


July 15<sup>th</sup> 2021  
**Your reference:**  
Director  
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SN3 4HGDear **Land at Grove End Farm, Whitminster (SDC SHLAA ref WHI014)**

In the light of the progression of the Stroud District Local Plan Review 2040 to the pre-submission consultation (Reg. 19), at which all substantive representations must be made to the Council for onward submission to the Planning Inspectorate, Stagecoach considers it appropriate to ensure that the Council and the forthcoming Examination are fully apprised of our views on your client's promotion of land at Whitminster, referenced above. We have made these views known last December to the Council, and others including the County Highways Authority, in connection with the supplementary consultation on Additional Housing Sites.

Stagecoach West unequivocally endorses the promotion. This is because it is one that demonstrably aligns extremely well, with the achievement of the development strategy of the plan. In particular, the site satisfies the requirements of Draft Policies DCP1, CP5 CP1 and EI12, to secure the maximum impact on carbon emissions, including through the minimisation of the need to travel, the reduction of travel distances, and the maximisation of the effective role of all sustainable modes. These requirements flow directly from the Strategic Objectives of the plan and the Key Priorities set out in it, and the development strategy and policies to steer development proposals that follow from these. In fact, of all the credible sites either allocated in the Plan or omitted from it, in terms of its ability to take advantage of existing sustainable travel options, as well as secure substantial and effective further improvements, the promotion stands out.

It is important to comment not only on this, but to ensure that the baseline position for public transport is properly understood, as significant changes to the network will take place in September 2021. While these have been agreed for several years and have been clearly signalled to the Council at every stage in the plan-making process, we note that the evidence base does not reflect these.

**1. Previous Stagecoach Representations**

Stagecoach has been clear in formal representations from the very outset that:

- The plan risked facilitating and exacerbating already very high levels of longer distance car-borne commuting both within the District and beyond to larger and more dynamic economic hubs to the north in the Central Severn Vale and the south in Greater Bristol. The spatial strategy and the measures in the plan therefore needed to contain and reverse these trends, not least to ensure that carbon emissions could effectively be

mitigated. In addition, the existing deleterious impact of traffic congestion within and beyond the plan area on the reliable and cost effective delivery of bus services was likely to continue to worsen, undermining the performance and effectiveness of bus and coach services across a much wider area. This cannot be countenanced.

- Given the limited public transport network density, and current baseline position of exceptionally high car dependency, the plan would need to leverage the opportunities to take advantage of higher quality existing bus services, and the ability to consolidate flows on them to secure substantial improvements to the relevance and attractiveness of bus services, to the greatest possible degree. This is reflected in draft policies CP5 CP13 and EI12, as well as DE11.
- While proximity and adjacency to existing larger urban areas is likely to help secure much higher levels of active travel and can assist in supporting higher levels of public transport use, the lack of credible sites to meet the development needs of the District meant that expanded villages and/or new settlements were very likely to be needed. This has been borne out strongly as the plan has subsequently emerged, with the identification of two substantial new settlements at Sharpness (Policy PS36) and Wisloe (Policy PS37).
- The location of any such developments will be extremely sensitive to the availability of existing public transport, and, to a great extent the opportunities to leverage existing major flows to provide greatly improved ones, where such services are not currently identifiable. We pointed to the A38 as offering the key corridor that obviously presented these likely opportunities. While at the start of the plan-making process, public transport provision along the A38 was relatively weak and intermittent, we assured the Council that committed improvements were to take place on the northern portion of that corridor, between Stonehouse and Quedgeley through Whitminster. Not only that, but as a former trunk road, this route is engineered to a much higher standard than current traffic flows generally warrant. This makes it a relatively low-cost and low-risk proposition to repurpose current redundant or under-used carriageway, to provide for extensive bus priority measures on approach to key junctions to the north at Cross Keys, and to the south towards M5 at junction 13. This has separately been identified and acknowledged by the Draft Sustainable Transport Strategy at section 4, which then leads to the parallel conclusion drawn at Section 5 regarding the character and nature of the A38, that *“lends itself to providing express movements for public transport, with relatively few stops focused on points where people from nearby settlements access the A38. Investment should therefore be focused on direct services at high frequency which can compete with private car usage in terms of journey times and flexibility. **The approach to this corridor should ensure that surrounding settlements, such as Whitminster, Eastington and Berkeley, can access these express services by sustainable modes if possible and ensure that they do not compromise the express nature of the service.**”* We unequivocally endorse this conclusion.
- The ability to provide enhanced inter-modal connectivity, including to existing and potential longer distance coach services using the M5 or in time the A38 must be secured at key nodes. This reflects emerging Gloucestershire County Council policy in its emerging Local Transport Plan, which has been published for some time but remains under review. Of these likely nodes, within Stroud District that around M5 junction 13 stands out, as this is where the A38/M5 north south corridor intersects with the main A419 route that offers the movement spine eastward to and through the largest settlements in the District of Stonehouse and Stroud.
- In the light of the above we explicitly signalled that the Whitminster area was likely to justify very careful examination of the opportunities for sustainable development on a significant scale.

## 2. Whitminster and its locational characteristics

Whitminster is one of the few significant settlements on the A38, though the village itself is located largely off-line to the west. The Council places this settlement as one of the few in the third tier (3a), in the refreshed categorisation set out in the Draft Local Plan and evidenced by the Council’s Settlement Role and Function Study Update (2018).

There is already a quite explicit recognition by the Council that Tier 3a settlements outside the AONB and Green Belt are likely to represent some of the most appropriate potential growth locations, once the scope for sustainable development at higher tier settlements is fully exhausted. This is set out fully in support of Core Policy CP3, as follows:

*“These medium-sized and large villages are generally well-connected and accessible places, which provide a good range of local services and facilities for their communities. These villages benefit from their proximity and/or connectivity to higher tier settlements or transport corridors, which enables access to employment and key services and facilities elsewhere, and which may offer some scope for further transport and accessibility improvements. These are relatively sustainable locations for development, offering the best opportunities outside the District’s Main Settlements and Local Service Centres for greater self containment.*

*Some of these settlements outside the AONB may have scope to help meet the housing needs of more constrained Tier 1 or Tier 2 settlements.”*

It is the first such encountered on the A38 south of Gloucester, including the existing and committed new employment found at Quedgeley on or close to the identified A38 Sustainable Movement Corridor (SMC) in the Draft Sustainable Transport Strategy. This means that, beyond the edge of Gloucester, the distances involved in travelling to employment, services and amenities both to the north in Gloucester and south/east at Stonehouse and Stroud can be minimised, compared with almost any other option on this corridor, or, for that matter, almost any other Tier 3a settlement in the whole District.

It has to be admitted that the public transport options on this part of the A38 SMC today are very limited. As we point out at Section 4 of this letter, this baseline position is about to very substantially improve.

However, the A38 between Stonehouse/M5 junction 13 and Gloucester through Whitminster is especially amenable to public transport enhancement as STS requires, even before new longer-distance express bus services are considered running along the A38 and/or M5 towards the south. This is because:

- firstly this section links one of the largest and fastest growing settlements in the District, Stonehouse, with Gloucester via a rational public transport route.
- Secondly and greatly assisting this, the distances involved along this route are relatively short, with the further benefit that virtually non-stop operation to Hardwicke would be involved, and Quedgeley a short distance beyond.
- Thirdly, the development strategy of the Local Plan consolidates a substantial amount of further growth along this route corridor. This includes proposed Strategic Allocations to the north, at Hardwicke Green (G1), a consolidation of committed development underway at Hunts Grove (PS30) and at the former RAF Quedgeley sites (PS32) for employment; and to the south east with Strategic Allocations for employment East of the M5 (PS20); and for residential development at North West Stonehouse (PS19a), consolidating the existing major development underway West of Stonehouse.

We separately identified the potential role of M5 junction 13 in facilitating interchange between local movements with longer-distance express coach services, subject to suitable interchange facilities being provided close to the junction.

This has also been identified explicitly within by the Council’s STS, which, under the initiatives that should be progressed under the STS Corridor Strategy states that *“Express bus services between Stroud and Bristol, potentially with an interchange point in the vicinity of the M5 Junction 13 ... will provide attractive bus service linkages between the two destinations via a combination of the bus corridor packages and interchange strategy which form part of this STS.”* (p 23). This interchange could be provided either east or west of the M5, of course. Indeed, east of the M5, we have previously been in detailed discussions with the promoter of the EcoPark and new FGRFC Stadium, the potential to set up the car parks and the bus/coach stands to facilitate exactly this, when home matches are not being played,

though this does not form an explicit part of the current proposals that the Council resolved to grant on 20th December 2019. Equally, it could be provided to the west, south of Whitminster.

Finally, the nature and character of the former trunk road does not present an attractive aspect or approach to the village, and severs some existing facilities from the existing village. The road also has its own adverse environmental impact on the amenity of the eastern flank of the settlement. With the considered siting and urban design of an appropriate level of development, it may well provide possible to address all these problems. This could involve the transformation of the character of the A38 through the village well away from the existing village, while the development itself would be highly unlikely to have any material impact on existing vehicular flows past the village as the access points to the site would be outside the village confines, to the north and south.

It is for all these reasons that we suggested that opportunities might exist in the vicinity of Whitminster, to accommodate the development requirements of the District.

### **3. The Proposals at Grove End Farm, Whitminster**

We confirm that your client approached us in respect of these proposals at the earliest stage, in 2019, having secured control of the land currently under promotion. We are pleased that the history of constructive engagement over many years with Robert Hitchins Ltd. and its professional team has demonstrated the value of involving us in the formulation of development proposals in this manner. Of course, this does reflect the language at paragraph 102 of the National Planning Policy Framework 2019 (NPPF) where transport matters should be considered “*from the earliest possible stage*” in the preparation of plan strategies and development proposals alike.

We have been able to reinforce the points made above. In particular, we have worked to highlight the ways in which bus access and circulation to and through the potential developable area could be optimised. This is still the more important as the service involved will be connect much larger settlements to the east and north, and need to maximise the efficiency of end-to-end journey times, to the greatest possible degree avoiding unnecessary circuitry and delay. We have also sought to ensure that existing residents of Whitminster should enjoy the maximum benefit from greatly improved bus services. We have been able to iteratively respond to the key constraints on the master plan, as these have become apparent.

We are very pleased to record that the following key opportunities and requirements to secure the highest level of public transport provision and use from the site and its immediate vicinity:

- Rational site access points maximise the scope for public transport penetration as this is not constrained by land control;
- Optimal efficient bus route corridor through the site, which might offer further opportunity for “virtual” bus priority through filtered permeability, should this be warranted;
- Disposition of land uses maximises bus stop hinterlands, with scope to create attractive and effective local interchange possibilities at the local centre;
- Site identifiable for multi-modal hub giving access to longer-distance services;
- Potential to examine the use of Grove Lane as a sustainable transport priority route further improving the effectiveness and efficiency of the core service.

### **4. The baseline bus service position at Whitminster**

At this writing, the service along the A38 past Whitminster is provided by the service 60 that runs about every 2 hours between Dursley and Gloucester along the A38. This could not be described as a regular service, nor one that would be likely to provide credible alternatives to car use.

A substantial revision to our network in Stroud District will take effect at the start of September 2021. This has been anticipated for some time, and signalled to local authority stakeholders consistently over the plan-making period.

We will reorient the main Stonehouse-Gloucester service to run through Great Oldbury to Whitminster and Quedgeley, replacing this between Stonehouse and Quedgeley via Standish with an hourly facility. As a result, Whitminster will benefit from a half-hourly service running directly to Quedgeley and Gloucester to the north, and to Stonehouse and Stroud to the east.

As well as direct connections to some of the largest local concentrations of employment in the District and south of Gloucester, the route passes or runs within reasonable walking distance of a large proportion of the secondary education and college sites in Gloucester and Stroud.

This service represents the baseline position for public transport in Whitminster. As such the level of service, and the journey times offered to key destinations, present among the best set of public transport choices of any of the site options being considered in the Local Plan at the outset. It should be recalled that at this time, very few services in Stroud District operate more frequently than every 30 minutes.

## **5. Potential to develop bus services at Land at Grove End Farm**

The location of the site between the Gloucester Southern Fringe and the western end of the District's largest concentrations of population and employment at Stonehouse and Stroud offers the greatest potential to further develop the baseline service offer. As the draft policies in the Plan and the evidence base documents clearly recognise, a development strategy that can consolidate demand on the main travel corridors is that most likely to positively transform the opportunities for improved public transport.

It is clear that the land under promotion would be highly likely to either directly deliver or significantly contribute towards a wide range of policy aspirations for sustainable transport, set out both in the County Council's draft Local Transport Plan and the District's Submission Draft Local Plan development strategy as far as they relate to the A38 corridor and the immediate area between Quedgeley and Stonehouse.

The wider aspirations for the A38 include:

- Use of modal filters onto the A38 benefit sustainable travel modes.
- Rapid bus/coach services to key destinations such as Bristol and West of Cheltenham
- Improved frequencies of bus services,
- Improvements in bus stop infrastructure
- Where appropriate, bus priority (including virtual bus priority either on- or off-line the existing A38)
- Northern Metrobus extension (seamless bus priority measures up A38)
- Safety improvements for pedestrians and cyclists at Cross Keys Roundabout

The proposals are also extremely well-placed to align with other interventions related to the Stonehouse cluster, and the Gloucester Fringe, with which the transport strategy naturally would synergise. These include:

- Improved frequencies of bus services on A419/B4008 between Stroud, Stonehouse and Gloucester, including improvements in bus stop infrastructure, and where appropriate, bus priority
- A419 corridor – Chipman's Platt Roundabout upgrade

Moreover, west of Chipman's Platt, a bus priority route would tend to draw together any divergence of the main services between the Great Oldbury Spine Road and the A419 into a single corridor, and at the same time create a natural interchange point between these more local services on both the A38 and A419 movement corridors, and any long-distance express services using either the A38, M5 or both.

To be more specific, the A38 between Whitminster and Gloucester via Quedgeley, is one of the most obvious candidates for frequency upgrade. Any services from Dursley and Cam fast to Gloucester would converge with the Stonehouse-Gloucester provision.

The core Stroud-Stonehouse-Gloucester route via the A38 will also warrant further frequency improvement. The scale of the proposals at Grove End Farm, at about 2,200 dwellings, is evidently sufficiently large to catalyse a substantial further frequency improvement to the baseline service. The route also would serve a portion of the substantial proposed allocation at Hardwicke Green (G1) on its eastern edge where initial phases are most likely to be brought forward, further reinforcing both the demand and the supply on this corridor. An allocation at Grove End Farm further synergises with the plan's development strategy in this manner.

The ability to bring forward seamless bus priority on the A38 within the carriageway, is the final critical opportunity presented to the plan's transport strategy on the corridor. This should be provided northbound towards Cross Keys roundabout at Hardwicke, and southbound towards (or bypassing) M5 junction 13. By insulating the bus operation from any pressures arising from traffic growth, the relative attractiveness of the service offer is likely to substantially increase.

A 15-minute core frequency ought to be credibly achievable. On top of this, express longer-distance provision towards Wisloe, Cam and Dursley; and potentially beyond towards Bristol would add further frequencies and options. For example, should a coach interchange be delivered, it is possible to imagine direct fast services running from this point not only towards Bristol, but north to the new multi-modal hub at Arle Court, west of Cheltenham. Construction work begins in 2022. It is well within walking distance of GCHQ and other major employers, and the nationally significant cyber-technology cluster planned nearby.

## **6. Concluding Comments**

Stagecoach therefore concludes that the promotion by your client at Grove End Farm demonstrably aligns with the development strategy of the Submission Draft of the Stroud Local Plan Review to 2040 to a degree that few other sites can. As such we consider that it will serve to secure the challenging objectives and Key Priorities of the plan, which focus on carbon mitigation, which in turn requires radical improvement of the public transport offer throughout the District, and in particular between the key centres of population and activity.

We look forward to continuing to work with you, and both the County and District Councils, to establish in further detail how the opportunities at Grove End Farm can be best realised as part of a sound Local Plan strategy.

Yours sincerely

A black rectangular redaction box covering the signature of the Head of Strategic Development and the Built Environment.

Head of Strategic Development and the Built Environment