

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" 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

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 PS24 allocates land at Cam North West (Land North West of Draycott) for about 900 homes and associated infrastructure and land uses, including primary education.

Stagecoach is maintains its previous **unequivocal support** for this proposed allocation which it believes is **in conformity with NPPF**, would be **effective** in supporting the delivery of the Strategic Objectives and the Key Priorities of this plan.

Leaving aside the Councils own declaration of Climate Emergency, legally-binding national decarbonisation targets, also demand very substantial mode shift if they are to be met. This has been clearly recognised by DfT's Green Paper Decarbonising Transport: Setting the Challenge (March 2020).

In July 2021 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 plan recognises that there is a 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..."* The objectives are set and the direction of policy travel is clear.

Sustainable transport and movement is a particular challenge in the District. The Key Issues and Priorities set out in the plan make plain that car dependency is especially high. The spatial strategy must therefore go to the furthest possible extent to seek to maximise the opportunities for sustainable travel, as is recognised at draft Core policies CS5 and CS13, and draft Development Management Policy EI12. This is still more important in light of the high and rising contribution made to GHG emissions by personal car use.

It is therefore essential that allocations in the plan are sited and designed so that sustainable transport can play the fullest possible role.

The proposed allocation PS24 "Cam North West" conforms from first principles with the requirements of NPPF at paragraph 103 which require that *"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."*

The site entirely aligns with the emerging suite of local plan strategic and development management policies, including CP5, CP13 and Development Management policy EI12. Draft policy EI12, which we propose should be modified, even in its current form requires that *"Major development should be located in areas which are already well served by public transport and have access to a range of local facilities within easy walking and cycling distance."*

Given the constraints **the role of existing and deliverable public transport corridors in steering and defining patterns of development becomes a "crucial point of difference" that needs to carry great weight in the plan-making process.** This is clearly recognised by the Strategic Objectives of the Plan and by the Transport Evidence Base. As we make plain elsewhere in our wider representations on this plan, Stagecoach continues to strongly support the clearly established principle that Sustainable Movement Corridors should shape the development strategy for the Plan area. Stagecoach considers this a self-evident principle to shape the plan strategy. It is evidently a much more sustainable approach when a wide range of reasonable alternatives have been considered.

Stagecoach commentary on the proposed PS24 allocation

The identification of land north-west of Draycott, directly on the A4135 Sustainable Movement Corridors and very close to Cam Rail Station is entirely consistent with both the requirements of NPPF chapter 9 and the proposed policy and spatial strategy in the local plan.

This location offers **very particular scope to achieve significant augmentation of the bus and coach service offer both serving the site and the wider plan area. Today, this is currently quite limited. This is a particular merit of this site.**

A **broad strategy for bus service augmentation for the site is clearly identifiable.** This will synergise very well with other proposed allocations at the Wisloe New Settlement a close distance to the North, consolidation of the current Local Plan allocation at Cam North East, and around junction 13 of the M5, reflecting the benefits of steering development towards the Sustainable Movement Corridors, and in so doing leveraging density of flow. **This synergy makes it highly likely that a higher level of bus and coach service will be achievable to and from the site, than that which would be supportable by this development alone.** This aligns entirely with the Government's National Bus Strategy for England (April 2021) which sets expectations for "Super-routes" offering direct regular inter-urban links between main settlements in more rural areas.

From September 2021, the baseline bus service position will change. This will strengthen connectivity between Cam, Dursley and Stroud, using the more direct route via Uley and past Nympsfield. Among other things, this also avoids peak congestion currently experienced by service 61 between Stonehouse, Ebley and Stroud.

It will also retain the hourly link today provided by service 61 between Dursley Cam and Stonehouse, including the major employment sites West of Stonehouse. From there it will continue every hour to provide and enhance the through links to Quedgeley and Gloucester offered today by service 60, but only every 120 minutes. In so doing it will also pass substantial existing, committed and proposed development south of M5 junction 12 including PS32 Quedgeley East Extension and PS43 Javelin Park. Given that the railway already offers a much faster and more regular link than service 60 does today from this area to Gloucester City Centre, the improved hourly facility to Quedgeley and Gloucester's southern districts is further improvement in service, on which the plan strategy and allocations including PS24 in particular can build.

We would see the baseline hourly links between the site Dursley and Stroud in one direction, and to Stonehouse and Gloucester in the other, being improved to operate every 30 minutes on a "stand-alone" basis: that is to say were no other development to be brought forward in the wider locality. Once committed development at Millfields and that also proposed in the plan at PS34 wisloe new settlement and PS25 (Cam North East extension) is considered, then it ought to be possible to envisage significant further augmentation to local service connectivity and frequency.

The sustainability credential for public transport are very substantially further reinforced by the immediate access to the Cam Station- the only station in the District on the Bristol-Gloucester/Cheltenham/Birmingham rail line. The attractive pedestrian and cycle connectivity creates an outstanding credible alternative to personal car use for longer-distance journeys.

Given this potential, it is important that direct pedestrian and cycle connectivity to Cam rail station is achieved, to best facilitate the very material opportunities for a significant number of off-site trips to be made by rail. The site is within 1200m of the station facility and a direct segregated pedestrian and cycle route is needed. If this can be delivered, the current lack of station Park and Ride capacity seems largely irrelevant.

The current hourly rail service is well established, and we note the use of this service has grown immensely in the last few years, demonstrating its relevance even in its current form. This links to a large number of key destinations to the north and south where both empirical evidence and the transport evidence base make plain a large number of peak journeys assign, especially to the south. The improvement of this service to run every half-hour as an extension of MetroWest Phase 2 within the West of England is one that the Gloucestershire Rail investment Strategy (GRIS) indicates is one of four key investment priorities for rail in the County, and one that is assessed to offer very high value-for-money.

The site also will benefit from attractive walking and cycling connections both for recreational use, but most importantly, for other regular journey purposes. Segregated cycle facilities already exist along the A4135 corridor east of Millfields and Box Road which will be extended further west towards the proposed allocation, and there is obvious and readily achievable scope to extend these further to and within the allocated site. As a significant urban extension, the site will be able to benefit from a relatively high level of trip self-containment, while for off-site demands, the relatively short distances involved greatly support high levels of active travel from the site, as well as bus use, especially with greatly improved frequencies being achievable from the development.

We suggest a minor change to the supporting policy text to make the plan more effective.

(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 PS24 should 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 be amended to read :

...

10. 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;

...

13. A bus loop through the site and bus stops and shelters at appropriate locations within the development to facilitate public transport permeability through the site; and bus stops and shelters at appropriate locations **adjacent to the development to access existing, and new bus services on the A4135, will provided at a suitably early stage according to an agreed public transport phasing strategy.** ~~and~~ Contributions **will be sought to extend and/or otherwise** enhance bus service **connectivity and** frequencies to key destinations including Gloucester, Stroud and Stonehouse; ...

(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:

