southern edge of the site on Naas Lane. Here we understand a bus-only connection is anticipated that would allow a high-quality sustainable access connection beneath the railway, towards the major employment cluster at Waterwells and Quedgeley beyond referred at paragraph 3.4.32.

Without a single seamless bus route through the site, we must stress that the northern site, controlled by L&Q, would probably not be served directly by bus at all. Any route serving the larger holding to the south under the control of Taylor Wimpey UK, without the ability to take advantage of the combined demand, would never be able to develop the level of patronage necessary to provide a service at the highest possible frequency.

Stagecoach commentary on the proposed G2 allocation

A **broad strategy for bus service augmentation for the site is clearly identifiable**. The site benefits for being near the terminus of service 9 in Tuffley, and alongside the existing service 63 linking Gloucester and Stroud on its eastern boundary. The capacity of the site is substantial and does support potentially high-quality provision, if rational bus access and routing is deliverable. We would highlight that the combination of Whaddon with Tuffley is likely to provide sufficient critical mass to allow the restoration of both more frequent and more direct services into Gloucester from the adjoining existing neighbourhoods.

However, while the site is passed by service 63, and could serve initial phases towards the eastern edge, land control on the eastern edge of the allocation will not permit direct vehicular access long most of this edge from the A4173. This being the case **simple diversion of the 63 route into the site between two access points looks to be unachievable**. It is largely for this reason that we

have pointed to the need for a local intermodal hub that allows local residents within the development to walk or cycle up to this provision, as well as intercept existing journeys into Gloucester on the edge of the built up area, to take advantage of direct bus services running in time at least every 15 minutes into the city and using comprehensive bus priority to do so, avoiding queueing and delay on the A4173 Stroud Road approach to St Barnabas and also, potentially, on Eastern Avenue.

We do not agree that sufficiently demand will rise in this area from existing and new development to warrant the delivery of direct bus services, as point 16 of Policy G2 indicates. Both limited frequency and extended journey times would make it very difficult to envisage providing a relevant service.

However, the policy G2 makes no reference to **the potential impact of the development on already severe delays on all approaches to the St Barnabas junction**, despite the Traffic Modelling Report 2021 highlighting this problem, as did previous modelling work done in support of the current JCS before it. **Without buses being able to either bypass the queues** or otherwise benefit from bus lanes – which the width of Stroud Road looks incapable of accommodating – **there is little likelihood that there will be much, if any use made of the intermodal hub, or, for that matter, any bus service from the site.** Increasing levels of delay on the Stroud Road would directly lead to extremely elevated levels of car use – not least, as these allow the use of a variety of rat runs already available to bypass the queuing, including under the Grange Road rail bridge, which is too low to be used by buses.

We are aware that a significant amount of work has been done by at least one of the promoters that appears to indicate that additional capacity might be provided on Stroud Road and the A38 approaches to St Barnabas. It is clear that this capacity will be modest, and will be likely to do little or nothing to effect mode shift. While we recognise that these issues are encountered outside the Plan area, the selection of G2 as a reserve site is directly related to Gloucester's housing needs and therefore, by extension, the spatial strategy of a review of the JCS.

The traffic impacts of the G2 allocation cannot be divorced from consideration by the policy simply because they lie outside the plan area: this would make a mockery of the clearly stated provisions about the duty to cooperate in NPPF, which explicitly refer to infrastructure needs and not merely to delivery of housing numbers, as so often seems to be the case: *"Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. (paragraph 24)... "In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere." (paragraph 26, our emphasis).*

For the avoidance of doubt, we do not consider that this duty has been failed to date, and since the policy makes a provisional allocation, it allows for the JCS Review Process to consider the transport impacts and potential mitigations in the round. However that does not entirely absolve this plan of its need to set a clear expectation of "what needs to be true" for the City's housing needs to be accommodated here within Stroud District.

The absence of any mention of these impacts, and likely mitigation requirements, which are clearly indicated in the transport evidence base, is serious. These impacts risk giving rise to severe residual unmitigated impacts in the sense of NPPF paragraph 109, and if so, would render it difficult to positively determine application/s for the G2 allocation were it to be confirmed in due course. We are aware of a number of strategic schemes elsewhere where notwithstanding an allocation in a development plan, subsequent planning applications have elicited highways objections. It is essential that any future allocation is properly underpinned by robust evidence that NPPF chapter 9 can be complied with, and that the wider local policy suite both sides of the district boundary equally so. **As things stand, we do not see this evidence presented, and accordingly the provisional allocation in our view is insufficiently evidenced to be fully justified.**

The bus service provision on Stroud Road will also be likely to offer an anchor for provision in advance of the delivery of a north-south bus spine through the entire site, as indicated in paragraph 3.4. and at point 16 of draft Policy G2. This will run parallel to and west of Stroud Road, and is much more likely to be used, once delivered, by an extension of the city bus network (currently run as service 9) than by the interurban Gloucester-Stroud service. **The bus spine needs to be delivered suitably early and no later than the 500th dwelling anywhere on the site lying more than 400m from stops (including the inter-modal interchange) served by the initial bus provision available on Stroud Road.**

The **sustainability credentials of the proposed allocation depend to a great extent upon the physical proximity of existing employment around Waterwells with Quedgeley beyond.** Both are well within comfortable cycling distance, but many would prefer to use public transport given

distances and topography in the area. However the railway line severs the site from the west, and existing legacy rail crossings were constructed essentially as agricultural accommodation bridges. They are constrained in width. That at Grange Road is also height restricted.

We therefore **strongly support the identification of a sustainable mode filter to Naas Lane;** and in fact we would prefer that any vehicular access from the allocation across the aril line using Naas Lane is precluded, as even a longer route via Stroud road will be attractive enough to simply cause residents to drive. Given the under-bridge needs signal-controlled shuttle working, such general traffic will only serve to create significant queues and delays on both Naas Lane approaches at peak times, rendering any attempt to prioritise sustainable modes ineffective.

This would also be likely to permit good cycling facilities under the railway and it appears likely that facilities that meet LTN 01/20 standards would be deliverable. The attractive pedestrian and cycle connectivity, as well as a direct bus route, creates an outstanding credible alternative to personal car use for these local journeys.

(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.

Policy G2 must be altered to make it effective in providing for a comprehensive scheme that delivers a seamless and unified movement and access strategy prioritising sustainable modes and public transport in particular, and that these measures are put in place sufficiently early in the development programme to be effective.

It should read :

" A development ~~brief~~ **framework document** incorporating an ~~indicative masterplan~~, **one or more parameters plans, and in particular one covering movement and access shall be prepared and to be approved by the District Council before the submission of any planning application for any part of the allocated land, and will set out detail** the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner **across the whole allocation. The principles therein will be treated as material considerations in development management decisions...**

...

12. A layout which prioritises walking and cycling and access to public transport over the use of the private car by, for example, providing a network of internal walking ~~and~~ **cycling and public transport routes** that are shorter in distance than the ~~highway network~~ **driving routes to key local destinations**, in accordance with Manual for Streets;

...

14. Contributions and support to sustainable transport measures on the A4173 sustainable transport corridor **that ensure that cycling and public transport in particular are offered safe and free flowing conditions, including on the relevant approaches to the St Barnabas junction;**

...

16. Public transport permeability through the site, including a **direct, and seamless bus link** between Naas Lane and Grange Road ~~and~~ **providing bus stops and shelters** at appropriate locations within the development to ~~access~~ **facilitate** existing diverted and new bus services and **sufficient financial** contributions to enhance bus service frequencies to key destinations including **first Gloucester, and then Stroud, on a phased basis.** ~~and Stonehouse;~~

...

22. Phasing arrangements to ensure that **public transport**, employment, retail and community provision is made in a timely manner."

(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)

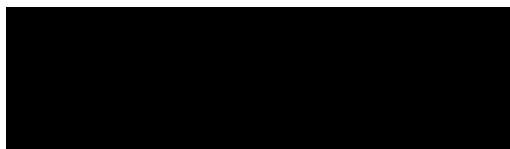
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

See main representation on Evidence Base and District-Wide Policies

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:

