

## **Stroud District Local Plan Review**

### **Regulation 18 Preferred Strategy - Stagecoach West Response**

#### **1. Introduction**

Stagecoach West welcomes the further opportunity to formally examine and comment further on the emerging proposals for the longer-term planning of the District. We applaud the decision of the District Council to undertake a second Regulation 18 consultation, allowing further work to be presented in support of the emerging development strategy and the resulting proposed allocations, and allowing appropriate opportunity for this to be scrutinised and tested by a full range of interested parties.

We understand that the stated purpose of this round of consultation is to help the Council and a wider range of Statutory Consultees to collectively understand how far:-

- *How far the community and key stakeholders support the Council's preferred strategy for meeting Stroud District's future growth and development needs.*
- *What additional issues or constraints exist relating to the proposed sites, and how specific constraints, needs and opportunities should be reflected in the final site allocation policies.*
- *What further changes to the proposed policies are considered necessary, including specific things that should be included in supporting text.*

Our comments are thus advanced in two broad sections: a commentary on the Plan and its key supporting evidence base; and site-specific comments and observations.

Our site specific responses relate principally to the sites proposed for allocation. We strongly support the vast majority of the options that the Council has identified. Our observations are aimed at giving both the Council and a wider range of stakeholders, more confidence that we see a way in which the step change in public transport quality and attractiveness can be achieved, not just to the proposed allocations in question, but better serving the entire plan area.

However, given the depth of the concerns we continue to raise with regard to Sharpness Vale - the largest and most technically ambitious allocation in the Plan by a considerable margin - we also advance some considered views on two areas we had highlighted at Issues and Options stage, where we continue to believe that clear potential is likely to exist for sustainable development to be delivered, that aligns much better with the Council's overarching spatial strategy, and are likely to much better address the challenges that are driving the Plan's Strategic Objectives. We now are aware that sites in both areas are available, and under active promotion.

#### **2. Structure of the Plan- Strategic policies**

Stagecoach recognises and applauds the level of diligence that has been applied to plan-making, both in terms of the process of plan-making, the approach to the evidence base, and to the content of the draft plan. This in most respects materially exceeds the time and effort that other authorities have generally made.

The Draft Plan is unusually comprehensive goes into a great deal of detail, and unusually, sets out policy in at least three "tiers" of detail, even before one considers the articulation of Strategic

Challenges and Objectives, and the general development management policies. Much of this can and should be viewed as a welcome and thoughtful response to the particular nature of the challenges and opportunities facing the Council. This is reflected in a number of distinct policy approaches within the draft plan.

The focus on settlement clusters demonstrates a very sympathetic and at times quite nuanced approach to the different needs and characters of sub-areas within the plan.

The approach to creating flexibility for smaller scale growth in certain villages is a carefully considered one, and is a good example of the care taken by officers, as is the exemplary approach to other areas, such as self-build and community led development.

Notably, all allocations are treated in the same depth of detail, whether they involve 11 dwellings or up to 5000.

However the result is a very long document that in many ways is hard to follow, with relevant policies, particularly with regard to the development strategy and development allocations of a strategic scale, divorced from one another and from a clear spatial narrative and justification. As the plan approaches examination, we think it would be very useful and helpful to all stakeholders to pull together the strategic narrative and policies with the policies for strategic allocations, at least for sites over 150 units scope. This will help make much more evident how strategic allocations follow from the spatial vision and strategy, and effectively address the challenges in the District.

The National Planning Policy Framework makes explicit that plans should be “succinct”<sup>1</sup>. It goes on to require that they should “avoid unnecessary duplication of policies that apply to a particular area”<sup>2</sup>. Strategic policies should be clearly signalled in a plan: “Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed”<sup>3</sup>. These starting points do not always follow through to subsequent site specific policies. It goes on to say in footnote 13 that “Where a single local plan is prepared the non-strategic policies should be clearly distinguished from the strategic policies.” That is the situation in this case.

While we are less concerned that what is set out in the plan is spurious, we wonder if the structure of the plan might be carefully looked at to rationalise it significantly, in particular where the “settlement cluster” approach is used. This along with non-strategic allocations could be better placed towards the back of the plan. We wonder if allocations for fewer than 25 dwellings are appropriate at all, given the strategic policy suite, which would appear to provide clear and sufficient policy support for these, and indeed the basis for some other smaller unidentified sites to come forward, especially in Tier 3a-c settlements.

### **3. The Evidence Base for the Plan and its Development Strategy**

#### ***3.1. The justification for the development strategy: an overview***

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<sup>1</sup> NPPF 2019 paragraph 15

<sup>2</sup> NPPF 2019 paragraph 16 f)

<sup>3</sup> NPPF 2019 paragraph 21

We see that a great deal of further evidence has been advanced in support of the Plan, much of it in draft form. This, very importantly, includes the Draft Sustainability Appraisal of November 2019 prepared by LUC (SA 2019). From our perspective, the transport evidence base has been significantly broadened with the Draft Sustainable Transport Strategy.

We welcome this level of transparency, allowing some clear scrutiny before the pre-submission version is consulted upon.

We are aware that that Sustainability Appraisal is a statutory requirement under UK law, and an analogous process of slightly different scope is also required by EU law under the Strategic Environmental Appraisal Directive, which will separately be transposed into UK legislation as part of the process of leaving the EU. In line with guidance within NPPF, we note that the Council is satisfying both legal requirements together in the Sustainability Appraisal in support of the draft plan.

Too often, we find that Sustainability Appraisal work, and other key elements of the evidence base, are used to retroactively justify a development strategy that is driven by more narrow political concerns than the principles of sustainable development, not least those principles set out in NPPF. In these cases, the SA methodology and the evidence set out the Sustainability Appraisal and elsewhere is contrived and distorted, to retroactively justify a pre-determined approach to strategic allocations. This is entirely contrary to the purpose of preparing Sustainability Appraisals set out in statute in the 2004 Planning and Compensation Act, usefully quoted in paragraph 1.13 of the SA.

As the preparation of the West of England Joint Spatial Plan (JSP), and its subsequent Examination in Public made plain last Summer, this kind of approach cannot be legally compliant and therefore cannot be accepted by the Planning Inspectorate, despite the clear and public ministerial guidance issued in July 2019, that Inspectors should take a suitably “pragmatic” approach to examining plans. Stagecoach made plain its alarm that the SA advanced in support of the JSP was inconsistent, and the weighting given to transport-related issues in particular seemed to be so low. A consistent, robust and appropriately balanced evaluation of the reasonable options for development is essential, to give all stakeholders confidence that the outcomes of the plan, if delivered, support and serve to “maximise” the opportunities for the delivery of sustainable development, and do not undermine it. In particular, the SA process should show how the plan strategy and spatial approach can demonstrably address the transport-related Strategic Challenges and Objectives of the plan.

### ***3.2. The Transport Challenges in Stroud District***

The challenges facing the District relating to transport are very plain from the supporting material, not least within Chapter 3 of the SA Final Report, but also in other key parts of the evidence base. This includes both the Sustainable Transport Strategy (STS) published in November 2019 in support of the Plan, and the Settlement Role and Function Study Update (SRFSU) published in May 2019.

These include:

- Exceptionally high levels of car ownership and use, with some of the UK’s highest levels of multiple car ownership per household in the UK
- Very high levels of out-commuting from the District: over 50% of journeys to work

- An average journey to work of 17 km: well above that which can be substituted by walking or cycling, especially given the challenging topography within and surrounding most of the largest settlements
- A relatively limited public transport offer, and low peak time bus mode share: 2% for journey to work, half that of the County as a whole and greatly less than the UK average of about 7% in 2011.
- Serious current and incipient capacity pressure on key highways and junctions, not least on the SRN at junction 12 and 13 within the District; and junction 14 a short distance beyond it.

The results for the preferred strategic allocations, and other omission sites, are presented in Chapter 5 of the SA. The detailed matrices are set out in Appendix 7.

In essence, Stagecoach is quite concerned that the SA methodology and the supporting evidence elsewhere, is apparently set up at the outset, to “elide out” the very considerable variation exhibited between settlements, and indeed sites, regarding their ability to meet their own residents needs on the one hand, thus reducing the need to travel; and the degree of ease that residents can reach services and facilities beyond the settlement. We discuss the reasons for this concern in more detail in the sub-sections following.

### ***3.3. Transport Evidence Base and Sustainable Transport Strategy***

As we have already commented on within our response to the previous Emerging Strategy Consultation, Stagecoach unequivocally welcomes that the Council has taken steps to establish a proportionate and relevant transport evidence base to the Plan. It is essential, if sustainable development is to be achieved, that the opportunities for sustainable transport are comprehensively and robustly identified, and fully taken up. This requires that transport issues are considered “from the *“earliest possible stage”* as stated by paragraph 102 of NPPF 2019.

As well as our formal input to the previous consultations, we are happy to confirm that we participated in Summer 2019 in a single transport workshop event in support of the Plan with other stakeholders, including the County Council. This afternoon session allowed us to reinforce some of the points we had already made in writing. We note, too, that many of our previous written comments to the Emerging Strategy Consultation have explicitly been picked up in the Sustainable Transport Strategy Report (STS) published with this round of consultation in November 2019, on which we comment later.

The STS summarises the key movement corridors, and the opportunities and challenges to sustainably accommodate foreseen demands for movement arising from the Plan strategy. The STS seeks to draw together a very wide range of other sources of evidence, including the policies and strategies of a wide range of stakeholders.

Most significant of these is the County Council’s Local Transport Plan. This is currently under review, and formal consultation with the public started on 16<sup>th</sup> January, shortly before this consultation closes. This very short window makes it very challenging to fully distil its contents and the relevant issues with respect to the Stroud District Local Plan Review.

The LTP Review is a substantial one, and as a result much of the material drawn into the published STS from the adopted LTP is therefore subject to change. We note the County Councils comments

that *“The review strengthens the climate change agenda and reflects adopted (sic) Local Plans and their infrastructure requirements. It recognises the link between the newly introduced Local Cycling and Walking Infrastructure Plans (LCWIP). And the LTP Review looks towards a new time horizon, to 2041, to discuss future transport technologies and likely growth scenarios.”*

We will separately be commenting on the new Draft LTP4, covering the period to 2041 aligning with this LTP period. Like the current LTP, it comprises an overarching policy suite, supported by mode-specific thematic policies related to each mode. Then, further locally-focused “Connecting Places Strategies” apply these policy objectives at a more local level, having regard to the spatial and geographic distinctives of portions of the County. Stroud District is mainly covered by CPS5, the Severn Vale, but the functional interaction with the Central Severn Vale – the JCS area – means that CPS1 is at least as relevant to the Stroud Local Plan, not least to those parts of the northern fringe of the District that interface with Gloucester City.

**It is absolutely essential that the Local Plan Review responds to the Draft LTP and transport evidence base, rather than the transport policies and initiatives being conceived retroactively to respond to Local Plan strategy that places little or no weight on transport matters in its formulation.**

Historically, the County Council explicitly took the approach that it would seek to “retrofit” transport solutions to Local Plan Strategies, without regard to cost or deliverability. This highly controversial approach was taken most egregiously in the case of the JCS, with the result that an extreme version of “predict and provide” was the approach taken to setting up the transport evidence in support of the JCS, with the actual scale and distribution of forecast traffic demands being such that even definition of actual mitigations, much less an assessment of their feasibility, effectiveness and costs, were extremely weakly articulated then and even now remain quite elusive. Indeed, the Council at the time made clear at the Examination in Public that it would not commit to delivering any of the packages broadly identified: it was “a package of transport intervention that – if deliverable - could be said on the basis of the modelling arithmetic to mitigate the traffic impacts of the JCS”, not one that would.

Stagecoach is clear that such an approach cannot be considered appropriate, nor can it present a sound basis for underpinning the Stroud Local Plan Review.

Very happily, the new LTP does not represent a crude rolling forward of the policies and approaches pertaining to date. In its foreword, the Draft LTP clearly states among other things, that *“Transport, and the decisions all of us make about how and why we travel, is key to reducing our CO2 impact. Gloucestershire recognises the urgency of this issue; the County Council declared a 'climate emergency' in 2019. In the light of this the LTP has developed new policy areas and strengthened target P1-14 - Reduce per capita transport carbon emissions. This LTP review has considered how to move towards a more sustainable transport delivery model. The plan seeks to optimise the existing transport network to full capacity, and recognises that we cannot build our way out of projected traffic growth.”*

It goes on to conclude in paragraph 2.3 ***“With expected traffic growth and the traffic generated by Gloucestershire’s growth ambitions Gloucestershire’s future productivity could be significantly impacted if steps are not taken to improve the efficiency of the overall mobility offer in***

**Gloucestershire.**” While noting that key highways project such as the A417 Missing Link and M5 j10 are still important priorities, for which funding has now been secured, paragraph 2.4 continues “*the significant growth expected in Gloucestershire up to 2031 and the emergence of equally ambitious growth ambitions beyond 2031, **simply trying to increase highway network capacity will be neither possible nor affordable. More innovative solutions need to be found that optimise all transport modes serving Gloucestershire.***” In para 3.5 it then states: “*Ensuring that the existing infrastructure is used to its maximum efficiency will be at the core of the future of mobility in the County. **This can only be achieved through a significant mode shift from the private car to public transport and active forms of travel.***” (Our emphasis).

The role of transport in supporting a lower-carbon future model of transport delivery, alongside a spatial pattern of development that is focused on sustainable movement corridors, is set out plainly at the start of Section 4 of the Draft LTP, which covers the planned growth of the County that will be identifiable in Local Plans. The emerging new LTP policy makes plain that the County as Local Transport Authority considers that “***new development should be allocated and supported at sustainable locations, with easy and cost effective access to public transport and a high propensity to walk and cycle. Development patterns that reduce the need to travel long distances and encourage active travel modes are an essential element of sustainable development.*** The location and nature of all new development, commercial and residential, has a major bearing on both the need to travel and how people choose to travel. **New development offers both a challenge and opportunity to improve local transport networks, better mobility for non-car users and active travel practices by overcoming barriers and improving connectivity, whilst taking due regard for vulnerable users and compliance with the Equality Act.**” (paragraph 4.1.6)

We could not agree more, as the corpus of these representations ought to make abundantly clear. This stands in stark contrast to the explicitly “transport agnostic” approach to planning for the transport demands of new development that was taken by the County Council until recently.

It continues: “*Failure to manage travel whilst encouraging development will result in worsening and expansion of (the extent impacts of traffic volumes on) existing congested networks, if appropriate levels of mitigation are not secured.*” (para 4.1.7) **The concerns that Stagecoach has regarding the formulation and delivery of the Local Plan strategy largely arise from exactly this threat,** given the exceptionally damaging effects of congestion of public transport productivity, attractiveness and effectiveness.

Simply put, the transport policy approach and strategy adopted to support the last round of Local Plans in the County is no longer considered appropriate. We heartily welcome this recognition, which we consider somewhat overdue.

This discussion then is translated into Draft LTP Policy PD 0.3:

*“Where possible, **transport strategies arising in support of development should have regard to the potential to achieve betterment for trips originating near the development, and facilitate or synergise with priorities for investment with neighbouring authorities and transport providers including; Highways England, bus operators and Train Operating Companies. This should be considered on the basis of travel corridors, such as the M5, A46 or other locally strategic corridors.***”

This is followed by Draft LTP Policy LTP PD 0.4 – Integration with land use planning and new development:

*“GCC will work with local planning authorities to **make a positive contribution towards a step change in sustainable land use planning** and enable multimodal transport opportunities **with a clear priority towards sustainable travel choices**. GCC will support planning authorities and require developers, through agreements and securing of planning obligations; to mitigate against the impacts of proposed new development on the transport network and transport infrastructure...”*

The Stroud Local Plan therefore **needs to ensure that its spatial approach much more clearly and explicitly is tied to these core mode shift and capacity optimisation objectives and draft policies in the LTP.**

This is not merely a matter of responding to the Draft LTP. It is also an imperative that is explicit demanded by paragraph 102-103 of NPPF 2019: *“The **planning system should actively manage patterns of growth** (such that) **the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account** – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains”.*

At the moment the draft Stroud Local Plan Review barely acknowledges these imperatives in its discussion of challenges and Strategic Objectives, and fails to effectively and explicitly demonstrate how the draft policies and allocations serve to achieve them.

### *3.3.1.Key Sustainable Mobility Corridors in Stroud in the Draft LTP*

For road based public transport, Draft LTP paragraph 5.15 states the priority of County for the Central Severn Vale, spilling over towards the northern communities in the District, will be to realise the following key priority: *“**Local bus services will be further strengthened through significant investment in bus priority measures, a high quality vehicle fleet and improved accessibility through mobile phone apps providing real time information and integrated ticketing solutions. Strategic interchange hubs at all M5 motorway junctions, all railway stations and some other key locations will link the core public transport corridor and these high frequency, high quality bus services to long distance travel opportunities.**”*

For the Severn Vale within Stroud District, this is mirrored by paragraph 3.50 stating *“All four rail stations in the area will develop into strategic interchange hubs, ensuring easy access to major urban centres in Bristol, Swindon and London, as well as the Gloucester and Cheltenham City region. **High frequency bus routes will connect these stations to larger settlements**, including potential new settlements in the Sharpness area...” (para. 3.50) “**An additional rail station or sustainable transport hub for high frequency bus travel could be provided between Stonehouse and Gloucester to take the pressure off of the network** which, if the station or hub was not provided, would result in residents having to travel north or south into Stonehouse or Gloucester respectively for sustainable onwards travel. Residents in the south of the area may benefit from additional stations outside of the county boundary for travel to Bristol and the South. (para. 3.51).*

These objectives are highly relevant to the District, and the potential to transform public transport connectivity in Stroud, not just for local journeys but the kinds of longer-distance travel that reflects existing and likely future patterns of movement in the District and across its boundaries. Stagecoach

is already committed to investing to deliver against all these priorities. Indeed, our recently-relaunched App already provides a moving map display as well as real-time information, and smart ticketing.

**It has to be stressed that for bus and coach to deliver both the capacity and quality of service required to meaningfully divert a significant proportion of trips currently made by car, will demand a huge boost to outputs. Service frequencies on the existing key core bus corridors will need to at least double. Entirely new services will need to be provided, both within the District and in particular cross-border towards Bristol from the largest settlements, along the A38 and/or M5.**

Looking at the County's Draft LTP and the Public and Community Transport Policy Paper, this suggests that a great many bus services in Stroud District need to be uprated from the "Tier 2" category in the Bus Network Strategy to "Tier 1" status: commercial routes of at least 30 minutes frequency. (Table C Page 15). It is regrettable that specific corridors identified for augmentation in support of the LTP objectives all lie within the JCS area: a point that we will be putting to GCC officers directly, shortly. We believe that the Sustainable Movement Corridors within the Stroud STS, and an additional one we identify between the A38 and Wotton via Charfield and Kingswood, should be included as specific areas for intervention in the new LTP.

For these reasons, and others, **we see a compelling case to extend the "rapid transit" corridor that in the Draft LTP terminates at Hardwicke, south into the District along the A38 past Whitminster, at the very least to Stonehouse/Great Oldbury, but also to Stroud.** This could make use of the targeted re-assignment of general traffic towards the A419 Ebley Bypass, leaving the original route through the heart of the built-up area as a sustainable access spine, prioritising efficient and reliable movements by walking, cycling and bus services, both local and longer-distance. We had previously signalled this to the Council, and we will continue to stress the importance of this opportunity to the County Council in the days ahead. It could also leverage development opportunities in the Plan east of the M5 at junction 13 (and facilities associated with the proposed new Football Stadium), or other significant possible opportunities to the west, on which we comment elsewhere at more length.

Gloucestershire Draft LTP also sets out a clear aspiration to strengthen core public transport corridors by greatly improving interchange with last mile modes of all kinds, now and in the future, not merely focussing on Park and Ride, which are effective only in a much more limited range of contexts. This is set out in the Public and Community Transport Policy paper at Section 8.1.1-8.1.2:

*"Gloucestershire has plans to move towards an interchange model, which is multi-modal and encompasses car share, community transport demand responsive services, bus, rail and bike interchange facilities. These Interchange Hubs will support housing growth pressures, urban traffic congestion, carbon emissions and rural transport challenges.*

*...Transport Interchange Hubs are the future new model to replace existing Park & Ride facilities and consider additional locations. These hubs should be located on strategic rail or bus corridors where existing commercial super high frequency services (core super routes) and frequent services (high frequency) are in place. In addition, Strategic Interchange Hubs will become a vital transport strategy at interchange points on the highway network, e.g., at motorway junctions, such as M5 J10 & J12*



*where the opportunities to remove traffic from the highway network is greatest and the potential to attract commercial bus services is viable in the long-term.”*

This approach is set out in Proposed LTP Policy PD1.6.

**We endorse strongly the Transport Interchange Hubs policy logic and vision.** Indeed we have been pressing for the County to look at adopting a policy focus of this kind for a considerable period. We see similar language picked up in the STS, which is very welcome, and one of the clear areas of emergent alignment between the new LTP approach and the transport strategy behind the Local Plan Review. **Adding a further level of definition to these is important and is something we are especially keen to work with District, County and Highways England officers to achieve.**

It must be stressed that these Draft LTP aspirations also are relevant to the cross-boundary movements originating within the District towards both the north into the JCS area, (including Cheltenham with a proposed facility on the A46 north of Brockworth that would be relevant to many District residents) as well as to the south that use M5 j14, within South Gloucestershire. A local interchange hub at Falfield serving j14 has featured for some years in South Gloucestershire Policy. As we comment elsewhere, strategic upgrades to local bus and longer-distance coach services are especially relevant to optimising the capacity of highway infrastructure in the south of the District.

We would however, urge caution should a view potentially be formed that buses will pay predominantly a local feeder role to rail within the District, and the inference that most mode shift would be to rail. For a start, a much larger number of railheads would be necessary within the District for this to begin to be logical. Nor are key destinations within the West of England or JCS area, conveniently rail-served.

Multi-modal journeys involve significant complexity in terms of co-ordinating operational delivery, which is at least as hard to effect as seamless sale and payment. Only where there are frequencies that are significantly more frequent than every 10 minutes, on bus routes and urban metro rail, are such journeys typically attractive, since connection related delay and risk is reduced to low levels. This is simply never going to be the case in Stroud District or indeed in Gloucestershire more broadly. Seamless public transport options offering competitive convenience against car use in the majority of cases of up to about 25km, will only be achievable within the scope of a single direct bus or coach journey. The Draft LTP seems to implicitly accept this in para 3.51.

We note the comments at paragraph 3.55 regarding Sharpness: *“However, **Sharpness is isolated in its location so would require a range of transport modes to serve external trips**”* (our emphasis). We have already made plain to the Councils, as a major rail and bus operator (including of trams and tram-trains) that **we see no business case for such links**, principally because this very isolation means that they could not credibly offer enough residents a sufficiently attractive and relevant choice to begin to defray the very high fixed costs of operation, whatever delivery model was used. We discuss this in greatly more detail elsewhere in our site-specific representations.

However, we strongly concur with the strategic transport vision that states at paragraph 3.55 *“The combination of the increased MetroWest (local rail) services, express bus services into surrounding settlements and new developments as well as dedicated cycling and walking networks ensures that **Cam and Dursley station is the focal point of the allocation sites in the southern part of the Severn**”*

***Vale and links to it should be prioritised and maximised to their full potential from future development.”***

**We strongly and unequivocally endorse this vision for Cam Station acting as a sustainable development and mobility hub.** Achieving it should represent a central tenet of the Draft Local Plan strategy, if it is to be compliant with NPPF policy in paragraphs 102-103. As far as possible this would include opportunities for sustainable development within easy walking or cycling distance of a substantially upgraded station and interchange at Cam, that exist at Wisloe Green and Draycott/NW Cam, as well as the consolidation of the NE Cam commitment, which the Preferred Strategy proposes, and that we strongly support. Achieving this will require substantial improvement of the station itself and access directly from the A4135 for buses and other modes, not least cycling. Even if walking, cycling and micro-mobility were to be the dominant modes to access rail services, by a greatly larger number of users, this would still serve to ensure that buses would be less prone to traffic related disruption arising from car-borne traffic, both in the immediate area and beyond. Box Road simply can no longer be seen as providing an appropriate route to access the Station in the medium or longer term.

It is very important to note the vision continues: ***“In addition to the rail network, the M5 will remain a key transport corridor with a number of express bus services operating on it allowing for regional and national travel. The express bus services can serve additional interchange hubs located at the junctions on the M5.”*** This significant potential is something we have been signalling to stakeholders for some time, and it includes clear opportunities at junction 14 as well as j13. In connection with this, the potential for a third eastern sustainable access corridor branch towards Charfield within SGC, and then Kingswood and Wotton under Edge within Stroud District, involving local and potentially longer-distance express bus and coach services, is one that we continue to signal strongly. This is covered in more depth in our site/corridor specific representations that follow.

Paragraph 3.48 discusses the Gloucestershire 2050 aspiration for the delivery of a bridge between Sharpness and Lydney. However it concludes that ***“However, the wider transport impacts of a third Severn crossing still need to be better understood.”*** We entirely agree. The text makes clear that the rationale for such an undertaking would be development-driven, much more than accessibility or transport-driven, and as such we would argue that it is a “solution seeking a problem to solve”. It is unclear if this is a rail or road bridge, or both. It is even more unclear how such a structure would assist sustainable access and movement demands from Stroud District.

### ***3.3.2. The future role of rail for journeys from Stroud District***

The County Council, like so many other authorities, has a quite clear, specific and ambitious vision for the potential role of rail, and how it would like to see both services and stations developed to improve the capacity and attractiveness of the railway to meet a wide range of travel needs more sustainably, while reducing the pressure of increasing travel demands on the highway network.

These aspirations as far as they apply to Stroud District have been covered in section 3.3.2 above.

However, there is particularly strong set of long-held aspirations for the railway in Stroud District. It is important that in plan-making, aspirations are not conflated with deliverable projects.

In particular, The County has clear aspirations for a very substantial increase in rail service frequency and connectivity, not least on the main north-south rail link through the District linking Gloucester with Cam, then Yate and Bristol. At paragraph 5.13 Draft LTP discloses that County officers believe that *“The current trend of increasing passenger numbers travelling by rail will continue, with officers lobbying for a 20min service on the Bristol to Birmingham line stopping at Ashchurch, Cheltenham, Gloucester and Cam & Dursley, as well as a 20 min services from Cheltenham/Gloucester to Cardiff (Stopping at Lydney).”* This statement reads somewhat like a prophecy, which is inappropriate given that the document goes on immediately to concede that *“This level of growth will **only be possible, if supported by substantial investment in rail infrastructure** including the two passing loops listed in the LTP schemes list and substantial line speed and signals improvements.”*

Nationally, there is very wide evidence that the railway simply is not able to resolve and meet the number and nature of the demands that multiple stakeholders, not least the development sector, want to make on it; many of which are in technical conflict with each other. With rail passenger boardings in England at a historic high much on the network is effectively full, following several decades of strong growth fuelled to great extent by the incentives in early franchises for Train Operating Companies to build their timetables up to run as many services as possible.

The LTP Review includes Policy Paper 5 – Rail, devoted to this mode. This outlines the aspirations in a more holistic manner. It also makes clear that significant constraints exist on delivering these upgrades:

- Gloucestershire County Council has, in essence, a lobbying rather than any decision-making or funding role, which ultimately lies with the DfT which oversees Network Rail and the various operating franchises. This is admitted in policy Paper 5 at paragraph 1.1.5, page 6.
- The network planning system and processes within Network Rail are complex and are undergoing major structural change. The transparency of projected dates for delivery under the new Continuous Modular Strategic Planning Process seems lesser than the previous planning framework. The funding and delivery of the vast majority of such investment is, of course, in the hands of Network Rail, whose delivery programme is constrained by nationally-set budgets and wider regional strategies at a wider-than-local scale, which unavoidably informs both prioritisation and the business cases for any specific interventions.
- Evidently, local aspirations are held in significant tension with these larger scale constraints. It should be noted that a 20-minute frequency is significantly higher than the current aspirations set out for a possible extension of MetroWest Phase 2 beyond Yate, which looks to a 30-minute frequency between Bristol and Gloucester/Cheltenham as noted in Draft LTP para 3.49. Even the MetroWest phase 2 extension has the status only of a potential project, for which the Council is lobbying with other stakeholders, rather than being a committed scheme.
- All the stations within the County are surrounded by significant physical constraints on expansion, particularly of car parking, but also of significant inter-modal upgrade. Most are also quite disadvantageously placed with respect to key central area destinations, and centres of population.

Draft LTP Policy PD5.1 Rail Infrastructure Improvements makes very clear that, however clear the aspirations are, the delivery of any of them within the next 10-12 years at least is open to

considerable question, since none are actually programmed or committed for funding. This includes a half-hourly extension of the MetroWest stopping service beyond Yate north to Gloucester via Cam. Policy PD5.1 makes clear the best to which the County can commit is to: *“Explore with Great Western Railway and Network Rail the most effective approach to station development and stopping patterns at Cam and Dursley on the Bristol-Gloucester route.”* Similarly, *“Third party proposals for an additional new station south of Gloucester will need to be accompanied by a robust business case.”* Such a Business Case, would, of course, be made not to GCC, but to the rail industry. To date no such case has garnered interest.

As far as the Sharpness Branch Line is concerned draft policy 5.1 goes as far only to state that the County will *“Protect the freight line at Sharpness for future use”*. This is no more practical value than the effective policy that the rail industry has had for the line for over 25 years. It falls short of even taking any evidenced view as to the feasibility of this, much less a commitment to a definitive project.

Simply put, improved services and facilities on the railway through Stroud District lie beyond the power of any local stakeholder to deliver, and there are no well-defined or funded rail industry plans at this time to bring any of the aspirations forward. Previous Local Plans had relied to some extent on a new station at Hunts Grove, an aspiration for over 15 years. This seems no further forward now than at the time the RSS for the South West was being advanced in 2005.

Given the way that the railway has been a key articulating and structuring principle behind some major aspects of the Local Plan strategy, not least the new town at Sharpness Vale, justified until very recently by the claims that it could be sustainably facilitated by the re-opening of the Sharpness Branch, this ought to give both the Councils pause for some very serious thought indeed.

We are aware that Gloucestershire County Council has commissioned a major study to evaluate the relative technical feasibility and business cases for a full range of projects and intervention on the railway in the County, having regard as far as possible to the rail industry and DfT’s larger scale commitments and project planning. We welcome this Gloucestershire Rail Investment Strategy (GRIS), which will sit alongside and no doubt help inform the final LTP. It will among other things, provide all stakeholders, including Local Planning Authorities and development promoters, with some very useful clarity – “a sense check” - on the relative merit and feasibility of potential projects. While we are apprised that the Final Report has been received it has not yet been published. This is disappointing.

However, based on our extensive experience and knowledge of passenger transport planning and operation across all modes, nationally, we would be quite astonished if the GRIS has concluded that re-opening the Sharpness Branch line to passenger rail services will ever present a justifiable business case, especially when to do so would prejudice capacity and frequency upgrades on the whole line between Bristol Gloucester and beyond, serving a vastly wider range of potential trip demands.

This should be contrasted, strongly, with the ability that both Councils have, alongside Highways England and ourselves and other bus and coach operators, to deliver high quality infrastructure to support an unprecedented step change in road-based public transport capacity and quality.

### *3.3.3. Stroud District Sustainable Transport Strategy*

Stroud District Council commissioned AECOM in 2019 to prepare a transport strategy document to support the Local Plan Review. This Sustainable Transport Strategy (STS) was published in draft form alongside this Consultation at the end of November 2019, a few months in advance of the Draft Local Transport Plan. The inability of the STS to fully reflect the LTP Review means that it is likely to require some significant further work and refinement to bring it more fully into alignment with it, as well as to take on board further more detailed input from transport stakeholders, including ourselves, we trust.

The STS also stands alone as a policy document with its own independent with its own discrete description of challenges and opportunities facing the District, and an equally discrete set of Strategic Objectives which while paralleling the LTP and Draft LT, are not the same, and serve to diffuse the potential focus that might be achieved by drawing more directly on the County Councils analysis and vision. The SDS simply does not sufficiently highlight to important high-level issues and imperatives that the Draft LTP does: in particular, the unavoidable need to shift patterns of transport provision, decisively and significantly, away from single occupancy car use, which dominates travel choice today in the District to an unusually great degree.

It pulls together a great deal of relevant information, but it fails to develop a coherent and compelling narrative and solution set, that can then help drive the identification of the most sustainable development strategy options, and thereafter, allocations.

In so doing, the SDS in many ways is used to bend transport objectives and initiatives towards the chosen development strategy, rather than the other way round. This is both inappropriate, exposes the Local Plan to the charge of being ineffective and improperly justified, and is thus somewhat troubling. The most obvious example of this is the treatment of Sharpness as an appropriate strategic development opportunity, when the transport evidence, at least, far from demonstrates this.

However, the STS does manage to very helpfully draw together the content of the existing LTP with the wider background evidence of demands and pressures on transport networks within the District and to neighbouring areas. As such, it makes a very useful potential contribution to the defining more clearly what the Local Plan strategy ought to achieve in transport and accessibility terms, and how it might achieve it.

However, the Strategy needs to follow through to set out some key transport objectives and a clear transport narrative to justify the selection of the spatial strategy of the plan. Here a great deal of further work needs to be done, collaboratively with the County and other transport stakeholders. The Strategy summary in Chapter 5 is aspatial on the one hand, and entirely non-committal on the other. The content of the STS in many respects, beyond a general policy review, is the listing of a very long list of potential projects, rather than a set of deliverable, measurable outcomes that flow from a cogent and compelling analysis and vision. The STS, on Page 17, in fact suggests that the role of the Strategy is to define the “policy basis” for more detailed strategies for specific modes, including active travel and public transport.

The “Interventions” for bus set out on Page 19 go little further than re-stating some of the most recent broad national aspirations for bus, which while relevant and welcome, neither start to evaluate what is required and achievable with regards to the local challenges and the unprecedented scale of growth required in the District, nor start to define the key deliverables that would achieve those goals. This, like much of the rest of the STS, appears disappointingly like “kicking the can down the road”, and leaving the important tasks of defining outcomes and project scope, and designing deliverable solutions in response, for yet another day. If the Climate Emergency is a reality, this is time we simply do not have. Irrespective, by this stage, we would have expected this sort of work to be being done, in collaboration with us and no doubt a good many others. It has not been.

**The most useful contribution of the STS is to clearly define the Sustainable Movement Corridors that currently accommodate the bulk of travel flows, and which pose both the greatest challenges and the greatest opportunities to accommodating the current and future demands likely to arise by much more sustainable means** - something the Draft LTP Review also highlights. These also, encouragingly to some extent, reflect and pick up on a wider range of our earlier comments and inputs, both on the over-arching strategy and on specific potential allocations.

These corridors are limited in number and reflect the way that the physical characteristics and constraints of the District have especially strongly influenced patterns of settlement and movement, over many centuries. The result is that successive technological shifts have tended to reinforce the same broad network corridors, creating parallel networks: canals, railways, roads and so on. These fundamental constraints, and well-defined alignments of demand, greatly circumscribe both the ability and the need to focus on creating entirely new links. Not only that, but the Plan’s supporting transport interventions are able to re-purpose the historic canal and rail network to provide direct and potentially attractive seamless corridors for active travel, and potentially, micro-mobility, away from parallel congested roads. More recently, as we have previously pointed out, the construction of both the M5 and improvements to the A419 have created to opportunity to reallocate road space on the parallel historic highway routes, notably the A38 but also the former A419 within Stroud, to prioritise public transport and sustainable modes: potential that to date has been entirely overlooked.

These Sustainable Movement Corridors, shown on Figure 1 of the STS, all align with existing and potentially improved public transport provision.

They are:

- A38 Gloucester-Quedgeley-West of England CA area, passing directly through few significant settlements, but very close to Stonehouse and Cam/Draycott. The direct route and lack of intervening settlements lends itself to express bus and coach services, as we have previously highlighted, while key opportunities for Intermodal Interchnage at the nodes formed with the other Corridors and the SRN at junctions 12, 13 and 14 are also acknowledged, if not strongly highlighted.
- A419/B4008 Whitminster-Stonehouse-Stroud leading east from the A38 to the largest centes of population in the District. The combination of this with the A38 corridor to provide a direct longer distance public transport link from Stroud and Stonehouse towards Bristol is also set out as a separate Corridor in the STS: however, it should in or view be seen as a set

of objectives related to these in combination, and helping to catalysed synergies with bus and coach services along the A38 and M5, facilitated by optimally sited inter-modal interchanges, helping to anchor a sufficient level of overall demand to support a level of service that effectively meets a range of local and longer distance needs.

- A4135 Slimbridge-Cam-Dursley: a second west-to-east limb from the A38 also passing close to the only station on the N-S rail corridor at Cam, and leading to the second largest concentration of population.

These corridors are begged as the focus for both strategic development and comprehensive public and sustainable transport improvements; and align with our own previously stated views and advice.

In particular, we strongly endorse the conclusions in the STS for each of these corridors set out within Chapter 5, which closely reflect our previous input.

To these **we would add third lesser but important eastern limb leading from the A38 at Falfield across the M5a at junction 14 to Charfield within South Gloucestershire, before passing into the District West of Kingswood and passing a major employment focus at New Mills, before reaching the significant albeit rather smaller market town of Wotton under Edge.** There are already significant flows along the route, followed by the B4509 and B4062/B4060. These relate to trips of varying lengths including to and from secondary and post-16 education, employment within the area and beyond it, and retail, leisure and other amenities. While public transport along this corridor is today very limited in availability and relevance, we had some time ago identified the significant potential that exists here to kick-start a greatly more attractive level of service, particularly if it could be catalysed and anchored by additional development on an appropriate scale.

Much of this was until recently proposed within South Gloucestershire, at Thornbury, Buckover and Charfield, within the JCS. While the planning status of the most strategic options has fallen away with the recent withdrawal of the JCS, substantial commitments already exist at Charfield. Land for a further 250 dwellings at Charfield directly on this corridor is under active promotion, immediately adjoining and west of the County Boundary, for which we have already agreed a costed strategy to improve the bus service between Thornbury, Charfield and Kingswood to every 30 minutes, extending beyond to Wotton, and potentially alternately every hour to Yate.

Should development on a strategic scale come forward at either Charfield or Buckover, or both, the scope exists, alongside relatively easily-achieved extension of the MetroBus infrastructure up the A38, to further greatly enhance the level of service.

As we have consistently stated, **if public transport and active travel is to play the fullest possible role, the District's spatial development strategy will have to align as closely as possible to the District's transport strengths and opportunities. These all lie on the Movement Corridors, being both closest to existing concentration of population and activity, and the main flows between them. These Sustainable Movement Corridors should be seen as one of the key articulating principles of the Plans spatial development strategy.**

To focus strategic development away from the Corridors, more distant from these centres, and these higher-volume flows, is entirely unable to secure and capitalise on existing assets and services, and future potential for sustainable movements, especially by shared and public transport.

**It is regrettable that the opportunity to use the STS work, and the Sustainable Movement Corridors in particular, to clearly and explicitly steer and justify the Local Plan Strategy has not been exploited to the degree that it ought. Most of the proposed allocations relate well to the Sustainable Movement Corridors,** and if there were any doubt about this, we could suggest some detailed changes to provide further confidence and strengthen the structuring narrative significantly in support of most of the Plans strategic allocations.

However, the proposals at Sharpness Vale stand isolated and well adrift from the pink Movement Corridors in Figure 1 of the STS, tenuously clinging only to the very distant hope that the rail branch could be reactivated. As a result this part of the Plan strategy is a clear “dead-end”, sitting incongruously and quite uncomfortably within the STS, and the Local Plan itself.

### **3.4. Settlement Role and Function Study Update**

The Plan and its Sustainability Appraisal draws deeply upon evidence in the Settlement Role and Function Study Update (SRFSU) published in May 2019, 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 must be said 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, in fact, 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:** 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, with 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 Dursley	48 mins 41 mins	No
Minchinhampton	Tier 2	5/day	Cirencester Stroud	Varies 18 mins	No
Nailsworth	Tier 2	30 mins	Stroud	18 mins	Yes
Painswick	Tier 2	60 mins	Cheltenham Stroud	41 mins 9 mins	Yes
Wotton under Edge	Tier 2	120 mins 120 mins 60 mins	Dursley Thornbury Yate	24 mins 28 mins 50 mins	No; potential
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 Stroud	19 mins 12 mins	Yes
Eastington	Tier 3a	60 mins	Dursley Stroud	17 mins 32 mins	Yes
Frampton on Severn	Tier 3a	1/day	Gloucester	53 mins	No
Hardwicke	Tier 3a	12 mins 30 mins 30 mins	Gloucester Gloucester Stonehouse	23 mins 20 mins 15 mins	Yes
Kings/Leonard Stanley	Tier 3a	60 mins 60 mins	Stroud Stonehouse	14 mins 16 mins	Yes
Kingswood	Tier 3a	120 mins 120 mins	Thornbury Yate	25 mins 46 mins	No, potential

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

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 somewhat large distortions: 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 6<sup>th</sup> 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 shortsighted, 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. 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.

### **3.5. The Strategic Assessment of Land Availability**

The Sustainability Appraisal Report also draws very heavily on the outputs of the Strategic Assessment of Land Availability (SALA) to look at the relative merits of the specific development sites being considered, rather than the broader case for settlements to grow in principle.

The SALA methodology related to transport and accessibility *“rated the accessibility of sites by walking, car and bus in the District to town/district/local centres, employment sites and services and facilities that people may be required to access on a regular basis. Those draft site allocations which would provide development other than only employment (i.e. residential, mixed-use, etc.) and are*

*located in close proximity to the large settlements are amongst those which scored most favourably as part of that assessment work. These draft site allocations are considered most likely to help reduce the need to travel by private car in the District.” (SA section 5.15) This offers no great surprise.*

Given how few credible unconstrained opportunities exist to develop within or adjacent to the Tier 1 and Tier 2 settlements (many of the latter being within the AONB), the key issue for the plan-making process ought then to be how far other credible options existed within and adjoining lower-tier settlements, especially Tier 3a, particularly those endowed with higher-order service provision and nearby employment; and **also having regard to existing and potential journey time by existing or credibly-deliverable regular public transport routes to key large-scale employment and service concentrations**. Given the low public transport mode share, and high average JtW lengths as the very high level of out-commuting, the plans objectives will only be achieved having regard to these opportunities. Indeed there is no prospect whatever of achieving carbon neutrality with the current levels of car use by existing residents, never mind those within new development.

The SALA methodology is extremely crude.

It therefore is hardly surprising that the SALA methodology throws up the results set out at paragraph 5.15 of the SA 2019 Report, as it is unable to distinguish between sites that have bus stops within 400m (irrespective of the quality of service provided at the stops or the journey time to key destinations) and those that could offer high levels of public transport convenience to residents. The result is that previously developed land within the Stroud/Chalford Valley performs the best, despite the fact the level of service offered is no more than hourly, the service requires a steep uphill walk to access, and the services present neither a choice of arrival nor departure times, or even of destination (service 64 only serves Stroud Town Centre). The population hinterland of this service is actually relatively low and dispersed along the route, explaining why the timetable offer is at it is. We would add that much of this land, all falling within the Industrial Heritage Conservation Area, has been allocated for many years, in two successive previously adopted local plans, and has failed to come forward. We dispute that it is either particularly sustainable, or, in fact, particularly deliverable.

By contrast the extensions to Stonehouse and Cam/Draycott perform poorly. This is because they fall outwith the somewhat arbitrary 400m catchment of bus stops. No attempt seems to have been made to examine the committed delivery of bus stops (and more importantly bus services) associated with committed development, especially west of Stonehouse. The ability to see services extended, diverted or reinforced also seems to have been beyond the capabilities of the assessors.

The truth is, that the ability to see compact urban development and intensification on any meaningful scale, within existing built limits is entirely beyond the ability of the plan area to deliver. This has, of course been the primary focus of several successive rounds of plan-making for the last 20 years. The degree it was likely to be achievable, it ought to have been demonstrated over this period, especially given the prevailing approach of then-extant PPG3 between 2001 and 2009.

This being the case, the authors **needed to arrive at a methodology that could much more clearly differentiate between the existing and potential walking, cycling and public transport endowments of other sites**, whether adjoining or beyond the settlement limits of the Tier 1, and 3a settlements.

For employment sites, no attempt was made to understand if a relevant public transport choice existed **at all**. The assessment was tied to bus stops, not bus routes.

The methodology takes a very different approach to assessing the two existing proposed new settlement sites at Sharpness (PS36) and Wisloe Green (PS37), to other potential options. This is inherently **inconsistent methodology**, as other options have not been assessed on their potential to deliver substantial improvements to the sustainable transport endowment. PS21a North West Stonehouse, PS24 North West Cam, and G1 South of Hardwicke have demonstrable ability to help catalyse a step change in the availability of public transport not just relevant to the development, but the entire corridor served.

This exposes the fact that the **existence of current and potential high-quality public transport corridors have not demonstrably steered the formulation of the plan strategy**. Each site has been assessed on a *solus* and *stasis* basis. **This exposes that the plan has failed to recognise that the transport challenges and opportunities of the plan area relate to corridors, not to sites**, by their very nature, despite the fact that the Sustainable Transport Strategy advanced in support of the plan is structured in exactly this way, having regard to this reality.

Not only that, but the **actual deliverability of public transport measures in support of these new settlements was not appraised at all** by the SALA Transport Assessment.

At PS36, Sharpness, the site was assessed on the basis of a rail station (with indeterminate level of service) and express bus routes. The Sharpness promoter now accepts that neither is deliverable in the Plan period to 2041. **The result is, most importantly, the conclusions of the SALA and the SA about the sustainability impacts of the proposed Sharpness allocation PS36 are now open to the most fundamental challenge, from first principles.**

### ***3.6. Sustainability Appraisal Report***

The requirements of the SA process are set out clearly at the start of the document in section 1. It is notable that the methodology proposes as many as 16 thematic areas that it must specifically address. Transport is not one of them. Heritage (among many others) is. It is little wonder, then, that transport-related issues fail to register as centrally in the appraisal process as these other matters, despite the fact that many of the other categories have explicit transport-related dimensions; and that transport is proving to be one of the most complex areas to de-carbonise, with the result that even as its emissions reduce, its proportionate contribution is rising.

As far as transport is concerned - and sustainable transport modes in particular - the following SA assessment criteria are especially important:

***SA 6.1: Does the Plan promote compact, mixed-use development?***

***SA 10.1: Does the Plan avoid, minimise and mitigate the effects of poor air quality?***

***SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling?***

***SA 10.3: Does the Plan promote more sustainable transport patterns in rural areas?***

***SA 14.3: Does the Plan promote and facilitate the use of electric cars and sustainable modes of transport?***

We would add that SA requirements for economic development and socio-economic inclusion are also highly relevant in the formulation of a plan strategy that makes the “fullest possible use” of public transport to ensure that the most sustainable pattern and form of development is achieved, as also explicitly required by Paragraph 102 of NPPF 2019.

Given the limitations of the material on which the Sustainability Appraisal draws, outlined in the preceding sections, the origin of some of the very surprising assertions and conclusion of the document, and the draft policies in the Plan, start to become apparent.

The SA, drawing together a great deal of material that is at the same time both inconclusive, and also categorised and described in terms that make it even harder to draw accurate and substantiated conclusions, further compounds the fundamental difficulties and problems that arise in each of the contributing studies. The strategic approach is then very open to allocating growth, not according to clear evidence of relative sustainability, but other far less transparent criteria.

One good example of the mechanism by which this sleight is achieved is discussed in the SA Report at paragraph 2.35, where the revised approach to the Settlement Hierarchy set out at Core Policy CP3 is addressed. In this policy, the substantial relative variation between the settlement service and facility endowments both between settlement categories and within them, is reduced through the use of semantics, and a highly and unreasonably relativistic approach.

This is most clearly demonstrated by the language surrounding the settlement hierarchy in policy CP3.

Tier 3a settlements are said to be “those which have been identified as providing access to a **good range of local services and facilities.**” (our emphasis). From what we see in the Settlement Role and Function Study, in terms of the real requirements for regular and unavoidable trips (as opposed to discretionary and irregular ones), such a range is limited to a Primary School and some kind of convenience store.

It is clear that the distinction between Tier 2 and Tier 3a settlements has almost nothing to do with pronounced differences in their self-containment, or the level of credible sustainable travel options to reach a wider range of services and facilities beyond. In fact, even looking at self-containment, to all practical purposes the main difference between a Tier 3a and a Tier 2 settlement is the presence, or not, of playing fields and a Secondary School in the Parish.

This is further compounded by some particularly questionable assessments of service and facilities set out in the SRFSU. The distinction between the level of services needed to qualify for Tier 2, and that for Tier 3a is remarkably modest. This explains a lot of the results, and the difficulty of drawing clear conclusions that logically follow from clear evidence.

Many Tier 4a settlements, which are exceptionally small and in common parlance would be accepted as hamlets, devoid of much more function than as residential communities are characterised as having “good access to facilities and services elsewhere”. We have very little means to understand how such judgments have been made. By contrast for Tier 4 settlements, as paragraph 3.26 admits,

with the use of the car, a whole realm of options to access and facilities and services is no doubt available, even within a 5-8 mile radius: the statement describing the accessibility of Tier 4a settlements is therefore almost meaningless. The distinction between Tier 4a and Tier 4b seems rather to be related to environmental constraint on further development, rather than accessibility per se. However, as far as we can see, in practical terms, such access would in day-to-day terms, need to be by motorised means, and that would mean the car, in the absence of a “credible choice” of more sustainable modes.

What we do know, from SA paragraph 2.45, was that for all sites, the level of information used to assess the quality and relevance of sustainable choices was minimal. For employment and mixed use sites, the Strategic Assessment of Land Availability (SALA) methodology was used.

The statements in the SA regarding the likely achievability of sustainable transport link at each new settlement site, set out at paragraph 5.35, is not any longer fully supported by the evidence.

It is not true that: *“The new settlement at Sharpness would provide significant new sustainable transport improvements (including a new rail station and rapid bus services)”*. Rather, the promoter has made clear it will provide **no public transport offer at Sharpness**, either rail or road-based **at any stage in the plan period**.

Conversely, at Wisloe, the SA claims, with no evidence to back it, that *“the settlement at Wisloe would provide for less significant sustainable transport improvements (including connections to Cam and Dursley rail station and rapid bus)”*. Since the rail offer at Sharpness was realistically only ever going to provide a connection to whatever services were available at Cam and Dursley, the fact that this same station is likely to be immediately accessible to Wisloe by walking and cycling, points to Wisloe being inherently better endowed in rail transport terms, on even the most optimistic analysis of Sharpness’ potential. We have already made clear that Wisloe assists and consolidates patterns of demand to support high-quality inter-urban bus services in a way that Sharpness never could. In our judgment, as experienced public transport operators, Wisloe is greatly superior in this regard, offering the scope to catalyse greatly superior and more broadly significant sustainable transport improvements, whether rail, bus, coach or cycle, benefiting not only the site, but the full extent to the corridors concerned. We cover this in more detail in our separate site-specific representations.

There is a separate issue regarding access to secondary school provision. This is picked up on at paragraph 6.39, among other places, in the SA. In fact, neither Sharpness nor Wisloe is of a scale that would support a new secondary school, nor does either propose one. While Wisloe will offer public transport choices, and looks highly likely to be able to deliver a direct high-quality off-line cycle provision towards Rednock School in Dursley, it is entirely unclear how Sharpness will be provided for in this regard.

The SA is thus inadequately-informed, and demonstrates a regrettable lack of understanding on the realities pertaining even to these two strategic sites.

We would concur with the conclusions set out in paragraph 6.39 of the SA Report that: *“the policy approach set out through Policies CP2 and CP3 goes some way to provide a spatial strategy for development that could help to minimise the need to travel, particularly by private car. By concentrating large proportions of housing development at Tier 1 settlements where there is*

*currently the best access to services, facilities, jobs and infrastructure, there is potential to reduce trip distance and for a large proportion of trips to be made by more sustainable modes of transport.”* However our concern is that the basis on which key judgments have been made are ill-informed and at times, seriously flawed, especially with regards to Sharpness.

We have a wider concern that the plan simply hasn't picked up sufficiently on the opportunities to catalyse a step change in public transport provision and use, as is required by paragraph 102-103 of NPPF.

We also note the **SA Report makes no reference in the “Key Challenges” section to the need to enhance and prioritise sustainable transport to provide relevant choices to high levels of car ownership, out-commuting and car-dependence.** Rather, on page 36, the only opportunity identified is *“The re-establishment of the Cotswold Canals presents opportunities for the promotion of alternative modes of transport however there is a need to handle this sensitively”*. Presumably this refers to walking and cycling along the towpath. Any other interpretation, involving use of boats and barges to handle passenger trip demands, would be ridiculous.

However at Chapter 4 we agree with the conclusion that the Plan **could** achieve a substantial net positive benefit for the sustainability of the District, particularly with regard to climate change and pollution. Section 4.8 states *“Providing development at locations which would improve accessibility to employment opportunities as well as services and facilities should help to reduce the need to travel in the District, particularly by private car. A significant positive effect is therefore expected in relation to SA objective 10: air quality. A significant positive effect is also expected in relation to SA objective 14: climate change.”*

Given the Council's position on Climate Change, and the desire to achieve net carbon neutrality by 2030, this is even more pivotal to achieving the Plans most ambitious goal, expressed in new Policy DCP1. That is a long way from saying that the preferred option strategy **actually will** do so. It is accordingly vital that the SA robustly assess the options available to achieve the greatest possible reduction in personal car use, and the greatest possible take-up, in practice, of more sustainable modes.

The Sustainability Appraisal Process has no specific transport-related heading, while transport and movement impinge to a great degree on so many others of the categories under evaluation. Perhaps this explains the relative indifference to transport and accessibility among plan-makers, which this plan has failed to avoid. This contrasts starkly with the strenuous attempt to draw in complex data-sets on environmental and heritage constraints, as well as other aesthetic landscape and character appraisal considerations.

In reality, the SA process exposes the fundamental issue that the kind of development strategy and form that the Council seems to be seeking is still, at its heart “visually attractive” development, before all else. This is clearly not necessarily sustainable development.

Aesthetic considerations are, naturally, emotive, and being visually determined, often at the forefronts of stakeholders minds. Nor should they be treated lightly, much less set aside. However, the social, environmental and economic impacts of congestion and pollution are mainly invisible to



the eye. That should never relegate them to the typically subordinate position that they are here, as in so many other plan-making exercises.

**3.7. Conclusion on the justification for the development strategy: a basis for justifying a high level of future car-dependency**

**Without the evidence base and SA being able to evidence and draw clear distinctions between both the settlements and the specific site options, in terms of the credible choices that exist, or could exist, to take advantage of the highest quality of sustainable travel facilities, it becomes much easier to try to claim that dispersal of development to relatively remote rural areas, with neither current nor clearly deliverable sustainable travel choices, is appropriate, and is in fact sustainable and appropriate.**

**It also works quite effectively the other way around: the potential of relatively sustainable settlements can be hugely down-played, to justify overlooking those options entirely.**

All this should be viewed in the context of Draft Policy DCP1 “Carbon neutrality”, which in essence is intended to set the tone for the entire plan strategy. Achieving District-wide nil net carbon emissions by 2030 is extraordinarily ambitious. The achievability of this policy will stretch the imagination of all stakeholders to an extreme degree, if it is to be demonstrably achievable, as NPPF requires.

The SA follows this up in section 4 with the comment reflecting the Policy which states: *“Among the most significant of the policy’s criteria is a requirement that development must be located where it will minimise the need to travel, either through close proximity to essential services and facilities or through the actual layout of the development itself. Aside from the benefits in terms of mitigating climate change and reducing air pollution, there is potential for this requirement to ensure that residents within new developments can satisfy everyday needs within close proximity.”* (SA, section 4.56)

The opportunities to make fullest possible use of the opportunities for high levels of sustainable transport use in the Plan area are spatially very restricted indeed, reflecting the context of what is largely a rural district. These opportunities sit squarely on the Sustainable Movement Corridors set out in the STS, and which reflect the wider priorities and opportunities signalled in the County Council’s Draft LTP, just published.

Despite the obvious and compelling logic to using these to act as the scaffold for the Plans development strategy, the rest of plan’s evidence base, in particular the assessments of accessibility in the SALA and the SRFSU are extremely weak in identifying these opportunities. Indeed to the degree the wider evidence base attempts to look at sustainable accessibility, most notably in the Settlement Role and Function Study Update, the methodology and the data seem to be open to some serious challenge.

However, while these Sustainable Movement Corridors are relatively few, they do serve virtually all those parts of the District which host significant concentrations of population. Most importantly these corridors clearly offer the scope to radically more effectively serve existing and well as future patterns of demand. As such they provide an even clearer steer towards a sustainable spatial strategy than in more densely populated areas, where the baseline network density and overall service frequency level offered is so much the greater.

The SA and the supporting studies are fundamentally unable to distinguish properly and effectively between those site options able to take advantage of existing or potential relevant sustainable travel choices, and those that cannot. For the avoidance of doubt, an irregular shopper bus service does not represent such a choice, demonstrated by typically exceptionally low and declining levels of use, even by the elderly, for whom they are generally understood to be provided.

It is especially regrettable that the **SALA Transport Assessment clearly did not look at our already copious and clear input into where we currently provide the most regular and relevant bus services, on a commercial basis; nor where we saw the clear potential to greatly reinforce and extend the network of such services.** This is deeply concerning. It shows a very worrying lack of professional regard towards the consistent and vigorous efforts to which we have gone, to signal such opportunities to the Councils and, by extension, to their client team, both comprehensively, and at the earliest possible stage.

NPPF Chapter 9 “Planning for Transport” sets out at its inception to defined achievement of the transport-related strand of sustainable development in the clearest and simplest of terms: a strategy that *“focuses significant development on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”* Thus, the clear test set out in NPPF paragraph 102 is that the overarching strategy and strategic allocations **must demonstrate that this “genuine choice” of sustainable modes exists or demonstrably can be provided.** If not, the strategy, or site option, can only be considered car dependent, and this demonstrably unsustainable. Demonstrating this is not, in fact, conceptually or practically such a hard thing to do, especially if the input of the full range of transport stakeholder is sought and fully incorporated in the evidence.

NNPF does not stop there. It make very plain that *“where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development, should be identified...”*. Whatever the input of other transport infrastructure and service providers to the plan to date might have been, we have been singular on our focus of identifying just these opportunities, with evidence, as clearly and robustly as we can. While we see some use of this work in the Sustainable Transport Study, it is far from clear how some of the spatial strategy and the largest single allocation at Sharpness/Newtown, has been informed by robust transport evidence.

We are setting out here and elsewhere in or response further evidence, in much greater detail, to assist all stakeholders in this regard as part of this consultation response.

#### **4. Vision for the Future of Stroud District**

Stagecoach commented on the previous draft Vision.

Given new Policy DCP 1 it will require still more radical action, and a very much more ambitious – while demonstrably deliverable - vision and policy suite to address the transport-related issues within the District and across its boundaries.

For the plan to be effective, this vision needs to flow seamlessly through the document feeding in to an aligned and much more focused set of policies and supporting projects, that we are separately urging the County Council to set out its refreshed Local Transport Plan. The vision must much more

closely address the Plan's strategic challenges and Strategic Objectives. In so doing it will much more effectively support focused and deliverable policies, both strategically across the district, as well as to the growth allocations.

We still do not see that a clear enough vision for what sustainable transport needs to accomplish is firmly at the centre of the plan vision and objectives. The resulting strategy and supporting interventions as a result are not yet explicit enough, ambitious enough, and demonstrably prioritised with clear thresholds to measure and monitor success, to address the congestion, social inclusion, carbon emissions, and wider pollution impacts of the currently very high level of car-dependency in the District.

Just raising peak bus journeys to work to the County average of 4% implies a great step change in the attractiveness, relevance and use of bus services, especially at peak times, but also more generally throughout the day. Approaching the UK average figure of 7%, in a development with such compact larger settlements and clearly defined patterns of movement, is not likely to be impossible to achieve within a relatively short period, with an appropriate development plan strategy, focused collaborative work between the District and developers, the County Council, and bus operators.

## 5. Strategic Objectives

Stagecoach has previously commented on the draft Strategic Objectives.

What has become a great deal clearer, not least following the Council declaration of Climate Emergency and the governments wider legal commitment to carbon neutrality by 2025, **is that the Plan need to go forward on the basis of much more specific and clearly defined commitments to achieve sustainable mobility outcomes.** This is also clearly justified by the release, since the last consultation, of a great deal more updated and additional evidence, including the Draft Local Transport Plan to 2041, is that the focus on achieving greatly more sustainable patterns of movement (including to reduce the need to travel and distances travelled) and catalysing the delivery of radically more relevant and attractive sustainable travel choices.

This evidence is not just emerging from within the County. For example, the BBC has raised the latest academic study from UCL, that suggests that the outcomes of planning policy and development management processes have continued to hinder the development of attractive active travel networks across the UK. We can point to much more broadly-based research and analysis, including that from Greener Journeys, Transport for New Homes/Foundation for Integrated Transport, and the new professional guidance from the Chartered Institution of Highways and Transportation and Royal Town Planning Institution: *"Better Planning, Better Transport, Better Places"* published in August 2019. These point to the severity of the problems for all sustainable modes, and make a call for a substantial shift in planning practice.

Government is alive to these issues, and were it not for the recent election, we would no doubt have seen released into the public domain, a revised Planning Practice Guidance (PPG) for chapter 9 of NPPF; and a new draft Written Ministerial Statement on Development and the Strategic Roads Network, to replace DfT Circular 02/2013. Existence of these drafts is no rumour, and their emergence is imminent. We are very confident to signal that Government will shortly be expecting of the Council exactly what we urge.

There are **currently no Draft SOs within the Plan that seek to rebalance patterns of movements significantly towards more sustainable modes. Given the Council’s commitment to a 2030 net zero carbon target, and that emissions arising from transport and personal mobility are stubbornly high**, the Plan risks failing, quite catastrophically, in its duty to meet the single biggest political commitment its elected members have made, quite apart from failing to comply with much less ambitious national requirements and targets.

The new clear shift of focus and emphasis in Draft LTP is very helpful in this regard. It provides a much more secure policy basis for the District to work with the County and other stakeholders, including ourselves, on a collaborative basis, to achieve well-evidenced and well-conceived outcomes.

We continue to support the existing Strategic objectives, but only as far as they go. They show weak understanding of what is possible, and insufficient vision and ambition to avoid the perpetuation or even the acceleration of “business as usual” in terms of transport and movement.

*Strategic Objective SO1: **Sustainably accessible and connected** communities*

*Maintaining and improving accessibility to **employment**, services and amenities, **facilitated by a substantial increase in the relevance and effectiveness of sustainable modes of travel over car use, to support provision of:***

- ***High-value, low-impact economic growth affording socio-economic inclusion***
- *Affordable and quality housing for local need*
- *Healthcare for all residents*
- *Active social, leisure and recreation opportunities*
- *Youth and adult learning opportunities*

We note and support the second limb of this:

*Strategic Objective SO1a: **Healthy, inclusive and safe** communities*

*Developing communities that enable healthy lifestyles; promote social interaction; support the elderly, the young and the vulnerable; ensure public safety and reduce the fear of crime.*

**We also consider that the specific SO related to transport, movement and mobility is the most appropriate way of addressing this deficiency.** SO 4 shows no ambition at all: read at face value, it does no more than commit the Council to being some kind of marketing function for existing sustainable travel choices, rather than actively working to reshape the structure and functioning of places and their infrastructure, to *seeking* achieve radically different behaviours and outcomes.

The SO should acknowledge that while the Council needs to take an active rather than a passive stance, and that the planning system is one of the very few tools at its disposal to achieve these outcomes, this can only be done in collaboration with other parties that are empowered and able to deliver the infrastructure and services needed.

Given how far patterns of travel are dominated by journeys to work – at 17 km the District has some of the longest average journeys to work in Britain and at less than 50%, some of the lowest levels of

economic self-containment – for the Plan to be effective, and compliant with NPPF Chapter 9, the SO needs to add an explicit reference to meeting these objectives for journeys to work.

*Strategic Objective SO4: **Sustainable** transport and travel*

~~Promoting~~ **Support the delivery of** healthier alternatives to the use of the private car and **to facilitate** the much greater use of ~~reduce CO2 emissions by using new technologies,~~ active travel, public transport and ~~for~~ smarter choices **that substantially reduce congestion and greenhouse gas emission**, working **collaboratively** towards a more integrated transport system to improve access to **employment**, local goods and services.

## **6. Challenges to the Plan Strategy**

We have already commented on the challenges facing the District in the previous round of consultation.

The Council makes a number of statements and poses some specific questions in this consultation that warrant a further response.

### **6.1. Additional Reserve Sites**

In Para 2.26 the Council suggests that *“We may need to identify **additional reserve sites**, should the sites identified in this document not come forward at the rates envisaged, and we are interested to hear views on this.”*

This is in our view a very relevant and appropriate question.

The Council is faced with three parallel drivers bearing upon the deliverability of the development quantum, especially for housing.

The first is a near 40% uplift in the annualised rate of development, which takes effect on adoption of the Plan. This being the case, there is much less of a “stock” of permissions on previously identified sites than would be expected if the annualised quantum were to have been closer historically to the target figure. Achieving rapid rates of uplift, to sustained high levels, early in the Plan period, would be quite challenging in any event, whatever the development strategy and strategic allocations chosen.

The second is the reliance on a very small number of large sites. Both the government and the developer community concur that large sites, once they mobilise and settle into a sustained rate of output, can support higher rates of development over extended periods. However it is clear both locally and nationally, that the point at which housing output from large sites is realised involves both a substantial time lag and is relatively unpredictable. This being the case, large sites are especially prone to overly optimistic assumptions about the timing of first occupations in particular, which can easily take place five years of more after trajectory estimates. In these circumstances the trajectory rapidly collapses, opening substantial and widening housing supply deficits at a time when the need for new homes remains undiminished.

The greatest technical and commercial challenges, and the highest levels of complexity, seem proportionate to the size of the development on one hand, and whether or not the site is a stand-

alone settlement. Sites exceeding 2000 dwellings, that are also new settlements, show some of the highest levels of delivery “recidivism”. The current situation in the JCS area to the north, and in South Gloucestershire to the south, exemplifies this quite well. In the JCS area, strategic allocations of under 1500 units at Innsworth, Twigworth, South of Churchdown and Perrybrook have all now mobilised on site, albeit some years later than anticipated in the extremely optimistic trajectory. The largest and most complex West of Cheltenham and North West Cheltenham, have not. In South Gloucestershire, delivery of all but one of the largest strategic allocations made in the last plan has to date stalled. Smaller sites at Stoke Park, and Frenchay Hospital have nevertheless come forward. Current delivery has been reliant to a considerable extent on longer-standing strategic allocations at Filton North Field (Charlton Hayes) and Emersons Green East, allocation of which took place many years ago, and where delays following the 2008 recession have pushed delivery timescales substantially into the current plan’s scope.

The fundamental problems can generally be overcome at all through the application of very large amounts of government capital funding, if the issues can be resolved at all. This in itself creates a further problem given that even once funded, the capacity to deliver large and complex infrastructure schemes is nationally very stretched.

Whatever the relative merits of the strategic allocations proposed, especially at Sharpness, it is clear that commercial and technical challenges make it imprudent for the trajectory to be prone to significant slippage. Even a 2-3 year delay would involve hundreds of plots.

The third concern is the actual rate at which housing will be absorbed by the market at Sharpness PS 36 and Sharpness Docks PS35, if either site comes forward at all.

For this and other reasons, it is likely to be necessary to identify a selection of reserve sites, which, in line with the plan strategy, should be at the Tier 2 and 3a settlements. The nature of the challenges set up by the current portfolio of allocations actually leads us to the conclusion that sites that are solid candidates for this role, actually ought to be substantive allocations. One needs only to look at the situation in Mid Devon, where reserve sites in their Draft Local Plan are already needing to be called upon to meet housing needs, before their plan is formally adopted, and the Inspector’s report recommended these sites become substantive allocations.

## **6.2. Transport Impacts and Improvements**

The cumulative impact of a substantial increase in population and activity not just within the Plan area but adjacent areas, is a very significant issue, and one that is far from being appropriately highlighted in the plan itself, or the evidence base. It is, however, picked up in the Sustainability Appraisal at paragraph 6.77: *“As a whole, the development in the District and that in the surrounding areas, is likely to result in an increase in the number of trips being made regularly to commute or meet other local needs. As such, there is potential for both the minor negative effect and minor positive effect identified in relation to SA objective 10: air quality and SA objective 14: climate change to be increased to significant.”*

While some very limited modelling work has been done in SATURN to support the initial Regulation 18 consultation, there is no more substantial evidence base to help the Council, the County Highways Authority or indeed any other party, understand what the range of potential traffic

impacts is likely to be, dependent on arrange of scenarios and subject to further more detailed work understanding trip assignment. 2011 Census data is now almost a decade out-of-date. The housing market, as well as spatial patterns of employment and the nature of the housing market, have significantly evolved in this period. In any case, it is not appropriate to assume that patterns of travel associated with house purchase decisions made historically, perhaps up to 30 years ago, will closely replicate those that are being made now or that will be made in the near future.

As is made clear in the STS and the SA Report, as well as alluded to in the Plan itself, Stroud District has extremely low levels of self-containment for employment trips, with over half of such journeys leaving the District entirely. This doesn't just relate to the immediate proximity of Gloucester, whose functional built up area extends into the District at Hunts Grove and Hardwicke, and at Coopers Edge and Upton St Leonards east of the M5. The average 17 km commute for residents – an extremely long distance for this region – highlights large and no doubt increasing numbers of journeys exiting the District to the south and east. The limited rail service, and the even more limited number of stations, especially on the line to Bristol, mean that provide credible alternatives to car trips for these journeys, is an extremely important challenge to resolve, not only to deliver sustainable new development, but to meaningfully address exceptionally high levels of existing car dependence, this is essential if the Council swishes to meet its wider sustainable development goals.

The existing capacity of both the local and national highways network to accommodate current demands is clearly becoming challenged. It is the congestion, delay and unreliability that arises from this that is the single biggest threat to the sustainability of our existing bus services in the area and beyond: a point we must raise, loudly and often.

Para 2.27 of the Draft Local Plan indicates that such capacity headroom that does exist is very modest and incapable of accommodating future demands. As a result, *“Initial transport work has identified the likely need for major improvements at M5 junctions 12, 13 and 14, together with improvements along the A419 and A38 corridors. These improvements are likely to be required whatever the pattern of growth envisaged. Larger sites have more potential to help fund major infrastructure schemes and are more likely to attract public funding.”*

We have already separately indicated in rather more detail to both Councils what the existing bottlenecks are, that cause disproportionate delay and disruption to the reliable operation of public transport. They also cause by far the most serious problems in terms of localised air quality. The Plan, and the emerging LTP, would do well to start to address these known issues beyond acknowledging problems in general terms. There is no indication on the part of any stakeholder of what the Councils are seeking to achieve in terms of network reliability, and delay, much less a target to reduce single-occupancy car journeys.

This is typical of the conceptual and strategic weakness of policy within local plans in England. That the current review seeks to perpetuate the general but essentially undefined aspirations, without actively looking to identify and delivery means of addressing them, is very disappointing, especially given the scale of the known problems, and the Council's stated attempt to go further and faster than almost any other governmental body in the world, to achieve net zero carbon emissions.

There is no clearly stated ambition for public transport, nor clearly-stated strategic goals, related to the clearly expressed main movement corridors that are a key and enduring feature of the District.

First the canals, then the railway, and now the main highways and bus routes follow the same broad overall pattern, which is a function of the very distinctive physical geography of the District.

If there is to be a significant shift towards more sustainable lower-carbon modes, and public transport in particular, then it is these corridors that must be targeted to deliver:

- Higher service frequencies: at least every 30 minutes, and ideally double that on key corridors;
- Improved timetable coverage, with regular evening and Sunday services, but also earlier morning departures on core corridors;
- Much faster journey times overall, with end-to-end running times from major origins (including the strategic allocations) to key destinations - ideally under 45 minutes;
- Achieving bus productivity and reliability at peak times that is the same as off-peak, through the use of corridor-wide approaches to bus advantage and priority.
- The highest standard of bus stops and roadside infrastructure, complementing seamless digital strategies and off-bus ticketing and payment being rolled out by companies including ourselves

The statements in the draft plan are very much more vague and anodyne. Para 2.28 states in very general terms that *“Improvements to public transport will need to include increasing rail and bus services along main transport corridors and improvements to interchanges and to Cam & Dursley rail station.”*

The Plan, reflecting the current LTP, only starts showing any really specific ambition and intent when it comes to the railway: *“The Council continues to support the provision of an additional rail station on the Bristol-Birmingham main line. Sites at Bristol Road, Stonehouse and Hunts Grove, Haresfield are safeguarded in the current Local Plan for this purpose.”* Ironically, it is these specific projects that remain, after over a decade, no more than aspirations, rather than demonstrably deliverable infrastructure schemes.

We remain fully committed to engage with both councils to help sharpen up the vision for transport, and high quality bus and coach services in particular, and then help define specific interventions, with robust specification of outputs and costs, to create the framework for both the plan strategy and its required mitigations, and to give all stakeholders confidence the Plan is deliverable. This cannot simply be achieved simply by us attending an occasional multi-stakeholder workshop. The matters involved are substantial and will involve this or any other operator assuming potentially very significant commercial risks.

We would separately advise that we will need to substantially invest in expanded operational support facilities, including, in all probability a new depot, to substantially increase our operating mileage in the district and beyond to support the plan’s growth agenda. Such substantial capital investment needs a considerable amount of certainty that business case assumptions can be met. A suitably ambitious, clear and robust LTP and Local Plan policy suite will be essential to helping justify such a business case. Currently, neither plan gives us the requisite level of confidence.

### **6.3. Gloucester City’s unmet needs**



There has, for many years, been a difficult tension across the Gloucester-Stroud boundary. Two successive Local Plan reviews have made strategic allocations – the largest in either plan – directly adjacent to the City, at Coopers Edge (former Gloucester Trading Estate) south of Brockworth, and at Hunts Grove in Hardwicke Parish. Delivering housing within the District directly adjoining the City certainly is a highly sustainable strategy in principle. Indeed both these developments also benefit from being directly adjoining not just services and facilities, but some of the largest employment areas in the whole County, easily accessible by walking and cycling.

The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy preparation and examination exposed the degree to which the City has grown up to its boundaries. The unusually direct recommendations of the JCS Inspector regarding both Hardwicke Green (Draft allocation G1) and Whaddon (Draft Allocation G2) flowed out from the evidence presented at that Examination.

We note that the Council is taking the view that, despite the recently rehearsed evidence, Gloucester City will in some way in the immediate future, be presented with alternative potential directions that demonstrably would more sustainably accommodate the City's unmet needs, as part of the Review of the JCS that has just started. Accordingly, until the site are re-evaluated against other options in Tewkesbury Borough and Forest of Dean Districts, the Council will make no commitment to allocate either or any site to address this issue. Given that the JCS is at least a year behind the Stroud Local Plan Review, and probably further, it is very hard to envisage that any such evaluation will have been completed, leading to a renewed request from the City, at any stage before the final pre-submission Stroud Local Plan is published.

Stagecoach notes and welcomes the acknowledgement at Para 2.32 that the District is holding open the potential to allocate land at Whaddon to meet Gloucester's unmet need: *"At this stage, pending further work on the Joint Core Strategy Review, a site at Whaddon is safeguarded in the Draft Plan to contribute to meeting Gloucester's needs. Further work is required with our neighbours before the Local Plan is finalised to agree how Gloucester's unmet needs will be accommodated in full."*

The other site evaluated to meet unmet needs arising in Gloucester proposed allocation G1 South of Hardwicke ("Hardwicke Green") had not been included in the original draft of this plan for consultation. It has now been added, at a late stage. However we note that Hardwicke is proposed to meet the District's own endogenous needs, while Whaddon is, in effect, being considered as a reserve site should it be required to meet Gloucester's needs, but alternatively, in the same way, might also be brought forward to meet the District's own.

It should be noted that the strategic allocation at Hunts Grove, Hardwicke, accounting for up to 2500 dwellings if the existing commitment and the re-confirmed allocation are taken together, is to meet the District's needs, not make any contribution to meeting Gloucester's.

This creates a situation where, should all this quantum ultimately be allocated in the Plan, as many as 7000 new homes directly adjacent to the Gloucester urban area would have been provided between 2011 and the plan horizon date of 2041.

We must stress that we stand by a view that all these sites are, broadly, amongst the most sustainable options for housing within the Plan area.

This might then lead to a view being formed that the matter is in some way, wholly academic. However this would be erroneous. If these relatively sustainable locations on the edge of the City, very well related to existing employment and services as well as future jobs growth, are drawn down to meet the assessed needs arising within Stroud, this simultaneously sets up two problems.

First this would represent an unbalanced spatial delivery of new homes to meet the District's OAN. The new allocations would deliver at least 4450 additional homes adjoining the city. This represents somewhat over a third of the entire housing need of the District over the period, while, across a broad swathes of the District, there would effectively no delivery to speak of, such as in the Wootton cluster. The amount of development well related to Stroud, the largest settlement by far - and its closely related Tier 2 settlement of Stonehouse – would also be disproportionately low. The high level of physical and landscape constraints around Stroud in no way diminishes the housing needs arising from it, that ought to be met in reasonably close proximity, for economic and social as well as environmental reasons.

Second, the unmet need from Gloucester needs to be accommodated elsewhere beyond the City's boundaries: the requirement does not "go away". This is likely to be on sites that, given the known physical and other constraints affecting the JCS area, are likely to be well beyond the existing edge of the City, and considerably more challenging to integrate sustainably with the City than either Whaddon and Hardwicke Green. Indeed, in such a scenario, it would be ironic indeed, if screening of options across Stroud, the Forest of Dean and Tewkesbury, indicated that a new or expanded community south of the City in the Whitminster area were among the most sustainable remaining options, as indeed such an exercise might well, in our view.

We are consistent in holding a view that housing need should as far as possible be met closest to where such need arises. While we support both draft allocations, on the grounds of their inherent sustainability, we therefore doubt that the current approach to meeting identified unmet need from Gloucester is sufficiently justified or appropriate.

#### **6.4. Cross boundary interaction with South Gloucestershire and the West of England**

Para 2.34 of the Draft Plan states that: *"Growth and infrastructure improvements beyond Stroud District, but near to settlements in Stroud District, may have an impact on the final Local Plan. At this stage, the strategy for the south of the District (including growth and infill within settlements at Berkeley, Cam, Dursley, Kingswood, Newtown/Sharpness, Wisloe and Wotton-under-Edge) will require improvements to M5 Junction 14, but may also benefit from public transport and other planned improvements to services and facilities within this wider area."*

It is evident from a variety of data sources, as well as some of the evidence base behind the plan, that the functional interaction of the southernmost part of the District with the west of England is strong and, if anything, growing. This is true of the Wootton and Berkeley clusters, but also for Cam and Dursley. We note the trip assignment assumptions in the proposals for Sharpness Vale, which indicate an expectation that destinations in the West of England will dominate.

The Joint Spatial Plan for the West of England has now been formally withdrawn by South Gloucestershire Council (SGC), as well as the other participants, following the evaluation of it made by the Planning Inspectorate. While proposals at a strategic scale just south of the county boundary

at Charfield and at Buckover no longer have any formal planning policy status, it remains the case that meeting SGC's housing needs in the short term, may well require further releases of land outside the plan-led system, and given statutory Green Belt constraints, there remains prospects of further development coming forward, in the foreseeable future, immediately to the south of the District, albeit likely to be on a non-strategic scale. We have signalled to SGC and SDC, as well as other stakeholders such as highways England, that there is already sufficiently strong grounds to believe that a substantial uplift in public transport frequency and connectivity can be delivered alongside new development between M5 junction 16 and this area, alongside new development, to offer a credible and sufficiently attractive choice to be effective.

This is clearly highly relevant to addressing the current transport challenges in the Wootton cluster, and at M5 junction 14. Notwithstanding an agreed position regarding the comprehensive upgrade of this junction in due course, there is a need to provide the best possible public transport offer across the wider corridor, to mitigate the traffic impacts of committed as well as potential further releases in the shorter term. We have previously agreed a package of measures to upgrade the entire Wootton-Kingswood-Charfield corridor towards Thornbury and beyond, to a half-hourly frequency at least as far as Kingswood, with the potential to extend hourly from Kingswood to both Wootton under Edge and Yate. Over 300 new homes are committed or recently delivered in Charfield alone, to which a further application for 250 is on the point of being registered by SGC on land adjoining the district north of Wootton Road. This is reflected in the evidence base for the withdrawn JSP.

We have made previous clear representations on the nature of the cross-boundary opportunities in this area, including Kingswood in particular. We are now apprised that primary school capacity is identified as the biggest single constraint on any growth in the cluster.

However, we also note that the remaining elements of a very substantial employment consent, expanding the headquarters of Renishaw plc is now well underway. In addition to this, the Council is now proposing a further 10Ha to the west for further employment growth. The expansion to this already substantial campus, folding in a smaller existing site within SGC in Charfield, would allow substantial consolidation of the business from numerous smaller locations as well as growth.

Since it is likely that the primary school capacity could be resolved with the allocation of a proportionate level of growth, the proposed employment allocation at New Mills would complement and indeed help support the development of a smaller-scale focus of residential growth meeting the existing and future housing needs in the Wootton cluster, that clearly cannot be appropriately and sustainably met in Wootton itself, given the physical and landscape constraints on the town.

We have also signalled clearly the opportunities to provide a step change in the public transport offer between Dursley/Cam, and the south along the A38 and/or the M5. We note and welcome that these comments have been picked up in the Sustainable Transport Strategy. The focus of growth at Cam and Wisloe can take advantage of both the rail offer, but a road-based solution towards Aztec west and this part of the Northern Fringe, which is not rail-served, is likely to be essential is a comprehensive public transport offer is to be provided to and from these proposed allocations.

## 7. The Preferred Development Strategy

Stagecoach has always expected that the ultimate strategy that would be likely to be taken forward would involve a hybrid approach to some extent.

We welcome the intention stated in the Plan at section 2, as to what the Strategy intends to secure.

*2.12 “The strategy supports the development of inclusive, diverse communities, with housing and employment in close proximity and good access to wider services and facilities, to reduce our carbon footprint and to improve the District’s sustainability and self-containment.”*

If the strategy were to be demonstrably achieved this across the entire suite of policy and allocations we would have no doubt that this would represent an appropriate strategy, when tested against reasonable alternatives.

In fact, **in the main, notwithstanding how it has been arrived at, we strongly support the broad approach of the spatial strategy.** Examining the allocations and the evidence base for these we recognise that much of our prior input has been recognised in parts of the evidence base, especially the Sustainable Transport Strategy, and it is mirrored by the evidence coming before the Council from its own work, and through other parties.

We believe that the broad approach, to seek to allocate land for employment and housing following a “cascade” process starting with appropriate locations within the Tier 1 and Tier 2 settlements, then adjoining Tier 1 and Tier 2 settlements, before looking at new and expanded settlements in sustainable locations, is absolutely the correct one. We have been consistent in expressing such a view to the Council.

Therefore, the identified strategic allocations in Policy CP2 are, with two exceptions, considered to be exactly those that should be looked at, not least having regard to a deep analysis of the data behind much of the evidence base, and arriving at a rational disposition of land uses, that among manifold other considerations being weighed by the Council and covered in the Sustainability Appraisal Report.

Our strong concerns arise in the approach taken to identify appropriate locations for that quantum that simply cannot be accommodated within and adjoining the Tier 1 and Tier 2 settlements. Given the existing and likely future transport related challenges, that immediately apply as soon as the need for a more widely distributed approach is unavoidable, **we have urged the Council to focus on a “corridor” approach, that allows the strategy to be anchored to existing and potential high quality public transport corridors. This is exactly the same conclusion reached latterly by the Councils own Consultants, in the Sustainable Transport Strategy published alongside this consultation.**

Focusing development on a small number of key Sustainable Movement Corridors defined within the STS in this way, retains as far as possible the ability to site development in the closest possible proximity to existing and future activity and population, while ensuring that the credible choice of modes is available. In Stroud District, where the public transport offer is quite sparse, this also serves to create the density of demand that could catalyse an unprecedented increase in the use of sustainable modes of all kinds. By looking at developing the key A38 Sustainable Movement Corridor

highlighted by the Council's STS, and a subordinate arm to Wootton via Kingswood, direct, frequent and efficient bus and coach services could be provided, use of which by both existing and new residents could be leveraged to secure the fullest possible use of public transport, walking and cycling, as NPPF paragraph 102-103 intends.

Looking dispassionately at the evidence base now published by the Council, and in line with our own views and analysis summarised in the rationale above, there seems to be a particularly strong case for growth at two settlements, which stand out among all the other third tier settlements. This potential is explicitly highlighted in the Draft Plan itself at paragraph 2.16:

*"These (Kingswood, Whitminster) are villages that have a range of local facilities and already benefit from good transport links, or they have the potential to develop better transport links to strategic facilities at the nearby towns of Stroud and Wotton-under-Edge, where growth potential is limited by environmental constraints."*

To this we would add that Whitminster is also relatively close to Gloucester, and offers the immediate prospect of direct, frequent and relatively fast public transport journeys both to there and Stonehouse and Gloucester. The settlement lies directly on the Sustainable Movement Corridor of the A38.

We also would highlight the fact that the conclusion above with respect to Kingswood is drawn by the Council, despite the fact that the presence of the secondary school and leisure facilities is entirely overlooked. Equally, the Council places no weight, it seems, on the plans own draft allocation of 10 ha of further employment, consolidating the already substantial employment complex at New Mills within the Parish and a little over 1km from the edge of the village.

In terms of the spatial strategy, this potential is all but entirely overlooked, in favour of the expansion of Sharpness Docks (where there is virtually no pre-existing community) and a new/expanded community focussed on Sharpness/Newtown. These sites depart entirely from what is set out in the evidence base, not least, they are the only draft strategic allocations that lie well adrift of the Sustainable Movement Corridors in the STS, which should be the focus for growth. Here the Strategy purports to take advantage of *"the opportunity to transform local transport facilities through a new rail station with services to Gloucester and rapid bus services to main towns including Bristol;"* to create a large new settlement that, at full build-out beyond the Plan period, would actually become the District's second largest town. As we point out at length elsewhere in our representations, this potential is illusory. As one of the UK's largest public transport providers, both of bus, coach and rail services, we would re-state once again, unequivocally, that we see absolutely no realistic prospect of relevant public transport services by road or rail being deliverable to this area during the plan period. It is important to note that the promoter of the new settlement, in their latest submissions to the Council published with the consultation, entirely concur with this analysis.

This arises from the fundamental limitations of a new settlement in a location which, as the former presence of a nuclear power station testifies, is as remote as possible from major infrastructure and significant centres of population and economic activity, and lies well off-line of any existing or potential high-quality public transport corridor. The identification of this site, and its fundamental perceived underpinning virtue, is the abandoned freight branch line, reinstatement of which for passenger services is something that poses very substantial practical difficulties, especially when the

nature and operational requirements of the wider rail system in the District and beyond are considered. The promoter now appears to place no reliance on this for the delivery of 2400 homes in this location by 2041. It is important to note that a further allocation of 300 homes at Sharpness Docks, carried over from the current plan, has been the subject of two historic applications, but has not been advanced.

**We strongly support the other proposed new settlement at Wisloe Green.** This contrasts entirely with Sharpness, in terms of its scale, and its location. It is a new garden village of 1500 dwellings scope lying directly on the existing A38 and A4135 junction, amongst the most important nodes in the identified Sustainable Movement Corridors system highlighted in the STS and thus the existing and future high-quality bus and coach network, that would directly link Gloucester and Stonehouse with Cam and Dursley. The plan also signals the unique opportunity to provide longer-distance journeys sustainably, arising from the potential to make use of the only station in the District on the Bristol-Birmingham Main Line: Wisloe Green offers *“the opportunity to improve access to Cam & Dursley rail station and to local facilities for existing residents and businesses whilst protecting the setting of existing villages.”* (para 2.26) By virtue of its quite close proximity to Cam and Dursley, many day-to-day journeys out of the settlement could also credibly made by cycling, given the potential to extend an attractive off-road dedicated facility a little further west. **Compared with most of the other options, Wisloe represents a singular opportunity to plan for low-carbon, active lifestyles, in a relatively otherwise unconstrained location.**

Rather than pursue a “dead end” option at Sharpness, the wider deliverability of which must also be considered immensely challenging, we urge the Council to return to the core logic set out in its own evidence base: to examine the case for growth at the most sustainably located Tier 3a settlements, alongside the identified Sustainable Movement Corridors, where these demonstrably can meet the requirements set out at Paragraph 102-103 of the NPPF 2019.

**It is only in these locations that Stagecoach can confidently commit to delivering the step change in the attractiveness and relevance of public transport necessary to drive the delivery of the Strategic objectives of the Plan.**

Following from this, we believe that Land East of Whitminster could offer the opportunity for development of a new or expanded village-scale community on a similar model to that at Wisloe, while also accommodating 15 Ha of employment on a site that also accord entirely with the spatial strategy.

We also believe that Kingswood warrants significant and detailed attention, albeit to accommodate growth on a rather more modest scale, but sufficient to ensure that existing local infrastructure deficits, in particular primary school provision, can be tackled, while also transforming the availability and attractiveness of public transport from the village and the wider area.

Two strategic allocations are proposed related to the urban fringe of Gloucester. We acknowledge and understand the significant ongoing issues arising from the inability of the City of Gloucester to accommodate the housing needs arising within its own boundaries. We support the allocation of both. We cover the issue of what housing need these sites ought to address in or comments at page 33 above. **The Strategic Allocations**

We **strongly support** all but two of the strategic allocations identified to meet the objectively-assessed development needs of the District to 2041 set out in Policies CP2 and CP3.

Can North West 700 dwellings – **support**.

Cam North East Extension 180 dwellings – **support**.

South of Hardwicke 1200 dwellings – **support**.

Hunts Grove Extension 750 dwellings – **support**.

Sharpness Docks 300 dwellings – **do not support**.

Sharpness/Newtown 2400 dwellings – **do not support**.

Stonehouse North West 650 dwellings – **support**.

Wisloe Garden Settlement 1500 dwellings – **support**.

We over the reasons for this in our commentary each of the potential strategic allocations, that follows.

We note and welcome that, both through strategic allocations and through other supporting policy the Strategy seeks to achieve *“managed growth at each settlement, through a combination of site allocations and a policy framework that identifies an appropriate overall scale of growth, to be delivered through windfalls and other exceptions.”* However the key for us, is that the scale of growth identified and deliverable is indeed appropriate, reflecting the contribution of the resulting distribution to achieving a spatial strategy that concentrates development in those places that are, or can be made sustainable, not least in terms of providing a credible choice of modes to meet a large proportion of travel needs, as NPPF requires at paragraph 102-103. It is essential that such an approach does not in its effect, amount to an extreme dispersal policy, with cumulatively significant amounts of housing being delivered in a very large number of small settlements that would only substantially compound existing problems of car dependence.

We have been consistent that for the larger and more sustainable settlements, and especially those on identifiable existing and potential public transport corridors, there should be a more flexible approach to meeting development needs within certain parameters. Depending on how such parameters were set, this might also provide some scope to adding resilience to the housing trajectory, rather than specific reserve allocations. For example, if a half-hourly bus service is provided to at least one Tier 1 or 2 centre (or equivalent outside the District) reachable within 25 minutes this might present a criterion allowing a Tier 3a or 3b settlement to accommodate additional homes up to a fixed proportion of those existing, or alternatively, a notional growth ceiling.

Away from such locations, a much more restrictive approach is warranted. We recognise though that settlement of all size must be allowed to appropriately evolve, and blanket development ban in smaller settlements risks undermining their vitality and demographic balance over the plan period.

We note that the plan will continue to support smaller-scale windfall sites within settlement limits, as described in paragraph 2.49: *“Other housing proposals will be supported, in accordance with the Draft Plan’s settlement hierarchy, within settlement development limits and, in specifically defined policy cases, outside of settlement development limits. These additional elements of supply will deliver levels of housing growth above the minimum requirement, providing for flexibility and headroom.”* We support this broad approach, and agree that this is likely to achieve the effects intended.

This is established in draft policy CP3, which establishes, with helpful graphics, a graduated approach related to the categorisation of the settlement.

This of course assumes that the settlement category adequately reflects its innate sustainability, something that we question, having looked at the evidence in some depth. The relative ability of tier 3 settlements to meet travel needs without recourse to a car is especially poorly understood in our analysis, as discussed in our sections concerning the Plan’s evidence base, and thus the suitability of some settlements to accommodate growth without giving rise to further extreme car-dependency is either significantly over- or under-played.

We would also caution strongly against a blanket assumption that the smallest Tier 4 settlements could accommodate up to a 10% growth over the plan period, across the District, without creating a significant exacerbation of car-dependency and accompanying pressure on highways capacity.

It is also perverse that the most permissive approach to social rent housing is effectively focused on the smallest and least sustainable settlements. These have the fewest opportunities for employment and demand car use for each active member of the household to participate to any meaningful extent in wider society. We would strongly urge rural exceptions sites to be concentrated in Tier 3 settlements alone, minimising the likelihood of exacerbating wider social and economic exclusion. In fact, the most appropriate solution would be to rely on a suitably balanced spatial distribution of site allocations across the District, which ought to provide for adequate affordable housing within reasonable reach of existing family and job connections, without leading to a quite extreme dispersal of affordable housing provision.

This logic again would support a better balance of allocations in the south and central part of the District, at Tier 3a settlements including Kings Stanley, Whitminster and Kingswood, where significant likely improvements in public transport can be envisaged.

## **8. Local Economy and Jobs**

Stagecoach notes and welcomes the recognition that the current availability and distribution of employment has significant transport and accessibility implications, at paragraph 2.56 of the draft Plan: *“There is considerable out-commuting to work, which presents a big challenge if we are to reduce our District’s carbon footprint: as a rural district, many people are car-dependent, so we also need to ensure that access to jobs, services and facilities can be improved in the future and our chosen strategy must enable more sustainable forms of transport to be used.”*

We **support** all of the standalone employment allocations, each of which relate well to the existing and potential access and movement corridors identifiable within the District. This includes the new employment allocation added to this Preferred Strategy draft, of 10Ha at New Mills, in Kingswood,



which relates well to an emergent high quality bus corridor between Wootton and M5 j14, thereafter south towards Thornbury and Bristol.

This is equally true where strategic mixed use allocations, such as at Wisloe Green Garden Village relate well to these corridors, as most do.

#### ***Quedgeley East Extension 5 ha***

We support this allocation which is a logical rounding out of the current site and the commitment under construction by St Modwen. The site extends away from the B4008 and the current main Stonehouse-Quedgeley bus corridor, which will be retained in some form, and is likely to retain a half-hourly frequency if the whole network is augmented as the Plan seems to envisage.

However the opportunity exists for the bus route to run through the site to Haresfield Lane, crossing the M5 on the existing overbridge to link directly to the Hunts Grove Spine Road. This may offer scope for mode filtering in favour of sustainable modes, to prevent rat-running, and could provide an attractive bus route, if properly aligned. It is important that such an opportunity is fully explored and taken up. This proximity to Quedgeley and Kingsway is also a strong basis for its sustainability as cycling and walking represent a credible choice from substantial residential areas, damping demand for car use.

The consolidation of employment uses in this area and at Javelin Park is helpful to creating a critical mass of demands for bus services.

#### ***Javelin Park 9 ha***

We **support** this allocation. The comments we make above for Quedgeley East apply to a great extent to this site also, though the penetration of the site by bus services is clearly not appropriate or feasible.

#### ***Sharpness Docks 7 ha***

While some allocation to support existing port activity and existing employer may be justified, **we do not support** the allocation in principle. The site is all but entirely car-dependent and there is no credible scope to provide relevant and attractive public transport choices to this highly isolated location, which relates entirely to the historic operational requirements of the Ship Canal.

#### ***Sharpness 10 ha***

This allocation is made as part of the mixed use proposals at Sharpness Vale, which **we do not support**, for reasons outlined in depth elsewhere.

#### ***Stonehouse North West 5 ha***

This allocation relates to the larger residential-led mixed use proposals at Stonehouse North West, which we **support**. We cover our site specific commentary under the residential allocations.

#### ***Stonehouse Eco-Park (M5 J13) 10 ha***

We **support** this allocation, which lies adjoining an already committed public transport enhancement covering the wider area West of Stonehouse. Therefore, a baseline level of service in the short term is already assured.

We note that an outline application (S.2016/0043/OUT) for a wider area of land north of the A419 in this location, under the same promoter's control, has now received a resolution to grant permission for a Football Stadium and associated uses, which might be called in by the Secretary of State and recovered for his decision. It is not entirely clear to us if the proposed allocation relates to this site or land south of the A419.

By virtue of its location and the scale of proposed parking facilities the Stadium, if implemented, creates some potentially significant opportunities to achieve bus and coach interchange, including important potential to create some kind of "Coachway" operation, consolidating flows on the SRN onto inter-urban and longer-distance coach services. Whatever the ultimate mix of uses that emerges in this location, we urge that this potential is further explored and understood, and that the opportunities identified are secured through the Plan.

This is likely to involve a significant amount of collaborative work with the County Council and Highways England, as well as other long-distance coach operators, including Megabus.

#### ***Wisloe 5 ha***

This allocation relates to the larger residential-led mixed use proposals at Wilsoe Green, which we **support**. We cover our site specific commentary under the residential allocations.

#### ***Renishaw New Mills 10 ha***

Stagecoach recognises that Renishaw plc is one of the most important and well-established members of the economic ecology of the County and the District. It is an innovation and technology-led company, of vital importance to the prosperity of the wider UK economy. Its established headquarters is at Kingswood on a campus site that has seen steady planned expansion, which is ongoing. This is reflected in a further application for about 11,000 sqm of additional office space, which represents a reconfiguration of the balance of a previous planning commitment.

We note a further 10Ha to the west of the New Mills site has been proposed for allocation. This would consolidate an already important employment and innovation cluster. We understand that this is intended, less for Renishaw's own use, but to facilitate the co-location of a wider constellation of similar technology and knowledge intensive organisations and businesses, that can mutually support and draw on each other's expertise.

The site is directly on an emergent Sustainable Movement Corridor we highlight elsewhere in this response, between Wootton and Thornbury via Charfield. We have already committed, subject to pump-priming funding being released, to providing a 30-minute frequency along this corridor, and potentially directly to Bristol Northern Fringe, associated with an imminent planning application in Charfield for up to 250 dwellings.

The site is within reach of both Charfield and Kingswood by sustainable modes, at least in terms of close proximity. We have no doubt that substantial improvement not just of public transport, but

walking and cycling links, would be provided both by this promoter, and also, potentially associated with an appropriate quantum of new housing west of Kingswood, an opportunity we also highlight.

The strong potential complementarity of this allocation with a radically more sustainable pattern of travel, means that **we support this allocation.**

## 9. Core Policies

We comment here on the notable aspects of the main Core Policies, to the degree that we haven't already done so.

The most significant shift is the addition of the new Policy DCP1. This sets a whole new tone, with which the rest of the Plan and its strategy needs to be much closer in conformity, which we outline at length in our commentary elsewhere in this response. Otherwise the Draft Policy can only be ineffective, and thus unsound in planning terms. We have a real concern that the Council has yet to fully understand the implications of its own policy position in DCP for planning. Bolting such a Policy on to a Plan that is quite agnostic about transport, in most regards, risks a clear deficit in credibility opening up in this area in particular as the Plan progresses to examination.

For this reason we trust that the Council will consider our wider representations very carefully.

We suggest that the implications of the accelerated journey to net zero carbon are much more clearly spelled out in this policy as follows, to establish the basis for its effectiveness, and that of the wider strategy and Policy suite:

*“DCP1 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;***
- *...”*

We **support** the Council's commitment to plan positively for the objectively assessed needs of the District in Policy DCP2:

*“DCP2 Strategic Growth and Development Locations*

*Stroud District will accommodate at least 12,800 additional dwellings, 650 additional care home bedspaces and at least 50 hectares of additional employment land to meet the needs of the District for the period 2020-2040.”*

We set out above, in our analysis of the evidence base, why we have significant concerns about the manner and categorisation of the settlements in the District, particularly at Tiers 2 and 3. We believe that this categorisation does not consistently follow from the evidence.

We are the view that the settlements highlighted present significantly more opportunities for the use of sustainable transport modes than the other settlements in Tier 3a, while the others, in many cases, represent localities that cannot realistically accommodate any development without that development being fundamentally and unavoidably car-dependent.

We also disagree that the evidence shows that all these Tier 3a settlements are in any way equally constrained in their capacity to accommodate an appropriate level of growth. This part of the policy is unjustified by evidence. Those directly on the Sustainable Movement Corridors identified in the evidence base clearly are likely to represent much more appropriate locations for growth, including some on a more strategic scale, than those that are not. Thus we suggest that Tier 3a is split into two sub-tiers, with the existing tier 3b reviewed entirely to become Tier 4, with a decision then to be made if this then leads to sub-tiers within category 4 or a reversion to a Category 5.

### *DCP3 Settlement Hierarchy*

#### *Tier 3a - Accessible Settlements with Local Facilities*

~~Hardwicke, Chalford, Manor Village (Bussage), Brimscombe & Thrupp,~~

~~Eastington, Kings Stanley, Leonard Stanley, Frampton on Severn, Newtown &~~

~~Sharpness, Kingswood, Whitminster, North Woodchester~~

#### **Tier 3b – Settlements with local facilities:**

**Chalford, Manor Village (Bussage), Brimscombe & Thrupp, Eastington, Leonard Stanley, Frampton on Severn, Newtown & Sharpness**

~~“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. They greatly vary in ntheir ability to benefit from existing or potentially high quality links by sustainable transport. Tier 3a settlements These villages benefit from their existing and potential proximity and/or connectivity to higher tier settlements or transport corridors, which enables access to employment and key services and facilities elsewhere. Tier 3b settlements do not offer this scope. ...Accordingly some of these Tier 3a and 3b settlements outside the AONB may are likely to offer some have scope to help meet the housing needs of more constrained Tier 1 or Tier 2 settlements. However, their scope appropriateness to accommodate for future growth (in addition to any sites already allocated in this Plan) is constrained. variable, and dependent on several factors, including their ability to support much more sustainable patterns of travel.”~~

Stagecoach notes and broadly **supports** the content of Draft Policy CP5. We support a focused change:

#### *CP5 Sustainable Development Principles for Strategic Sites*

*“Strategic sites will:*

*1. Be built at an appropriate density that is acceptable in townscape, local environment, character and amenity terms*

- 2. Be low impact in terms of the environment and the use of resources*
- 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 distance of single purpose journeys by private cars, **and maximise the use of sustainable modes.***
- 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.”*

We note there is no change to existing policy DCP6 Developer Contributions.

## **10. Concluding Comments**

We trust that the Council, stakeholders and the wider community recognise from the depth and breadth of this response that we have a very deep interest and concern in the District, and that we believe that bus and coach services can and should play a much greater role in supporting sustainable economic activity and lifestyles than they are able to today.

Faced with the twin goals of accommodating an unprecedented level of development within the District, and the need to move as rapidly as possible towards a greatly more sustainable future, we applaud the Council's efforts to date with the Local Plan Review.

We would reiterate our strong desire and our on-going commitment to work as constructively as possible with the Council and its other partners to formulate the best possible strategy for the sustainable development of the District, and then, more importantly thereafter, to deliver it.

## Land at Grove Farm, and East of the A38, Whitminster

### 1. Introduction and background

As our core representations make clear, Stagecoach is most concerned that the Local Plan spatial strategy is formulated in such a way that pressure on the highways network is minimised, and the share taken by sustainable modes in meeting existing and future mobility needs is maximised. Quite apart from this being entirely in line with the Strategic Objectives, to reduce emissions and other pollution, and support healthier lifestyles and social inclusion, it is at least as important to ensure that added pressure on transport networks from development-related car-borne traffic does not seriously aggravate current and foreseeable congestion on the highway network across a broad area, further eroding our ability to provide reliable attractive journey options within an acceptable journey time.

We have signalled, clearly and consistently throughout the evolution of the Local Plan Review strategy, that we recognise the following key issues:

- Physical and other landscape constraints make it practically impossible for the largest settlements of Stroud and Dursley to grow
- There is significant and growing pressure on both local and national strategic highways capacity, while the connectivity, capacity, frequency and availability of public transport options, both road-based and rail, is quite limited.
- There is a need to ensure that the current patterns of longer-distance out-commuting by car are contained and reversed.
- This arises to a great extent from development pressures arising from both Gloucester in the north and the West of England/Greater Bristol in the south, to a great extent arising from house price differentials.

The above factors, signalled clearly by the Council themselves in their previous and current consultations, when looked at in the context of Chapter 9 of the National Planning Policy Framework, beg a spatial strategy that locates development as close as possible to employment and service centres, while, as far as possible, ensuring that radically more attractive public transport options are available to meet these travel demands.

The spatial architecture of such a strategy is picked up quite clearly in the evidence base for the Plan, published in support of this second Regulation 18 Preferred Strategy consultation. In reality, existing and future patterns of movements are clearly related to a very limited number of corridors, reflecting the very strong physical attributes of the District and spatial distribution of population and movement that arises from that. These are picked up very clearly in the County Council's Draft Review of the Local Transport Plan, and in the Council's own Draft Sustainable Transport Strategy, in which they are referred to as Sustainable Movement Corridors (SMC). There is a single north-south SMC in the Vale beneath the Cotswold scarp, with two (and in our view three) branches that run to the east up the main valleys to the key market and former industrial centres in the valleys. This is represented well in Figure 1 of the Sustainable Transport Strategy.

It must be stressed, as we do in our main representations, that there is neither a sound logic nor functional relevance in trying to create mass transit mode improvements that do not align with

these corridors. In the Stroud context - where current service frequencies are relatively low even on the core routes - it is even more vital to focus attention on building these corridor up to a point where service frequency, directness and reliability makes public transport use highly competitive with car use. Trying to create what in effect would be entirely new corridors or branches, that do not align with existing movement corridors is an exercise doomed to failure.

We are encouraged that many of our own prior comments have been picked up and explicitly quoted in this evidence base, most notably the STS, published with this round of consultation. The document among other things usefully summarises the existing and emerging County Council transport priorities and projects for delivery in support of them.

Arising from this evidence, and our own understanding of how the most relevant and effective public transport can be secured gained locally and nationally over many years, we made clear to the Council that, after the capacity to accommodate development rationally and sustainably in the Cam and Stonehouse areas had been reached, which are closest to existing centres of population and services, one or more new settlements or expanded villages were likely to be required. These would be most sustainably located on the A38, where good public transport connectivity could be provided, also serving to substantially boost the quality and relevance of bus services to the existing population.

We also pointed out that as a former trunk road, there was a good deal of scope within the existing public highway, and to a great extent within the current carriageway pavement, to provide bus priority measures on the A38. This has separately been identified and acknowledged by the Sustainable Transport Strategy at section 4, with This then leads to the parallel conclusion drawn at Section 5 that on the character and nature of the A38, *“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.

## **2. Whitminster and its location**

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 south of Gloucester, including the existing and committed new employment found at Quedgeley on or close to the A38 Sustainable Movement Corridor. This means that, beyond the edge of Gloucester, the distances involved in travelling to employment, services and amenities both to the north and south can be minimised, compared with almost any other option, or, for that matter, almost any other Tier 3a settlement.

It has to be admitted that the public transport options on this part of the A38 SMC today are very limited. However, as we have stated in a number of places elsewhere, this is about to change. The main link between Gloucester and Stonehouse is to be diverted to this corridor. Service 64 will provide, as a minimum, a 30 minute core frequency between Gloucester, Quedgeley, Stonehouse and Stroud, via Whitminster.

This revised core corridor which is acknowledged in the STS, will be highly amenable to further enhancement as that Strategy requires, even before new express bus services are considered running along the A38 and/or M5 towards the south. This is because the Preferred Strategy of the Local Plan envisages consolidating a substantial amount of further growth along this route corridor. This includes proposed Strategic Allocations to the north, at Hardwicke Green, consolidating committed development underway at Hunts Grove and at the former RAF Quedgeley sites for employment; and to the south east with Strategic Allocations for employment East of the M5; and for residential development at North West Stonehouse.

We separately identified and picked up on 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 by the Council's STS, which identifies, under the initiatives that should be progressed under the STS Corridor Strategy *"Express bus services between Stroud and Bristol, **potentially with an interchange point in the vicinity of the M5 Junction 13.** This 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 could be provided either east or west of the M4, of course. Indeed, east of the M5 we have 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 20<sup>th</sup> 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 diversion of the vast majority of traffic well away from the existing village, towards the east.

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. Land at Grove Farm and East of Whitminster**

We have been informed that Robert Hitchins Ltd. has presented information to the Council that indicates that it can deliver development on a range of scales, and incorporating appropriate infrastructure and complementary uses, on land north of the A419 (Grove Farm) and East of the A38, near Whitminster, directly on the confluence of the two main Sustainable Movement Corridors: the A38 and the A419/B4008.

The holdings under control are quite extensive and allow for a great deal of flexibility in what is developed, the disposition of land uses, and infrastructure, which presents a very helpful set of circumstances to identify and secure the most appropriate and sustainable form of development.

However, at this time, land flanking the A419 to the north, west of M5 junction 13, is proposed for 13.4 Ha employment-led development potentially including a bus/coach local interchange; and north of a landscape belt following the topography, a residential development of about 750 dwellings south of Grove Lane. Land is also under control North of Grove Lane offering a more extensive tract that could offer scope for about 1500 further dwellings and making further provision for services and community facilities. This could include a local centre sited between the existing village and the new population, and creating a significant new focus for the existing community as well as the new one.

Stagecoach confirms that in addition to the material submitted to the Council by the promoters as part of the evidence base to the Local Plan Review, we have been involved in very initial discussions with the promoter and their client team, in the last few weeks, to help identify the constraints and scope to maximise the opportunity for the use of sustainable transport of all kinds, and in particular the potential for a future strategic bus service corridor already identified in the STS as a key intervention, to maximise its effectiveness.

Consolidating a pattern of development in a series of locations, relatively close to one another and all linked by a single, logical and frequent high quality public transport corridor, is the only credible means of delivering a transformative impact to the public transport offer in this and the wider area. It is also entirely congruent with the evidence base and the wider development strategy for the District – much more so than the proposed allocations at Sharpness/Newtown.

It is clear that the land under promotion would be highly likely to deliver and secure the full range of policy aspirations for sustainable transport set out both in the County Council's Local Transport Plan and the District's Draft Local Plan Preferred Strategy as far as they relate to the A38 corridor and the immediate area between Quedgeley and Stonehouse. These include:

- ✓ Use of modal filters onto the A38 benefit sustainable travel modes.
- ✓ Rapid bus/coach services to key destinations such as Bristol

- ✓ 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 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 service and any long-distance express services using either the A38, M5 or both.

#### **4. Urban Structure and Public Transport Strategy**

The key opportunity arises from creating a node offering efficient and as close to seamless interchange as possible between the two Sustainable Mobility Corridors. The first is the N-S corridor offered by the A38 bus priority spine - and the M5 providing for longer-distance coach movements. The second forming the eastern arm of the movement strategy in the wider area, is the A419 – B4008 corridor linking to Stonehouse and Stroud on the other. Because this location west of the M5 would also be served by any direct services between Gloucester, Wisloe, Cam/Draycott and Dursley, it is practically the only site where all these service could come together without one at least having to make a very substantial diversion.

We offer at this stage, the following broad observations and advice:

- The opportunity for express coach interchange to a range of long distance destinations via the M5 can only be secured if the coaches can leave and re-enter the motorway with minimal diversion. This suggests an interchange is best located towards the junction, and no further west than the indicative access point off the A419 mid-way between J13 and the A38 roundabout. A separate coach access directly on and off the junction, with buses serving a separate route and touching the interchange from the west, might also be very worthwhile, maximising the likelihood that long distance services such as Megabus would be attracted to the facility.
- Grove Lane in whole or in part (west of the M5 overbridge) would allow buses to fully serve the southern part of the site, and potentially bypass the A38 roundabout. The use of this as a bus priority spine should be carefully evaluated. A bus-only gate (modal filter) to prevent rat-running is likely to be a very worthwhile focus of consideration.

- The creation of a new route for bus and coach east of the existing A38 could represent a means of delivering additional seamless bus priority, especially if general traffic were to remain on the existing route. The scale and footprint of development taken forward will greatly influence how far this is achievable or optimal. If it is done, care should be taken to avoid the existing settlement being left greatly further from stops than today, which suggests that drawing a route in behind the existing Old Forge Inn closer to the current A38 line might be expedient.
- The character of such a route, balancing carefully the movement and place function, could follow some of the approach recently taken at Wokingham Berkshire (Northern and Southern Distributor Roads)
- Alternatively, the A38 might be retained as the main route for general traffic, while a parallel bus and coach spine could be created possibly using modal filtering while allowing swift seamless through movements for bus and coach.
- Much depends on how far the development form would seek to integrate with the existing village, or “turn its back” on it. These are very significant questions that ultimately depend on the final view arrived at after a great deal of future discussion, of what the relative merits are of retaining the existing character of the village as it is, or seeking to enhance it through carefully planned integration across the existing A38 line.
- If it is considered that creating a new route for the A38 to the east, through the site, is appropriate, this could allow the existing A38 to be re-purposed, in part at least, as a sustainable modes priority corridor, with elements of the design approach taken at Monkton Heathfield, Somerset, being worth careful consideration and application as appropriate. Here the old A38 is now downgraded to act as a direct bus route through the enlarged community, with the new local centre and primary school directly sited on it to offer a community focus unencumbered by through traffic.
- Bus priority on the A38 to the north, to and through Cross Keys at Hardwicke and linking seamlessly to measures to be provided within Gloucester in the Joint Core Strategy area, will be vital to securing the overall effectiveness of the wider public transport strategy needed to support the Plan as currently envisaged. Should land at Whitminster be included in the Plan, this can and should make a proportionate contribution to securing this objective.

## **G1 South of Hardwicke, Hardwicke Court Estate (“Hardwicke Green”)**

Stagecoach confirms that in addition to the material submitted by the promoters as part of the evidence base to the Local Plan Review, we have had ongoing discussions with the promoter and their client team, over a considerable period, to help identify and shape proposals for the development, such that they maximise the opportunity for the use of sustainable transport of all kinds, not only existing or potential future bus services.

Stagecoach is concerned that the share taken for sustainable modes is maximised, not least to ensure that added pressure on transport networks from development-related car-borne traffic does not seriously aggravate current and foreseeable congestion on the highway network across a broad area, further eroding our ability to provide reliable attractive journey options within an acceptable journey time.

Stagecoach has made consistent representations, including to the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Examination, signalling unequivocally that this site is among the very best placed options that have yet to be allocated, in terms of meeting Gloucester City’s ongoing development needs, in a location that maximises the use of walking, cycling and public transport. Extending the existing city bus operation is relatively straightforward. The site lies adjacent to the existing main Gloucester-Stonehouse-Stroud service 64 corridor, operating up to every 30 minutes, which we can envisage being further strengthened in line with current commitments and proposed and potential development West and North West of Stonehouse.

At least as relevant, there are further exceptional opportunities to create links and synergies with the very substantial employment cluster at Waterwells, and east and west of the A38 all-but adjacent to the site, as well as committed residential development at Hunts Grove, which is now delivering at pace, and the Hunts Grove Extension allocated as Land South of Haresfield Lane in the current adopted Local Plan. If growth on a strategic scale is not to make excessive demands on limited highways capacity, not last on the SRN and junction 12, an uncompromising focus must be made on maximising the use of sustainable modes, and public transport in particular.

### **1. Development scope**

The proposed allocation is for 1200 dwellings, that lies south of Hardwicke and west of the A38. The historic settlement has a relatively intricate built form, but is dominated by clearly suburban form on land to the north. This includes an initial phase that could be provided in the shorter term immediately adjoining the eastern boundary and which would provide the initial length of spine road into the wider development. This has been subject to a recently withdrawn planning application for 175 dwellings on which Stagecoach has made separate representations and had direct supportive discussions with the promoters client team.

The proposals are evidently of a scale that would justify and sustain the local centre and primary school, which are proposed by the promoter. The proposed allocation will be able to take direct advantage of these facilities, as well as existing and proposed new employment immediately adjacent to the site. These could be made very readily accessible on foot or by cycle, and we would urge that these opportunities are forensically evaluated as part of the master planning exercise. However, major improvements to walking and cycling links, that would also allow bus services to

inter-operate between the site and other recent and committed large-scale developments are already being delivered in the immediate future as part of a major planned reconfiguration of the A38 overbridge and wider measures that are about to be constructed as part of the final phases of Hunts Grove.

The promoters consider the site has scope to appropriately accommodate a quantum of at least 1200 dwellings in total. Given the inherent sustainability credentials of the site, which is particularly well located with respect to the largest employment and service centres within the District, within reach of a station with mainline rail service without recourse to a car, and is already served by bus services on its northern and eastern margins, we would urge that the practical capacity of the site is made fullest use of. These credentials are well signposted by the site-specific template in the AECOM Sustainable Transport Strategy.

As discussed above, trip internalisation should be assessed in the round with the existing consent of Hunts Grove, and having regard to the adjacent employment at St Modwen Quedgeley West, as well as the very close proximity of employment at Waterwells.

There has been significant exploratory work already done to understand the opportunities and the constraints on the site and accordingly, the indicative master plan has evolved to a substantial extent to something that is reasonably definitive, demonstrating that the development is realistically achievable.

## **2. Longer distance travel demands: Hunts Grove Station and Waterwells**

Stagecoach is aware of concerns expressed by Highways England regarding the potential impact of further developments in the area on the safe and reliable operation of the M5 at Junction 12. In particular, there are specific issues that have been identified with regard to the potential for queueing on the off-slips, extending back to block the mainline carriageways. Significant works have recently been completed at the Cross Keys Roundabout to increase the capacity of the junction allowing traffic existing the motorway at j12 to flush through at a higher rate downstream. This has been designed expressly to mitigate the problem. Our experience at the junctions indicate that it has significantly addressed the problems concerned for now, albeit, queueing in the morning and evening peaks on the B4008 northbound approaching the junction from the south is becoming an increasing issue.

We are aware that Highways England and a number of other stakeholders are looking closely at this problem to understand its causes, and establish the basis for appropriate mitigations.

Stagecoach experiences traffic conditions here and on the wider network every hour and every day. All our buses are equipped with Automatic Vehicle Location and we monitor delays as a matter of operational procedure. We are of the clear view that such problems as exist at junction 12 and on the immediate network are complex and involve the interaction of trip demands expressed at both local and much longer-distance scale; and clearly also reflect freight demands associated with a number of distribution and logistics operations based in the immediate area.

Certain outbound demands from residential development in the area are expressed south towards major employment in Stroud District, not least the large concentration of jobs at Stroudwater Business park near j 13, but also beyond towards the Bristol Northern Fringe. This is unsurprising

given the differential in house prices between Quedgeley and Bristol; and the fact that the journey time to Aztec West from this area, certainly in free-flowing conditions, can be as little as 30-35 minutes. Many car-borne journeys from eastern parts of Bristol to Aztec West at peak times would take greatly longer than this.

With no rail station on the Gloucester-Bristol Line south of the City apart from the very limited facility at Cam, there has long been an aspiration to provide a new station in the area at or around Hunts Grove. This has featured in successive Local Plans since 2006. However it seems no closer to be achieved now than then. The site would presumably be at Naas Lane on the far eastern edge of existing developments. It would require additional train paths to be achieved for local “stopping” services between Bristol and Cheltenham, potentially extending beyond to Ashchurch and into Worcestershire. While we understand there is a requirement to invest in re-signalling the line, and there are clear aspirations on the part of many bodies to effect a half-hourly stopping service between Gloucester and Bristol, we are not aware of any firm plans to realise this in the next Network Rail Control Period to 2029 (CP7). Plans for CP8 are not published. However strategic objectives for this corridor include improving longer-distance train paths, and increasing capacity for inter-regional movements, and these are likely to significantly constrain what capacity could be made available for more local services.

However a significant asset exists in the form of the Waterwells Park and Ride site. This is a substantial facility including 520 parking spaces, and a small terminal building. It is quite far out from the city centre and it has proven to be difficult to intercept sufficient volumes of those with central area destinations to make this viable on a standalone basis. Stagecoach West operates a service commercially every 20 minutes that seeks to provide as fast a journey as possible while combining the service with demands from intermediate origins at Kingsway and at Hempstead. It is accurate to say that the facility offers significant unused capacity.

Stagecoach West has been looking for some time at how this facility could be leveraged to help sustain a new form of express service to Bristol Northern Fringe. In 2014 we trialled such a service known as the “Belles Express” that served the site. It was not sustainable for a number of reasons, one of which was insufficient frequency, and lack of awareness among key employers in the Northern Fringe. Since that time, however, demand has significantly evolved. This includes the completion of Kingsway and the acceleration of development at Hunts Grove from a significant hiatus, to a sustained high rate. We also have established a market leading presence with local bus services in the Bristol Northern Fringe in the last two years. This has included direct relationships with many of the area’s largest employers. Accordingly, we are looking carefully at the scope to establish a relevant service that could attract a significant proportion of current travellers who today only realistically can drive along the M5.

Secondly, we have separately made clear to the Councils and to promoters, that we see further separate potential to greatly improve the relevance of bus and coach for more local inter-urban movements between Quedgeley and Stonehouse in particular. There are significant exchanges of population in the area at peak times. Some of this is associated with school and college traffic. We already operate up to three buses per hour south from Quedgeley, two to Stonehouse and one to Cam and Dursley. It is likely that we will be diverting the 64 to serve the A38 south of the Cross Keys roundabout (replacing the existing 64 along the B4008 through Standish with another service)

serving Whitminster and the Chipmans Platt roundabout before continuing through Great Oldbury. This will provide new direct links from Quedgeley close to the major employers in the area. These movements today can only be made by car.

These services, and any improvements to them, would pass the eastern site frontage. There is therefore a clear potential opportunity to secure high quality bus facilities on the A38 Bristol Road (also assisting Hunts Grove) and potentially incorporating cycle parking and some enhanced scope for safe pick up and set down, perhaps with short stay waiting bays, to facilitate convenient “last mile” access to and from such services, supplementing the Park and Ride.

### **3. Public Transport Strategy**

The comments below elaborate upon our previous representations, including those made to the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy in 2015. They re-state the main relevant points, but also highlight more recent changes in circumstances.

The site is within immediate reach of existing service 12 at its north western edge which runs along Westland Road and Sellars Road. Existing pedestrian links past the Primary School site offer direct links to the service from the northern edge of the site. This is a core city service runs 7 days a week, and offers a frequent daytime service, supplemented with a half-hourly evening service until 2200 hours. It is nevertheless essential that the strategy to extend or otherwise amend this service fits into a wider strategy to improve bus frequencies, capacity, reliability and journey times that should cover the entire Central Severn Vale area, of which this is a part. While there is already some effective bus priority in the Quedgeley area, including around the Bristol Road junction with the A430/A38, there is scope to enhance this further, quite substantially. There is a substantial and worsening problem around the southern approaches to the City Centre around Southgate Street. This is clearly associated with car-borne movements associated with Gloucester Quays, and substantial residential and other development west of the Canal. It needs urgent attention.

The site is directly served by the 60 service (Gloucester-Whitminster-Cam/Dursley and the 64 Gloucester-Stonehouse-Stroud on its eastern edge along the A38 Bristol Road. Both routes can be expected to form, in some manner, a part of a very substantial service upgrade necessary to transform the attractiveness of the bus to meet longer-distance movement and support the sustainable delivery of the Local Plan Strategy. It would not be appropriate to divert these services into the site. However, as we state above, the greatest attention should be paid to the siting and nature of bus stop infrastructure on the Bristol Road, with a view to facilitating access to them from within the site and a rather broader hinterland, not just by walking, but by cycling and other modes.

It is also likely that a pair of enhanced stops on the A38 would also be used by any express service we initiated towards the Bristol area.

The spine road through the site does need to be engineered to accommodate a bus route between Sellars Road and the A38 Stagecoach West confirms that it intends to use this route for a frequent service in due course. It would be advantageous to ensure that it is delivered and available for a through service when more than 50 occupations take place more than 500m from stops provided that are used by the existing services 12/64.

It is worth making clear that it is our hope to initiate an extension of our service 8 beyond the Waterwells Park and Ride site to serve Hunts Grove, later this year. This will, initially, terminate at a temporary turning circle within the development. However, before long, it will be necessary to continue the route through to the A38 junction and beyond, as there is no specific provision to turn the bus within the site. The most efficient place to turn would be to pass the eastern part of the site using the A38 northbound off-slip, to then turn right and use the overbridge to return to Hunts Grove. This would provide a direct link from the initial likely phases to all parts of Waterwells, which extends a good distance away to the east of the A38, and well beyond comfortable walking distance.

The existing Local Plan Allocation “Land South of Haresfield Lane”, also known as the Hunts Grove extension, is likely to provide a loop road allowing a bus service to terminate within it. The additional 750 dwellings, plus evolution of wider demand, ought to support an increase in frequency on the Hunts Grove service to at least every 15 minutes. However, it may prove at least as advantageous to continue to operate the Hunts Grove service beyond the A38 access at the stage that this loop is available, to maximise the connectivity and potential hinterland available to the service, including the eastern end of Hardwicke Green.

#### **4. Urban Design**

Stagecoach confirms that it is already confident that the spine road indicatively shown on the material in support of the Consultation reflects a suitable and reasonably optimal bus routing, given the development context and the site constraints. It should be assumed that buses will route in both directions through the site, with bus stops provided on both sides of the spine road. It is likely that city-bound buses will route towards the west towards Sellars Road; however, this is far from certain. Bus stop sites should be therefore considered that could allow for appropriate installation of shelters on either side of the road.

It may prove advantageous to alter the alignment such that the route ties in to Church Lane a little further south if possible, to bring more plots west of that into convenient reach of stops.

We would urge that in terms of detailed design of the spine road, the fullest consideration is given to our comprehensive guidance document “Bus Services and New Residential Developments”. We would also recommend that treatment of frontages along this route is sympathetic to the regular passage of large vehicles, and higher levels of movement than most residential streets. We would also advise that it is quite possible peak capacity requirements will warrant the use of double deck vehicles in time. This being the case it is especially important that on-carriageway parking is minimised, that frontages are set back at least 6m from the kerblines, and ideally, that direct frontage access is limited to shared private drives only.

We refer above to the need to be especially careful to identify any opportunities to deliver a pair of enhanced bus/coach stops serving among other things, longer-distance inter-urban services, running along Bristol Road. These should provide the opportunity to draw from a wider hinterland within the site, and, indeed from Hunts Grove and the southern part of Quedgeley. Facilities to access these stops by cycle, including secure cycle parking, are likely to be highly relevant, along with the scope to safely stop, and wait to set down or pick up passengers by car or taxi. For this reason the site for these might profit greatly from being directly associated with a local centre, should it be considered appropriate to site this near the eastern part of the development.



Opportunities to maximise the attractiveness of walking and cycling within the site will support the highest levels of public transport use. We also would urge the greatest possible care to be taken to make walking and cycling attractive options to nearby an adjacent employment sites, to minimise the need to drive for local journeys, especially at peak times.

## **5. Delivery and deliverability**

We note that the site is in a single control of a national housebuilder of good repute. It is also clear that the site could make a contribution early in the Plan period. This is well evidenced by the recent completion of a development that formed part of the Estate at Sellars Bridge; and the recent application for a first phase, that shows that all technical disciplines have been addressed allowing an initial phase to come forward.

The developer assumes that about 120 dwellings per annum would be delivered from this site over a 10-year period. This aligns with the assumptions in the Council's own trajectory at Section 7.0 of the Draft Plan. It ought in our view, to advance completions to begin sooner than 2025-26; and equally we would urge that development progresses expeditiously once commenced, in order to avoid a situation where significant numbers of properties are occupied deep within the development for any period of time, before a bus route can be offered within convenient distance. In this connection we suggest that trigger should be set that no more than 50 dwellings shall be occupied lying more than 500m from existing or future bus stops on Bristol Road and Sellars Road/Westland Road, before the spine road is completed and made continuously available thereafter to bus services.

While we trust that the exceptional opportunities this site offers for proportionate contributions to pump-prime further bus service improvements will nevertheless be required. There would be a number of possible strategies and supporting mechanisms to effect this and we need to discuss the optimum solution to effect the best possible outcomes in line with the mobilisation of development at a suitably early stage, while also avoiding excessive costs being incurred prematurely, or inappropriately and unduly burdening the development. However, we can point to the success of the direct procurement approach by the developer at Great Oldbury, Stonehouse.

In particular, assessment of the appropriate scalable and phased delivery of new and improved services, which are likely to involve both improved links towards the north and contributions to catalyse improvements to southbound services, needs to be agreed.

## **G2 Whaddon: Public Transport Strategy Commentary**

Stagecoach confirms that in addition to the material submitted to the Council by the promoters as part of the evidence base to the Local Plan Review, we have had separate discussions over a considerable period with the promoter's client team, to help identify and shape proposals for the development, such that they maximise the opportunity for the use of sustainable transport of all kinds, not only existing or potential future bus services.

Stagecoach is concerned that the share taken for sustainable modes is maximised, not least to ensure that added pressure on transport networks from development-related car-borne traffic does not seriously aggravate current and foreseeable congestion on the highway network across a broad area, further eroding our ability to provide reliable attractive journey options within an acceptable journey time.

The JCS area, adjoining which the proposed allocation sits, already suffers from serious and deteriorating issues arising from demands on the highways network at peak times exceeding practical capacity. These problems are growing in intensity and extent. St Barnabas junction between Stroud Road and the A38 Eastern Avenue, is a known significant focus of such difficulties. It is therefore essential that movement into the City from the site is accommodated in such a way that these problems are mitigated, rather than aggravated.

### **1. Development scope**

The allocation is for 2500 dwellings and 5 Ha of employment.

The allocation covers three separate main controls, of which the promoters control the bulk, but not the holdings adjoining and further north between Grange Road (the current edge of the built-up-area) and their site. A portion of the site within Gloucester City has been successfully brought forward for 250 dwellings by Persimmon Homes. A larger holding further east within Stroud District under the control of a third party, has always been considered part of the area under consideration for allocation.

The promoter of the southern site consider the land under their own control has scope to appropriately accommodate about 2400 dwellings; a figure that suggest that with adjoining parcels a substantially larger quantum could in theory be accommodated.

The largest promoted site includes land for single combined primary and secondary school. This is relatively unusual but has been implemented on sites of similar size elsewhere in England, not least Chafford Hundred in Essex.

The transport capacity issues at St Barnabas will need very careful mitigation under any scenario. There is an argument that the costs of this mitigation might be most appropriately and viably borne by allocating land across multiple controls for a higher quantum, if a suitable mitigation package robustly able to accommodate the demands arising could be agreed.

The all-through school and the Secondary phase in particular would greatly improve trip internalisation. However given the presence of Grammar Schools and denominational education in the City, and also in Stroud, this should not be over-estimated. The proposed Local Centre could

count on a significant exclusive hinterland. This is likely to support a larger range of local convenience retail and service businesses than a smaller scheme, especially if it is optimally sited. This would further obviate the need to leave the site's immediate vicinity to meet day-to-day needs.

There has been a great deal of work done over many years to understand the opportunities and the constraints on the site and accordingly, the indicative master plan now reached a relatively mature stage.

This site lies adjacent to the existing commercial bus network. Importantly the site directly benefits from the current half-hourly interurban service 63 corridor along and near its eastern boundary, providing direct links into both Gloucester City Centre and Stroud. It is also relatively close to the terminus of city service 9, running up to every 15 minutes. This means that with great care, and a suitable bus stop and turning facility being provided just within the site off Stroud Road, initial phases to the east could be reasonably well served from first occupation. However, successive phases distant from the Stroud Road will require a strategy to be developed that will demand great care. The fact that the demise does not afford a long boundary with Stroud Road is likely to mean that maximising the potential attractiveness of pedestrian and other rights of way to reach service 63 is essential.

Service 9 is already a relatively long and intricate urban route. Extending it is likely to be unjustifiable, especially if intervening land in third party control is not brought forward and integrated with the scheme. As it is, even then, the width of the street between the current Tuffley terminus and Grange Road, across which a direct link should be provided with no change of priority, is of a width that its use as a bus route is marginal.

## **2. Proposed Railway Station**

There has been an aspiration for a station in this area for many years, and was initially associated with Hunts Grove, west of the railway that forms the site's western boundary. We note that land for this station is reserved.

The station would notionally provide for an immediate hinterland numbering a very substantial number of homes both east and west of the line, including the whole of south Gloucester. Given it would notionally be expected to offer services towards Bristol, that are not available at Stonehouse or at Stroud stations, in the absence of a further new stop at Stonehouse Bristol Road, the station would also be likely to attract journeys originating in both. The difficulty then, is that a great deal of traffic could easily be attracted to the station by car, demanding substantial parking facilities, as well as creating serious pressures at peak times on the rail bridges, which at both Grange Road and Naas Lane, are somewhat substandard.

The promoter has set out plans to potentially extend bus services into the site via Naas Lane from the west, which might be considered to address some of this demand. However, the feasibility of this needs to be looked at very carefully indeed. To be practical and effective, it may be that the rail crossings at Naas Lane and Grange Road need to be dedicated to sustainable modes only. We note and welcome that the southern access towards Naas Lane is proposed for sustainable modes only but this may not be sufficient, given likely rising levels of local traffic seeking this route. However, this

then is likely to set up wider impacts on the local network arising from the impact on local connectivity.

Thus far, despite the policy backing and strong local aspirations, providing any new station facilities here and elsewhere in England related to large scale development has proven exceptionally difficult, especially when a longer-distance main line is involved as is the case here. For the reasons above, and looking at the wider constraints that hinder the delivery of such facilities, we would urge that the case to bring this land forward places no reliance on the delivery of this station.

### **3. Transport Strategy**

Given the challenges known to exist at St Barnabas, outside the District, and to a lesser extent on the northern approaches to Stroud, it is essential that the development arrive at a means to firstly create some capacity headroom at St Barnabas, and then ensures that any capacity released is not overwhelmed by traffic arising from the development. Whatever happens, the peak hour bus journey times through St Barnabas need as far as possible to be the same as they are off-peak, if the necessary bus route capacity is to be provided, and the choice offered is also to prove sufficiently attractive to be chosen over car use. Maximising the bus mode share from the site, to exceed anything that has to date been achieved in the JCS area, much less within Stroud, is highly likely to be a necessary precondition to bringing the site forward sustainably.

We do have some grounds to believe that this would be achievable, albeit challenging.

The key to maximise the bus mode share from the site would be to greatly enhance service frequency to at least every 20 minutes between the site and both Stroud and Gloucester if phase 1 lies off Stroud Road. If not, at first occupation, a similar frequency somehow needs to be delivered from Naas Lane. As the site builds out, a least a 10-minute frequency will be needed, simply to deliver enough capacity to accommodate a sufficiently high mode share. The precise trigger for this would need some analysis and discussion but is likely to be needed before the 800<sup>th</sup> occupation.

The journey time by bus must be competitive with the car especially at peak.

If a direct bus link is to be provided via Naas Lane to Waterwells to the west – and we agree that the proximity of this and other employment in the near vicinity is a major component of the site’s sustainability credentials – then this tends to beg a closure of Naas Lane to anything other than sustainable modes. Otherwise, the combination of local traffic with that with longer distance destinations, seeking to use the M5, is likely to overwhelm the local network over a quite large area.

The A4173 Stroud Road represents a corridor along which simple provision of bus lanes simply cannot be achieved. Therefore if buses to the north are not be subject to even more serious queuing and delay than today, an alternative, traffic-free route needs to be found, both for the 63, the existing 9 and any new or enhanced variations of service needed to serve the site. In practical terms this is most likely to involve some kind of re-purposing of the parallel street, Campden Road/Firwood Drive already used as a bus route, such that at its northern end it is used for sustainable modes only, at least at the busiest times, through the use of modal filtering. Signals, and a short stretch of bus lane along Eastern Avenue eastbound to St. Barnabas, looks likely to be achievable. In the opposite direction, the potential to create a bus lane southbound approaching the junction needs to be explored with very great care. Without corridor-wide bus priority measures to and from the City

centre, that can realistically achieve a more consistent and rapid journey time than today, and secure both the background 15% mode shift that the JCS transport evidence base separately assumed as well as a very high bus mode share from the development, the sustainability of the allocation would be very questionable.

#### **4. Urban Design**

Most of the extensive site extends further than 400m to the west of the A4173, providing the current closest bus route. Contrary to the impression given in the promotional material this service (63) is **not** amenable to diversion deeply into the site, as it performs an inter-urban function. However, a suitable stop just within the site allowing the service to quickly run in and out, probably associated with a local Inter-modal Interchange (see below) is supportable and can and should be pursued.

The spine road between Naas Lane and the A4173 must accommodate a high-quality bus corridor, for an extended or new service, or both. We note and welcome that the current indicative master plan does so, and that our prior input has been taken into account by the client team.

It is essential that a second bus route link is provided to and through the northern edge of the site, to allow a direct bus route through adjoining land running parallel to and west of the Stroud Road as far as Grange Road. This should be provided to the same standards as the main spine road, and conditions need to be agreed to ensure that this is built and made available to the same point either side of the boundary with a mutual connection clause, and without any intervening land in third party control preventing adoption of a through route across the boundary in the fullness of time. For the avoidance of doubt, this is to future-proof the optimum evolution of the bus network, and the promotion of only the southern control does not in our view demand the delivery of all the land south of Grange Road, though we do think this is likely to confer some significant advantages.

**We would nevertheless urge that in due course, at detailed design of these streets, all stakeholders carefully consider the design principles set out in our formal guidance document “Bus Services and New Residential Developments”.**

We support the Inter-modal Interchange on Stroud Road, to improve the effective catchment of the Stroud Road service (including for journeys to Stroud). Should the site justify the provision of a second, smaller local centre, we would expect it to be oriented towards the A4173, and co-location of this with the Interchange would strongly support this acting as a significant focal point for inter-modality. In addition to secure cycle parking, we would urge that the scope is identified to provide some dedicated parking spaces for “stop and drop” activity, whether by taxi or others, and which would serve to help facilitate future “last mile” services in the fullness of time.

Stagecoach is expecting to work closely with the promoters’ client team to refine and optimise the urban design approach taken and secure the wider benefits this site is likely to offer to provide effective bus advantage in the A4173/Stroud Road corridor between Gloucester, Tuffley and Stroud.

#### **5. Delivery and Deliverability**

The main promoter, Taylor Wimpey, has a demonstrable track record of building urban extensions at pace and scale. They have acquired the whole interest of 1450 units consented at Innsworth within

the JCS area, and two reserved matters applications have already been tabled even before primary infrastructure works had commenced. At Great Western Park in Didcot, Oxfordshire, annualised rates of in excess of 400 dwellings per annum have been sustained.

Once commenced, we would say that achieving the most rapid rate of development possible will be essential to justifying the large outflows of cash needed to install the entire length of spine road, and bus route, at as early a stage as possible. It will also support a rapid evolution of demand that both justifies and helps support the earliest provision of bus service frequency and capacity.

As well as the need for rapid pace, we would stress that robust consideration of phasing will be of the essence having regard to the effectiveness and practicality of sustainable transport delivery. It is essential we do not see a repeat of the experience at Hunts Grove, where initial phases were brought forward as far distant from existing services as was possible to be, compounded by the successive delays over many years, in facilitating access into the site for buses. We see a definite risk in this regard, that site-specific policy must address.

The Council in its housing trajectory at section 7.0 of the plan at table 6 does not include the site as it is not formally allocated and is currently seen as being hypothecated to meeting Gloucester's needs. This need already exists. We believe that the promoter could mobilise rapidly following any allocation and outline consent being issued, and this is well demonstrated at both Innsworth and also at Perrybrook, another of the JCS Strategic Allocations at Brockworth. We see no reason why an annualised rate of delivery of up to about 250 homes/annum is anticipated. Thus the development could, assuming a start in 2023 be substantially complete by about 2034.

## **North West Cam: Public Transport Strategy Commentary**

Stagecoach confirms that in addition to the material submitted on the website by the promoters as part of the evidence base to the Local Plan Review, we have had separate discussions with the promoter and their client team, to help identify and shape proposals for the development, such that they maximise the opportunity for the use of sustainable transport of all kinds, not only existing or potential future bus services.

Stagecoach is concerned that the share taken for sustainable modes is maximised, not least to ensure that added pressure on transport networks from development-related car-borne traffic does not seriously aggravate current and foreseeable congestion on the highway network across a broad area, further eroding our ability to provide reliable attractive journey options within an acceptable journey time. As we make plain elsewhere in our previous and current representations the nature of the District, which exhibits low levels of self-containment and where settlements are relatively modest in size and separated by substantial distances, the focus on maximising the use of sustainable modes, and public transport in particular, needs to be at least as great as in a more urban context.

### **1. Development scope**

The allocation is for 650 dwellings and 5 Ha of employment. The promoters consider the site has scope to appropriately accommodate about 700 dwellings; a figure that accords with the capacity assumed by the Council in the previous “Emerging Strategy” consultation. At that stage the Council considered that a still higher quantum might be sustainably accommodated. Given the inherent sustainability credentials of the site, which is uniquely within immediate reach of a station with mainline rail service and is already served by bus services on its eastern margin, we would urge that the practical capacity of the site is made fullest use of. These credentials are well signposted by the site-specific template in the AECOM Sustainable Transport Strategy.

It is anticipated that a Primary School will be accommodated within the scheme, improving trip internalisation. A level of convenience retail would obviate the need to leave the site’s immediate vicinity to meet day-to-day needs, though we note the relative proximity of the convenience facilities available at the petrol filling station adjoining the allocation.

There has been a great deal of initial exploratory work done to understand the opportunities and the constraints on the site and accordingly, the indicative master plan has yet to evolve to something that is reasonably definitive.

As is made plain in the Sustainable Transport Strategy prepared by AECOM in support of the plan, this is a strategic node on the existing and potential bus network. The site both directly benefits from this, and will help to catalyse the delivery and longer-term sustainability of an unprecedented level of bus service that we expect we can make available on exactly these corridors, providing services to destinations to the north and south, as well as Cam and Dursley as the largest local centres of services and amenities. Cam is about 1.2 km from the centre of the site, and Dursley town centre is about another 2.5 km beyond that.

There is already a commitment to build a dedicated cycleway provision along the former Dursley branch railway formation as part of the existing Local Plan commitment now underway at North East

Cam. This is referred to in the Sustainable Transport Strategy. There are no grounds to believe that this could not be extended a very short distance across the A4135, to provide a direct dedicated active travel corridor from the site to Cam and Dursley.

## **2. Cam Railway Station**

This station is the only intermediate stop on the local service between Bristol, Yate and Gloucester, within the District, notwithstanding long-held aspirations to open new stops at Stonehouse and Hunts Grove. Itself it is a relatively recent introduction, having been opened in 1994. The original station complex closer to the A4135 and opposite the frontage of the allocation, is currently being redeveloped for housing.

The current facility is unmanned and has exceptionally limited facilities. Greatly increasing the level of use of the station and services, including improvements to both capacity and service frequency as set out in the Sustainable Transport Study, will require extended platforms, access for non-ambulant passengers, and a greatly increased scope for interchange as well as park and ride. The small car park at the existing site cannot be extended as adjoining land is now proposed for housing.

The current very limited bus service has to negotiate Box Road which has a seriously substandard junction with the A4135, increasingly congested with traffic, greatly aggravated by parked cars. We see these difficulties are likely to increase in the short term to the point that serving the existing site with bus services will become effectively impractical.

Thus, providing station facilities directly accessible from the A4135, and providing high quality interchange and passenger facilities represents a significant opportunity and necessary initiative. Extending the current platforms substantially southwards, and providing a new station complex facing north at the southern end of these extended platforms, incorporating disabled access, would allow for very convenient access to be achieved from both Wisloe Green and current housing commitments and proposals at North East and North West Cam. This would not be dependent on any additional stopping being introduced, nor additional train paths, in the short term. Obviously, the attractiveness and relevance of the rail service, and, indeed, the scope for any bus feeder service to become relevant, would be greatly increased should rail service frequency be uplifted to every 30 minutes.

## **3. Transport Strategy**

The key to maximise the bus mode share from the site would be to greatly enhance service frequency to at least every 30 minutes between the site and Stonehouse (thereafter potentially to Quedgeley/Gloucester), and towards Bristol via the A38, quite possibly serving Draycott and Cam first before using Tait's Hill.

A separate service to Dursley would also be likely to run at a similar frequency and scheduling overlay of common sections of service should aim as far as possible to create a core frequency of every 15 minutes between Cam, Draycott, Wilsloe and Stonehouse as the plan period runs on.

## **4. Urban Design**



Stagecoach notes that the AECOM Sustainable Transport Strategy site template for the proposed allocation PS24 includes a principle that *“The emerging road layout would provide for public transport permeability by ensuring the ‘loop road’ through the site is designed to accommodate a bus route should this be required.”* Parts of the site extend further than 400m to the west of the A4135, providing the current bus route. This clearly represents the only realistic corridor that would sustain a high-quality direct inter-urban service. Thus, such a loop would only be appropriate to accommodate a more local service, or, perhaps, dedicated school/college bus provision. We nevertheless support the routing flexibility that this loop would offer. We would urge that all stakeholders carefully consider the design principles set out in our formal guidance document *“Bus Services and New Residential Developments”*.

Taking Dursley Road and the A4135 as the likely future focus of public transport provision, the majority of homes ought to be well within 400m of stops, and virtually all within 600m. This corridor will also accommodate the strategic cycling provision in the area, which we anticipate will be extended along the A4135 on its north side towards Wisloe Green. The points where pedestrian cycling provision crosses the A4135 are likely to align quite closely with the main vehicular accesses to the site. The intersection of the A4135 with these side access links will offer natural “nodes” that would be highly likely to provide the best possible locations for bus stop provision, incorporating high quality shelters and cycle parking.

Should any local centre be provided, we would expect it to be oriented towards the A4135, and this could act as a significant focal point for inter-modality. In addition to secure cycle parking, we would urge that the scope is identified to provide some dedicated parking spaces for “stop and drop” activity, whether by taxi or others, and which would serve to help facilitate future “last mile” services in the fullness of time.

Stagecoach is expecting to work closely with the promoters’ client team to refine and optimise the urban design approach taken and secure the wider benefits this site is likely to offer to provide effective bus advantage in the wider A38-A4135 corridor between Quedgeley, Whitminster and Cam/Dursley.

## **5. Delivery and Deliverability**

It seems likely that this development could be brought forward quite swiftly, taking advantage of existing infrastructure. We see this potential is recognised by the Council in its housing trajectory at section 7.0 of the plan at table 6. This indicates that 50 homes would be occupied by 2025, suggesting commencements in 2024 over at least two outlets, and implying a swift start following consent shortly after the Plan is adopted. Thereafter an annualised rate of delivery of up to about 130 homes/annum is anticipated. Thus the development would be substantially complete by about 2036. Based on what is being achieved at West of Stonehouse and looking at recent performance on local outlets, this appears to be eminently achievable and if anything quite unambitious.

However, evolution of travel demand in the immediate area needs to be considered in conjunction with the existing commitments at North East Cam, which include as many as 730 units (see table below), a further 180 units proposed in this plan as an extension, and the proposed allocation at Wisloe Green for 1500 dwellings. North West Cam thus helps consolidate existing and future

demands on a single corridor along the A4135 which total potentially over 3000 new dwellings, and additional employment.

SDC Reference	Site	Number	Affordable %	Comments
S.13/0448/FUL	Land opp. 6 Box Road, Cam	71	30%	Taylor Wimpey complete
S.15/2180/OUT	"Millfields" Land North East Of Draycott, Cam	450	30%	Bathurst – Bovis on site with first phase
S.17/0964/OUT	Land off Box Road, Cam	36	100%	Aster Group awaiting reserved matters
S.18/0044/FUL	Coaley Junction Dursley Road	41	30%	Newland Homes, under construction
S.19/0810/REM	Land North West Of Box Road, Cam	90	30%	Wainhomes start imminent
S.18/2697/OUT	Land West of Station, Box Road, Cam	42	30%	HLM resolution to grant
	<b>TOTAL</b>	<b>730</b>	<b>33%</b>	<b>244 affordable units</b>

The combined rate of delivery across the additional sites added to current commitments being built out between now and 2025 is estimated conservatively at just under 300/annum. We see a great deal of evidence more broadly that this could be much faster, not least because direct access to rail service at Cam Station makes development here especially attractive to the market.

Proportionate contributions to pump-prime the bus service improvements will nevertheless be required. There would be a number of possible strategies and supporting mechanisms to effect this and we need to discuss the optimum solution to effect the best possible outcomes in line with the mobilisation of development at a suitably early stage, while also avoiding excessive costs being incurred prematurely. In particular, assessment of the appropriate scalable and phased delivery of new and improved services, which are likely to involve improved links towards the north first, needs to be agreed. Links to Stonehouse and Stroud are clearly required among other things to provide connections from those areas towards rail services to Bristol from the station from Stroud and Stonehouse, as well as links to the substantial existing and proposed employment west of Stonehouse.

## **PS19a North West of Stonehouse: Public Transport Strategy Commentary**

Stagecoach confirms that in addition to the material submitted by the promoters as part of the evidence base to the Local Plan Review, we have had separate discussions with the promoter and their client team, to help identify and shape proposals for the development, such that they maximise the opportunity for the use of sustainable transport of all kinds, not only existing or potential future bus services.

Stagecoach is concerned that the share taken for sustainable modes is maximised, not least to ensure that added pressure on transport networks from development-related car-borne traffic does not seriously aggravate current and foreseeable congestion on the highway network across a broad area, further eroding our ability to provide reliable attractive journey options within an acceptable journey time. As we make plain elsewhere in our previous and current representations the nature of the District, which exhibits low levels of self-containment and where settlements are relatively modest in size and separated by substantial distances, the focus on maximising the use of sustainable modes, and public transport in particular, needs to be at least as great as in a more urban context.

The initial comments made in the Sustainable Transport Strategy site briefing template by AECOM for proposed allocation PS19a North West Stonehouse concern the existing pattern of bus services. Stagecoach West would re-iterate that these are subject to a major commitment with Robert Hitchins Ltd. to divert and augment bus services as part of the now-consented West of Stonehouse development (known today as “Great Oldbury”), which lies to the immediate south, and to which the proposed allocation in essence forms a seamless extension. As part of these commitments we anticipate, in the quite foreseeable future, diverting service 64 through Great Oldbury and thence to Quedgeley via the A38 and Whitminster. This is picked up by AECOM subsequently in their Bus Strategy Diagram for the site.

There is a strong argument that the agreed strategy for Great Oldbury should be properly read as representing the baseline provision for the site, as this might well have been implemented by the time that the Local Plan Review reaches Examination in Public. Stagecoach understands that the developer is on the point of letting the contract to build the missing link in the Spine Road. Thus, the nearest bus stops serving the site will be within the Great Oldbury site. Stops are already built opposite tranche R21 and are planned at the Local Centre, at the point the spine road is completed. It is important that the AECOM work is not mis-interpreted to substantially under-represent the baseline for accessibility by bus from the proposed allocation.

The AECOM work recognises the clear synergies between the proposals and the consented strategic development, with regards to services and other amenities. We strongly agree with this analysis. The consolidated hinterland of demand for these services would certainly apply to the bus service provision.

### **1. Development scope**

The allocation is for 500 dwellings and 5 Ha of employment, that represent an extension of the consented Great Oldbury development. As detailed design of the adjacent parcels (H15-H20 inclusive as referred to on the Indicative Master Plan) and the northern loop of the spine road have

yet to be finalised, there is very good reason to believe that the promoter will be in a position to optimise the disposition of land uses, infrastructure and urban design to maximise the achievable synergies across the boundary and treat the extension seamlessly in urban design terms. We would strongly recommend that these opportunities are taken.

The consented Great Oldbury development includes up to 1350 homes, a local centre and primary school. The latter is now under construction. It is important to note that the development is delivering a policy-compliant affordable housing quantum. The proposed allocation will be able to take direct advantage of these facilities, as well as existing and proposed new employment. We strongly concur that the immediate proximity of the Stroudwater Business Park as well as the further employment to be provided on the Great Oldbury site, and significant further existing and proposed employment along the A419 well within 4km (and thus cycling distance) strongly support the sustainability of this location.

The promoters consider the site has scope to appropriately accommodate a significantly larger quantum of about **600 dwellings**; a figure that accords with the capacity assumed by the Council in the previous “Emerging Strategy” consultation, and the Sustainable Transport Strategy document prepared by AECOM. Given the inherent sustainability credentials of the site, which is particularly well located with respect to the largest employment and service centres within the District, within reach of a station with mainline rail service without recourse to a car, and is already served by bus services on its southern margin, we would urge that the practical capacity of the site is made fullest use of. These credentials are well signposted by the site-specific template in the AECOM Sustainable Transport Strategy.

As discussed above, trip internalisation should be assessed in the round with the existing consent of Great Oldbury, to which this represents a logical extension. A 2-form entry Primary School is under construction to the south west. Extension of Great Oldbury on to the proposed allocation would serve to underpin the exclusive hinterland of the proposed local centre substantially, further reinforcing a range of retail and other services that would obviate the need to leave the site’s immediate vicinity to meet day-to-day needs – a point clearly raised by AECOM in their site briefing template within the Sustainable Transport Strategy.

There has been significant initial exploratory work done to understand the opportunities and the constraints on the site and accordingly, the indicative master plan has yet to evolve to something that is reasonably definitive.

## **2. Stonehouse (Bristol Road) Railway Station**

This station is a one of several long-held aspirations to open new stops on the Bristol to Birmingham Main Line within Gloucestershire. The County Council has recently commissioned a Rail investment Strategy Study that examines this as well as a substantial number of other possible rail-based interventions in the County. While stations at Stonehouse and Hunts Grove have featured as initiatives protected within planning policy for some years, there is no sponsorship of either apparent from the rail industry or Network Rail at this time, of which we are aware.

In some ways this is incongruous given the size of Stonehouse and Stroud as settlements, and the fact such a station, if suitably sited South of Stonehouse near the A419, could effectively perform a “Parkway” function for a substantially bigger catchment south of Gloucester.

However, we would urge that the focus remains on what is demonstrably deliverable by the Plan, with active participants in the plan-making process. For this reason, we consider that maximising the potential for inter-urban bus and coach links, supported by targeted investment in inter-modal hubs, is much the most appropriate manner for the plan to progress, alongside exploratory work to substantiate the technical deliverability and business case for a station.

### **3. Transport Strategy**

The key to maximise the bus mode share from the site would be to build on the committed service provision at Great Oldbury, to enhance service frequency to at least every 20 minutes between the site and Stonehouse/Stroud and equally towards Quedgeley/Gloucester. Should further development come forward for housing and employment use west of the M5 near Whitminster on any strategic scale, there is a further potential - subject to urban design maximising the efficiency of a seamless bus advantage corridor - to considering if a further frequency enhancement to every 15 minutes might be achievable in the longer term.,

The attractiveness of a new express service towards Bristol via the A38, depends on its speed. Many motorists seeking destinations to the south from Cam and Dursley actually use junction 13, which while a significantly greater distance, is in fact generally somewhat quicker. It is possible that a service design to link Dursley and Cam with Bristol might serve j 13.

We have been in discussions with development promoters on both sides of j 13 with respect to facilitating access to longer-distance coach services, both by car and other modes. Regular coach services already use the M5 and if a facility is readily accessible to and from the motorway without significant journey time penalty, the size of the hinterland might well justify

A separate service to Dursley would also be likely to run at a similar frequency and scheduling overlay of common sections of service should aim as far as possible to create a core frequency of every 15 minutes between Cam, Draycott, Wilsloe and Stonehouse as the plan period runs on.

### **4. Urban Design**

Stagecoach notes that the AECOM Sustainable Transport Strategy site template for the proposed allocation PS19a includes a principle that *“The emerging road layout would provide for public transport permeability by ensuring the ‘loop road’ through the site is designed to accommodate a bus route should this be required.”* Parts of the site are likely to extend further than 400m to the north of the spine road intended to act as a bus possible route within parcels H15-20 inclusive of Great Oldbury. However, these would represent a small minority of plots. The extra circuitry involved in further extending the Great Oldbury loop directly onto the site between two quite closely spaced access points is in our view unlikely to be warranted, given that the vast majority of residents are likely to be well within a 400m walk of stops that could be provided within Great Oldbury. Creating a short bus route diversion to the north of the committed link through Great Oldbury would actually be achievable without abandoning any of the stops that are to be provided on the main spine road.

We nevertheless support the routing flexibility that this loop would offer. We would urge that all stakeholders carefully consider the design principles set out in our formal guidance document “*Bus Services and New Residential Developments*”.

The effective integration of the extension into the existing consented development to the south is highly relevant to maximising the use of sustainable modes and minimising the need to travel to take advantage of key local services and facilities, especially those provided within the consented development. The recent application (S.19/2165/DISCON) to discharge a condition on the outline consent for an Area Master Plan for parcels H16-20 inclusive, adjoining the proposed allocation, is thus highly pertinent. This demonstrates that the applicant and promoter has already taken intentional steps to optimise connectivity and circulation across the boundary between the consented and proposed development. Within the supporting Master Plan Statement, the following paragraphs are especially pertinent:

*“4.7 The Main Street east-west identified on the approved plan overleaf forms part of the Main Street ‘loop’ serving the surrounding residential parcels and Local Centre, **providing the key bus route** and primary vehicular access to the development. This is also the main access from Oldends Farm in the East.*

*4.8 As part of the evolution of LC1, LC2 and PS1 what was formerly the secondary link (East of LC1, PS1 and H17) has been improved (by the Area Master Plan proposals) to a ‘Primary Street’ providing cycle and bus routes to the Primary School and Local Centre. **The upgrade has therefore continued north through Parcels H16-18 and up to the northern boundary assisting with the prospective development of the adjoining PS19a by continuing the ‘Main Street’ road hierarchy.**” (our emphasis)*

Stagecoach is happy to endorse the approach taken, which provides a relatively effective and efficient link into the site. It also allows any route extension or diversion through H15-20, or further into the proposed site itself, to effectively serve the Great Oldbury Local Centre and the key stops that will allow a walk through to the adjacent employment parcels which will be important to passengers originating off-site, looking to access the employment area. As an aside, it is worth pointing out the mixed use nature of this and the wider area, generating simultaneous in-bound and out-bound trips, substantially assists with the overall economic viability of any bus services in this area.

Stagecoach is expecting to work closely with the promoters’ client team to refine and optimise the urban design approach taken and secure the wider benefits this site is likely to offer to provide effective bus advantage in the wider A38-A419 corridor between Quedgeley, Whitminster and Stonehouse, and then beyond towards Stroud and/or Cam/Dursley.

## **5. Delivery and Deliverability**

It is evident that this development could be brought forward propitiously, taking advantage of existing infrastructure. We see this potential is recognised by the Council in its housing trajectory at section 7.0 of the plan at table 6. This indicates that 100 homes would be occupied by 2025, suggesting commencements in 2024 over at least two outlets, and implying a swift start following consent shortly after the Plan is adopted. Thereafter an annualised rate of delivery of up to about 75

homes/annum is anticipated. Thus the development would be substantially complete by about 2036. Based on what is being achieved at West of Stonehouse and looking at recent performance on local outlets, this appears to be eminently achievable and, indeed, sedate to the point of being inappropriate. Maintaining a strong rate of development is important to allowing demand to evolve at a sufficiently fast rate to help sustain the commercial viability of the new and enhanced bus services that we expect to be able to provide to this locality.

However, evolution of travel demand in the immediate area needs to be considered in conjunction not only with the existing commitments at West of Stonehouse (Great Oldbury) but potential development west of the M5, which has been advanced as a suitable location for development by the same promoter. Land South of Grove Lane could include as many as 800 units, while a larger area to the north, lying east of the A38, could accommodate a substantial further quantum, of at least another 1300 units. Land south of Grove Lane is also being promoted to provide about 15 Ha of employment land, which might in any event be required of the proposed new stadium for Forest Green Rovers FC is permitted in due course on land currently being considered for employment east of the M5. There is an exceptionally strong potential relationship between development either side of the M5 which would “load up” a very high quality public transport corridor, that could, with thoughtful design, approximate to a “bus rapid transit” offer between Stonehouse and Gloucester. We urge the Councils to consider this very carefully, not least as a manifestly more sustainable option to accommodate the quantum currently being directed to the exceptionally remote location at Sharpness/Newtown.

Proportionate contributions to pump-prime further bus service improvements will nevertheless be required. There would be a number of possible strategies and supporting mechanisms to effect this and we need to discuss the optimum solution to effect the best possible outcomes in line with the mobilisation of development at a suitably early stage, while also avoiding excessive costs being incurred prematurely. However, we can point to the success of the direct procurement approach by the developer at Great Oldbury.

In particular, assessment of the appropriate scalable and phased delivery of new and improved services, which are likely to involve improved links towards the north first, needs to be agreed. Improved frequency to Stonehouse and Stroud, and to Gloucester are clearly required in the first phase.

## **Sharpness Vale Garden Community: Transport Strategy Commentary**

Stagecoach notes that a significant amount of information has been presented publicly by the promoters in recent months, that elaborates upon or supercedes that which has been previously supplied. This is very helpful.

The information submitted within the latest development prospectus is spread across the document in a number of places. There is a specific section on movement and accessibility, which is entirely appropriate given the remoteness of the site and the current near total dearth of realistic choices other than car use from the proposed site and the wider vicinity, and our own duly-made commentary as the largest commercial provider of passenger transport in the county and the immediate area, on where we see the opportunities to take advantage of existing or potential new bus/coach services.

We have previously made plain to the Local Planning Authority the reasons why we are extremely sceptical that any relevant, effective and sustainable public transport offer can be identified and delivered, that serves the Sharpness Vale site. This being the case, we consider that large-scale development at this site cannot be other than almost entirely car-dependent, and that the traffic impacts of the development will have a serious and wide-ranging series of deleterious impacts on the operation of the local and national highway networks, with attendant aggravation of already serious congestion related delays and unreliability on bus networks, operated by ourselves and other bus companies, both locally and miles beyond the proposals.

Following disclosure of further material by the promoters, we elaborate on this logic to assist all stakeholders in the development plan-making process, in assessing and arriving at an appropriate development strategy having regard to all reasonable alternatives, and based on a relevant and proportionate evidence base, as the National Planning Policy Framework requires.

### **1. Development scope and scenarios**

While the site is considered at this time to have a nominal capacity of over 5000 homes, the promoter accepts that it can realistically accommodate **2400 dwellings by 2041**. This no doubt reflects estimates on the point at which development could commence, as well as a putative rate of build and market absorption. There is little clarity on the date of first occupation but assuming annualised build rates of up to about 200/annum, this suggests that the site is expected to offer first occupation about 2028, assuming a few years of suppressed deliver to account for infrastructure provision and site mobilisation over one or more development fronts.

2400 dwellings would support a population of between about 5300 and 6000 people, adding to a modest existing population in Sharpness and Berkeley of about 4500 people, the vast majority in Berkeley itself. Optimistically then, the promotion would give rise to a combined potential hinterland of about 11,000 for any public transport service, though given that Berkeley lies somewhat distant from either a proposed rail halt at Sharpness Vale, and requires a diversion off any bus or coach route from the promotion towards Bristol, exactly how far it can be assumed the combined population would make use of any service offer would be complex to model. This population compares with Cam which with committed development is likely to account for about 10,500 by 2021 and neighbouring Dursley with about 7,500.



Demand for trips to and from the site will thus evolve over this 14-15 year period, and if allocated, presumably beyond. The economics of any passenger or public transport solution – rail or road based – depend entirely on sufficient volumes of demand being realised. In common with all strategic sites, and even more so with entirely new, relatively remote settlements, the **long build up to relatively modest levels of foreseeable demand arising by the end of the plan period creates an immense and unavoidable challenge on the revenue side** of the economic viability equation. As we have pointed out previously, demand from the site will be split, in a number of directions. This is corroborated and reflected by the indicative trip generation and assignment figures supplied by the promoter at section 8 of the prospectus. Demand to any given destination will thus be further damped.

The promoter apparently intends to address this (at least towards Bristol) by supplying a bespoke, contract coach solution (see below), rather than a public transport offer. Presumably, additional peak coach journeys will be added with demand as it is realised. However, this presumes that the solution will be relevant, and that each coach will be commercially sustainable at some point within a relatively short period of time, dependent almost entirely on the demand realised from within the scheme. We discuss the conditions which would need to be fulfilled for these conditions to be met later in this response.

The development is proposing to deliver 2 new Primary Schools – but **no new Secondary School**. We recognise that typically an exclusive hinterland of about 4500-5000 dwellings is typically necessary to justify secondary provision on a sufficient scale to be efficient and effectively provide a broad and balanced curriculum. Nothing is said about where the secondary pupil product of the development will be accommodated. Berkeley UTC is available in the near locality, but it is limited in scale, is only providing place from 14-19, and is some considerable distance from the site: indeed, from many parts of the promotion around Wanswell, it is over 3 miles from proposed housing by the most direct route, which is far from appropriate for walking. Nothing is said about if and how additional capacity would be provided to meet 11-14 needs, or an expanded KS4 and post-16 offer on the site which is very constrained. Accordingly we see no evidence that the site will not give rise to a very substantial requirement for statutory home-to-school transport, demanding dedicated school bus provision off-site. In reality, parental choice involving pupils being driven to various secondary education settings in the wider vicinity as part of journeys to work, make it more likely that car use will prevail for a very substantial proportion of home-to-school journeys.

Section 8 provides a very helpful initial estimate of trip generation at peak times for the site, and the nominal assignment of destinations for these journeys. These are, of course, based largely on 2011 Census journey-to-work data, and have no regard to school and other educational movements, for example.

This is assessed as being about 2000+ off-site peak hour trips in the morning peak, of the 4700 or so total generated, which suggests a very high degree of internalisation indeed: well under 50%. This is a remarkably low figure. In particular during early phases of the development it is inconceivable that either employment or a wide range of facilities will be available on the development, or within immediate reach by walking or cycling. Indeed those available at the former Berkeley power station complex, are well outside of a comfortable walking distance, and there is no attractive or appropriate dedicated cycle provision. This contrasts starkly with virtually all the other proposed

strategic allocations identifiable in the current Local Plan Review consultation, and several of the most credible omission sites, for example east of Whitminster.

Stagecoach continues therefore, to be extremely perplexed by statements within the initial transport evidence base that indicate that the site is “well-connected” to facilities and services. **We see no objective evidence presented by any party that justifies this conclusion.**

## **2. The Sharpness Branch Railway**

The presence of the single track freight railway, the remaining portion of a link constructed essentially as a mineral freight line to the Forest of Dean over the River Severn, has been a consistent feature of the promotional narrative justifying this site. It has until now been touted as the principal basis for a high quality public transport link serving the site. In fact, without the presence of this historic and near-derelict asset, it is arguable that there would be any remotely-credible logic for identifying this site for growth on any major scale.

This line once connected the Bristol-Birmingham Main Line to Lydney via a bridge over the Severn, a structure that was severely damaged in an accident in 1960, and which, following a second incident within a very short time, was demolished. The line featured a chord towards the south at which has long since been lifted, and the trackbed sold off and largely reincorporated into adjoining fields. It has been built over entirely adjoining the A38, making reinstatement of this link practically impossible. This leaves an orphaned single track branch with only a northwards connection to the Bristol-Birmingham main line south of Draycott. It is this that the promoters have alluded to reopening for passenger rail use.

The material submitted in support of the promotion is, perhaps understandably, highly elusive about the actual commitment to deliver any rail link to the site within the plan period, despite the strong statements historically advanced. In the latest Prospectus, a “Railway halt” is mentioned for full 5000 unit scheme in box 4.4, but there is no commitment to deliver it within plan period scheme (box 4.5) by 2041.

This is a substantial evolution of the vision for the site, which initially was advanced including a direct link to Yate and Bristol. More recently this has been substantially wound back with statements made at the time of the previous “Emerging Strategy” Reg 18 consultation about tram-trains. However at p.16 under the “car freedom” chapter heading, a highly tendentious statement is made, flying in the face of the explicit proposals earlier in the document, that “there’s likely to be a twice hourly (rail) shuttle service from Sharpness to Cam and Dursley with connecting service to Gloucester and Bristol Parkway”. There is actually neither commitment nor any basis for certainty that this will be achieved at all, much less within the plan period.

The desperation of the promoters to convince stakeholders that the rail connection is a reasonable certainty is conveyed once again at Paragraph 8.17 which indicates the “likely re-opening of the Sharpness railway line to passenger trains, with a new service to Cam *and Gloucester*” (our emphasis). This seems to imply a through service to Gloucester, which would demand the service on the branch line joining the main line, and occupying train paths that otherwise would be available for improvements to much longer-distance services, not least a much-sought improvement in the

frequency of the local rail service between Bristol and Gloucester/Cheltenham and potentially Ashchurch, to two trains per hour.

The actual intentions of the promoter, and the real level of commitment from Network Rail and GCC as a potential project sponsor, actually remain far from clear. The level of support from Network Rail is alluded to, but in the absence of any clear public commitment from those parties that are competent to deliver it, as part of a wider recast and upgrade of infrastructure and train services on the rail route, the greatest level of doubt has to be raised.

The most recent evidence comes from the local press in which the chairman of the Vale of Berkeley Railway Trust, a group of enthusiasts with separate ambitions to re-open the branch as a heritage attraction, have agreed to a joint approach to Network Rail. He is quoted by the South Gloucestershire Gazette on 2<sup>nd</sup> January 2020 as saying *“We have agreed a joint paper with the developers that we will be presenting jointly to Network Rail in the new year (2020)”*. This is evidence that, far from having secured any agreement in principle that Network Rail is happy to investigate (much less progress) any proposals to re-open the line, the project is still very much being driven by the promotional consortium.

This contrasts starkly with the unequivocal, clear and publicly made comments Stagecoach has offered to date to the Local Plan Review process, as to where it sees the greatest opportunities exist for development to take advantage and help catalyse substantial improvements to existing key bus corridors, and, more importantly, the more strategic opportunities that exist to catalyse a step-change in public transport frequency and connectivity using the A38. These opportunities are not merely a response to a single strategic development option, but offer an holistic approach to much more sustainably serve the entire district’s travel demands, both current and future, should the development strategy seek to focus strategic development on this corridor, and in the other locations already identified for growth in the preferred option at Draycott and West of Stonehouse.

We have already made clear as one of the UK’s largest public transport operators, and the largest operator of bus and coach services; that we see no commercial case to provide a relevant bus or coach-based public transport service from Sharpness, on the basis of the proposals advanced by the promoters.

Our core business has involved comprehensive experience of operating the passenger railway over several decades, too. Given that the viability of a rail-based option would require a volume of use an order of magnitude, or more, higher to justify a credible rail-based business case, we see no grounds to believe that a rail based option would be deliverable. The fact that promoter makes no attempt at this stage to commit to achieving this within the plan period, despite the wider narrative, effectively confirms that they themselves have no such confidence, entirely contrary to the impression made by many of their statements, which would appear to wish to lead stakeholders to conclude otherwise.

Stagecoach, along with the Local Planning Authority, is aware that Gloucestershire County Council last year prepared a County Rail Investment Strategy. This is understood to be complete, but is not yet in the public domain. This strategically examines a full range of potential options to improve rail service timetables and capacity, having regard to their technical achievability, a range of very complex trade-offs on the local and wider rail network, and the likely business case for each project, to inform County support, including bids for external funding. We are clearly of the expectation that

this study will confirm quite clearly, that, whatever the relatively modest business merits of reopening the line for any level of passenger service, this would not be justifiable given the fact this would essentially preclude the potential for additional train paths on the Main Line between Bristol, Gloucester and beyond for both local and express services.

Irrespective, without this project being independently, actively and publicly supported by Network Rail, with a commitment to working proposals up for delivery within an identified period, likely to require explicit GCC support as a key partner, it is entirely inappropriate to put any reliance on reinstatement of passenger rail service being realisable.

The evidence and promotional material supplied by the developer consortium, thus very strongly points the Council towards assessing this promotion on the basis of a roads-based access solution only.

### **3. Overall transport and movement strategy**

Any transport strategy for this site is unavoidably presented with exceptional challenges, that are not shared with a range of other potential sites (both draft allocation and omission sites) adjoining or much closer to either existing locations of employment and services; or on existing or potential high quality public transport corridors linking those sites to multiple destinations with credible employment, education, retail and leisure options.

This is because, in the context of Stroud District, the site is as distant from both local and regional key centres of services and employment as it is possible to get. Far from offering “proximity”, as the Prospectus somewhat bizarrely claims, the “uniqueness of this location” (paragraph 8.16) arises principally from its relative remoteness from any larger centres of population, offering key services, employment, and demanding significant levels of external connectivity over extended distances. Gloucester city centre is 30km away via the most direct route. Stonehouse is about 17km away; the nearest significant existing local employment area and one that is likely to see further planned expansion. Aztec West is nearly 25 km distant; other northern fringe destinations further still.

The strongest possible evidence that the site is geographically remote from significant centres of population and economic activity arises, of course, from the presence of the former Magnox nuclear power station at just a mile west of Newtown. Safety considerations led these to be sited as far as they realistically could be from potential receptors in the event of an accident.

In fact, the actual transport and movement strategy, by focusing on Bristol and its northern Fringe and Gloucester as destinations, demonstrates all but explicitly how far the promotion maximises the need to travel off-site, and also maximises the distance that such journeys need to be, compared with almost any other strategic development option. It is exactly these kinds of contexts, with extended distances, a multiplicity of potential destinations, and lack of credible combinations of en-route demand (without abstracting from existing services nearer destinations) where public transport is most challenged in offering a **relevant** choice, and thus one that credibly will be used by large numbers of residents. Service frequencies and flexibility are unavoidably low, and journey times extended compared with car use.

Only by combining a wide range of existing and new demands over a single, direct corridor anchored by substantial trip attractors both en-route and at both ends, can a public transport service overcome these factors.

We welcome the acceptance by the promoter that the wider highway network cannot be expected to accommodate additional demands arising from development at this location, alluded to at paragraph 8.3 and elsewhere. We also applaud, in principle, the premise that transport investments should be put first into sustainable modes, rather than attempting to increase overall capacity for general traffic to accommodate demand. However this does not vitiate the fundamentally unsustainable nature of the location, greatly extending journey distances and times, and making practically impossible to consolidate demands onto an existing or potential public transport corridor, such that an attractive and relevant service can be offered and sustained in the long term.

Given the promoter's recognition that at peak the "whole network is under stress" section 8.3, it is logical and indeed a radical position that paragraph 8.17 (bullet 3) states that at peak periods, "we **need everyone** to adopt non car-based travel as that is when the network is most stressed"(our emphasis).

Such a goal, while worthy, has yet to be achieved anywhere in the UK. There is a statement that the Strategy "need(s) to actively discourage car use" (paragraph 8.14). However, despite the "need" to do so this strategy falls a very long way short of any commitment on the promoter's part to achieving this objective. Rather, the prospectus promises that "We won't limit car use for those who really want to use this mode." This evidently does not follow through. Thus there is no clear intention to restrict or reduce the convenience of car-borne mobility, except to not provide any more traffic capacity.

The secular moves to lesser car ownership referred to in the prospectus and used to justify the overarching strategy and its achievability are crude and, in fact spurious in the context of the area and the District. The contentions, while broadly true, are far from universal; they apply principally to younger demographics (without children) in large metropolitan areas. Fewer car trips are indeed being made but the same National Travel Survey data from which these assertions are drawn, makes clear that the overall mileage driven by cars is continuing to rise; reflecting much longer average trip length. This is driven precisely by extending commutes from localities that are increasingly distant from core labour markets: exactly the situation the proposals would seriously aggravate.

In relying only on existing local and wider junction and highway capacity, the strategy in fact set up any road based passenger transport solution to fail. The potentially very serious queuing issues that result will no doubt be encountered off-site, once traffic generated by the development reaches the junction of the B4066 with the A38 and, thereafter, on the approaches to the SRN. These are exactly the routes any PT solution from the site will need to use, as well as other services needed to support plan-led growth elsewhere in the District and in South Gloucestershire. If the last 40 years teaches us anything it is that in any given corridor outside major urban areas, congestion encourages a higher level of car use, not mode shift to public transport. Faced with an unreliable and extended public transport journey, trapped in the same congestion, most prospective travellers feel they are in greater control of time of departure if not arrival by driving, and are presented with a range of strategies to mitigate both usual and unpredictable delays, including reassignment of route, and

choosing an earlier or later time of departure – the driver of peak spreading. The car also offers a tailored end-to-end journey, further advantaging the driver when compared with the additional generalised journey time penalties involved in reaching the stop and walking at the end destination.

It is essential the sustainable transport offer is deliverable, relevant and effective, and achieving this is at the heart of establishing an offer that can be sustained as the basis for a longer term improvement in public transport into the future.

Despite the continuing references to a rail service towards Cam (for Bristol) and Gloucester, the development within the Plan Period to 2041 apparently relies entirely on bespoke coach services from a single stop/terminus at the mixed-use core. Notably, these services are apparently not intended to further penetrate the development area. (Overall Concept Plan p.11). This sets up the need for some substantial “last mile” trips within the development from homes on the periphery.

These bespoke coach services are intended to offer direct services to a range of destinations, but overwhelmingly the requirements are seen to be towards Bristol.

The graphic sets out the coach capacity (in number of vehicles) nominally required to each destination on the basis of a commitment to provide a seat for all forecast demand (irrespective of if it's taken up) at section 8.3. This is assessed as being about 2000+ off-site peak hour trips, of the 4700 or so total generated, which suggests a very high degree of internalisation indeed. In early phases of the development it is inconceivable that employment and a wide range of facilities will be available within immediate reach by walking or cycling.

This strategy is predicated upon the need to demonstrate that there is no requirement to drive from the site at all at peak times, thereby obviating the need to provide for any additional highway network capacity. This is exceptionally risky. Without achieving 100% passenger transport mode share for off-site peak journeys, significant additional demands implicitly are expected to arise off-site on the wider highways network, which is already under great strain, not just in the site's vicinity, but at least as problematic, nearer destinations such as at M5 junctions 12, 15 and 16.

We additionally dispute that the existing attribution of local travel demands from 2011 census can be crudely used to closely forecast those destinations sought by future residents (paragraph 8.4). This would be a wholly different demographic whose choice to live in this area would not well approximate to a relatively small and very stable legacy population. The relevance of the strategy focused only on a single group of destinations in and around the Bristol Northern Fringe rapidly declines if expected travel demands are more diffusely spread in space and time than they anticipate. The trip assignment model is just that.

The Phase 1 Public Transport offer is clearly focused only on bespoke peak-only tidal express coaches to Bristol. The “Zeelo model” is explicitly mentioned. Presumably this is the “smart buses” solution available at the outset (p.16 ‘car freedom’) which, in essence, is a “point to point” solution: *“quite a few of these (coaches) will be dedicated to taking people to a particular business park or common employment destination”* (para 8.9). There is no attempt to consolidate a range of demands in a single logical identifiable public transport corridor. There is therefore no synergy over space or time achievable, to generate the kinds of volumes necessary to develop and sustain a suitably frequent and relevant service pattern.

Very importantly, such synergies, especially in the context of Stroud District, would greatly serve to help achieve a substantial shift of existing car-borne traffic towards bus and coach services, helping to reduce carbon and pollution, greatly assist in socio-economic inclusion, as well as damp pressure on the network. On the contrary, the proposed model would have no positive impact on travel options within the wider locality or District, even if, by some extraordinary series of circumstances, they did in fact serve to accommodate the entirety of the trip demands from the site in the peak hour.

Section 8 also exposes some significant questions about even this operating model. For example, there is a substantial imbalance between peak outbound and inbound peak volumes. This asymmetry is of course, quite expected and reflects a number of factors affecting the timing of return journeys. To Bristol, the graphic presents a very large difference between 16 coaches capacity in the morning (or will it be, given the comments in the text?) and the 6 coaches return peak capacity. This is not merely a matter of capacity requirement. It implies business destinations that have a service provided in the morning will not offer sufficient return demand on a single departure, to justify the service being provided. This is precisely why a regular, scheduled public transport route, if it can be supported commercially by sufficient demands, ultimately represents the most economic service to provide and the most attractive and relevant one to the public, as there is no need to commit to a specific departure time. The greater the frequency, the more this can begin to compete with personal car use.

This kind of regular service, meeting a wide variety of off-site trip demands and purposes, is not what the promoters envisage at all. Rather, Zeelo is explicitly mentioned among the “likely” components of the strategy at 8.17. This is a bespoke peak-only contract management model, running and selling seats on charter coaches to a single destination, and selling typically through an app promoted by employers at the destination, which at least provides a single time and point of arrival. Data from employers gives the needed transparency on where clusters of origins exist among a large employee base sufficient to lay on a coach.

It is a new model, and a relatively newly-established business, that concentrates on quality and convenience of payment, with a strong customer service architecture, in effect aiming to replicate many of the features of Uber. To date most of the activity of the company has been focused on providing corporate shuttle coaches under contract to very large employers, where the revenue risk is either borne by the employer or, to a great extent, shared. The company was founded and until recently largely funded by the innovation arm of Jaguar Land Rover, which has been its first and largest established client, and which has a number of very large concentrations of employment that are very remote from any significant public transport offer. Zeelo is, however, unavoidably exposed to the very high fixed costs of coach charter which are still further elevated by the fact that operating assets are so poorly utilised. Most coach operators size their fleets to long-term predictable demands arising from school and college contracts. By contrast, Zeelo’s business model benefits from exceptionally low entry and exit costs, at least in its infancy, when small numbers of vehicles are required.

It must be stressed that Zeelo does not offer a scheduled bus service registered as a stage carriage service with the Traffic Commissioner under the 1985 Transport Act; rather it is an express service falling under the 1980 Transport Act, that can be initiated, altered or withdrawn with virtually no

notice. In regulatory terms, this means that it is “easy in and easy out”; but this helps mitigate against any real need to properly understand the longer-term market for any given service proposition.

The cost model means that prices are high; much higher than bus fares for scheduled bus or coach services, which benefit from spreading high fixed costs across multiple markets and achieving very high utilisation of staff and capital assets. They are not readily amenable to significant discount from regular users. To that extent the cost and tariff model resembles a taxi. Daily round-trip fares assuming near-capacity loads of 40 on a service from Sharpness to Bristol Northern Fringe destinations would need to be in excess of £8 just to break even. Sustainable service would demand both higher fares and a consistently very high load factor: something that has already proven to be highly elusive to Zeelo. The overall value proposition is challenged by the complete lack of flexibility on return times, and also the need to book.

These fundamental factors go a long way to explain why, far from “*services like these (are) running really successfully between South Wales and Bristol*” as the publication states (paragraph 8.9), the first publicly-available Zeelo service between South Wales and Bristol city centre failed within months of inception earlier in Summer 2019. There are huge challenges running and establishing bespoke services of this kind, with or without a slick digital customer interface. Several other previous attempts at scheduled commuter-coach services into Bristol Northern Fringe have failed to date, including one initiated between Weston Super Mare and BNF run by The Kings Ferry, a highly experienced operator of such services in Kent, funded for two years by North Somerset Council through the Local Sustainable Transport Fund between 2011-2013. Our own “Belles Express” from Gloucester/Quedgeley direct to the Bristol Northern Fringe again struggled to become established for a number of reasons, mainly lack of sufficient frequency and the struggle to balance demands between the key peak and off-peak destinations in Bristol.

While we believe that by consolidating development on a single, direct corridor along the A38 would demonstrably allow the kinds of operational and commercial synergies to be achieved, along with the potential for substantial bus and coach priority, to deliver a highly relevant bus/coach service/s both north towards Gloucester and south towards Bristol, from which the vast majority of other strategic allocations will derive direct benefit, and help to support, this is not true for Sharpness, nor can it be.

We note that the promoter has no intention to focus on demand from the site off-peak, except by car. As the publication states, “*We can afford to be more relaxed about how people travel outside the busiest periods*”. This exposes what really drives the strategy: not relevance to residents, or delivery of a location that offers a “credible choice in means to travel” as NPPF demands at paragraph 102, but a means to retrofit a transport solution to a location that because of its location, is unavoidably car-dependent, thus resulting in serious peak-period impacts on the highways network over a very wide geographic scale. The peak-only contract coach solution on which the promotion entirely relies, analogous to “bussing” workers in apartheid South Africa, and offering a single journey option to and from work, at best; is thus exposed as being a somewhat extreme response to an extremely ill-located promotion.

Given there will be no attempt to “gate” travel demand off-site that wishes to drive, in reality, as is exhibited all over the county and the beyond, people will continue to organise their lives to take



advantage of the overwhelming convenience of the car over any other option, in more rural areas, without a high-quality direct and frequent public transport service. Traffic volumes already are exhibiting very substantial “peak spreading” as a common and rational response to what amounts to rationing finite highways capacity by queuing. This outcome is much more likely than a high uptake of a peak contract coach service, with little or no flexibility in departure or return time, that would also be subject to exactly the same congestion as would be a car journey at the busiest periods.

#### **4. Urban design**

Both the proposed allocation footprint set out in the Draft Plan and the site context plan in the prospectus show how the proposed new town will occupy an elongated built form, running generally parallel with the Severn Estuary and extending away to the north and south from the transport hub sited at the putative rail halt. This means that the project responds less to the need to maximise the opportunities for public transport use, rail or otherwise; and rather more to other driving factors. A larger proportion of dwellings than ideal will be a significant distance from the transport hub, whether a contract coach or rail-based service is sought.

The promoters scheme for the horizon of 2041 largely sits south of the mixed use core and coach hub. A second lobe to the north consolidates development around Sharpness (Phase 1 Concept Plan).

Key structuring principles plans on page 15 show any scope for a local bus service penetrating the development areas is designed out of phase 1 except for the strategic coach route, which in effect runs immediately parallel to the rail line along the B4066 . The distances from the southern edge of the proposed development footprint to the coach hub are substantial: up to 1200m. They also visually demonstrate how the development extends away to the north west and north, with a large area immediately east of the hub in particular not proposed for development.

The generalised journey time using the coach, compared with cars, to the coach destinations will be therefore be severely compromised by extended walking or cycling trips to the hub from many trip origins within the site, even if the resident feels the arrival time and return departure time offered meet their needs. This is far from assured given the very limited choice of departures to or from the destinations sought, that could never replicate the flexibility even of a regular scheduled service running at least every 30 minutes.

#### **5. Delivery and Deliverability**

There is some divergence between what is stated in the developers’ prospectus and the language in the Draft Plan.

We note from the Draft Plan that the Council anticipates delivery starting shortly after 2025. This will be necessary to achieve 500 completions by 2030, given a ramp-up of delivery rates is pretty much unavoidable as the site is opened up with infrastructure. This is possible, but ambitious, given the timescales anticipated to plan adoption in 2021, and typical planning timescales thereafter, for submission of an immensely complex application, a suitable determination period, negotiation of s106 agreements and then discharge of conditions precedent upon commencement.

Irrespective of the sustainability or otherwise of the site, it is very well established on extensive evidence and experience, that very large developments are especially challenging and time consuming to bring forward. They then take a great deal of time to build out and achieve the levels of local services, and internalisation, on which their sustainability depends. We need not repeat references to work by a number of accepted experts in this field. We would say, though, that our extensive exposure to and proactive monitoring of development delivery across England, allows us to thoroughly endorse the veracity of this work<sup>1</sup>.

The Council's trajectory at Section 7.0 table 6 (page 197) anticipates a sustained rate of delivery of 250 dwellings per annum, which reflects the arithmetic required to achieve a 2400 unit delivery by the plan horizon. While far from unprecedented for scheme of this scale, as an extension of an existing urban area, or for a new settlement directly related to a major transport corridor or urban area<sup>2</sup> the context and overall marketability of this location, which is substantially "off the beaten track", is entirely unproven.

Even this rate of development, and evolution of demand arising from this for travel off-site is relatively sedate. To reiterate once again: there are no other existing or credibly foreseeable sources of demand in the near locality with which a combination of demands can be expected to arise, mitigating against this. Such demands as are likely to arise are expected to be split between a number of destinations, even to the south, within the West of England CA area. Thus, the site cannot take advantage from existing passing services from first occupation, much less rely on the rapid development of a deep customer base necessary to make a passenger transport offer (contract coach or otherwise) viable or attractive, by virtue of an increasing level of frequency/departure times and destinations. Indeed, by 2030, based on the trajectory and the developer's stated level of trip demand, 500 dwellings is only going to create the demand to fill a maximum of 3 40/44-seat coaches towards the Bristol, assuming a 100% coach mode share for off-site trips, itself a heroic assumption.

The costs of financially supporting just 4 contract coaches (about £400/coach round trip/diem) provided on work days only over even the Phase 1 development period from 2026/7 to 2041, nearly 15 years, will approach £5.6m. This would allow a single round trip to Gloucester, Stonehouse/Stroud and two roundtrips to specific groups of closely-related destinations in and around Bristol: hardly a lavish level of service coverage. Given how limited demand is likely to be for such an offer, we can be far from confident that a great deal of revenue could be anticipated to offset this in practice. The actual full costs of providing the full range and capacity of the contract coach service as set out in the prospectus would be greatly higher, by a multiple. However, the more likely scenario, in our view, is that should the development be consented and start to be delivered, an initial service would be trialled for a 2-3 year period, and faced with the lack of uptake and demonstrable lack of relevance and effectiveness, the developer would be likely to seek to vary the condition or terms of any obligation to remove the requirement to provide the service.

Others will no doubt comment at much more length, and with greater credibility than ourselves, on the fundamental challenges surrounding wider development costs and viability that surround a new

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<sup>1</sup> See for example *Start to Finish – How quickly do large-scale housing sites deliver* - Nov 2016, London : Lichfields and from the same source

<sup>2</sup> Kings Hill, West of Maidstone in Kent would be a good example

settlement project of this kind, on this scale, in this kind of location; that exceed virtually any other kind of scenario.

We will restrict ourselves to expressing a great concern that the project will prove to be almost impossible to bring forward within a reasonably foreseeable timescale, even assuming a very substantial central government financial support for infrastructure running into millions of pounds through such initiatives as have to date been designated as the Local Growth Fund and the Housing Infrastructure Fund. Like the majority of adopted plans that are reliant for a great portion of their delivery on very large plan-led schemes of over 2000 dwellings across England, the reality has typically been that the majority of these have stalled, or at least proven to require very longer lead times before commencement than anticipated, opening up substantial deficits in housing delivery, that require alternative sites to be identified. One needs only to look to the adjoining Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, in South Gloucestershire and at Swindon. The last named is particularly apposite where the largest allocations all have stalled, and two at Kingsdown and New Eastern Villages seem little closer to a start on site within the next 3 years of today despite many years of planning and long-confirmed allocations.

## **Wisloe Green Garden Village: Transport Strategy Commentary**

Stagecoach confirms that in addition to the material submitted on the website by the promoters as part of the evidence base to the Local Plan Review, we have been invited to participate, along with a full range of other stakeholders at the earliest possible stage of the preparation of the promotion of this site, at to formal community participation and consultation events.

Arising from these multi-stakeholder meetings, we have had separate in-depth discussions with the promoter and their client team, to help identify and shape proposals for the development, such that they maximise the opportunity for the use of sustainable transport of all kinds, not only existing or potential future bus services.

Stagecoach is concerned that the share taken for sustainable modes is maximised, not least to ensure that added pressure on transport networks from development-related car-borne traffic does not seriously aggravate current and foreseeable congestion on the highway network across a broad area, further eroding our ability to provide reliable attractive journey options within an acceptable journey time. As we make plain elsewhere in our previous and current representations the nature of the District, which exhibits low levels of self-containment and where settlements are relatively modest in size and separated by substantial distances, the focus on maximising the use of sustainable modes, and public transport in particular, needs to be at least as great as in a more urban context.

### **1. Development scope**

The allocation and promotion is for 1500 dwellings and 5 Ha of employment. This is recognised by Stagecoach as being well sufficient to support a 2-form entry Primary School within the scheme, and a level of convenience retail that would obviate the need to leave the site to meet day-to-day needs.

There has been a great deal of initial exploratory work done to understand the opportunities and the constraints on the site and accordingly, the indicative master plan has yet to evolve to something that is reasonably definitive.

Whilst the promotion is intended to deliver a distinctive new settlement, the site is closely related to Slimbridge, whose primary school is all-but-adjacent just west of the A38; and the smaller settlement of Cambridge a very short distance to the north. While the facilities offered by each are relatively limited, residents on initial phases certainly could take advantage of them from initial homes to be occupied.

The site also is very closely in proximity to Cam Railway Station, albeit the current direct pedestrian and cycle route is far from direct and quite poor. However there seem to be likely opportunities to substantially resolve this difficulty.

The site is also directly on the A38 at its junction with the A4135. As is made plain in the Sustainable Transport Study prepared by AECOM in support of the plan, this is a strategic node on the existing and potential bus network. The site both directly benefits from this, and will help to catalyse the delivery and longer-term sustainability of an unprecedented level of bus service that we expect we can make available on exactly these corridors, providing services to destinations to the north and

south, as well as Cam and Dursley as the largest local centres of services and amenities. Cam is about 2.5 km from the centre of the site, and Dursley town centre is about another 2.5 km beyond that.

There is already a commitment to build a dedicated cycleway provision along the former Dursley branch railway formation as part of the existing Local Plan commitment now underway at North East Cam. This is referred to in the Sustainable Transport Study. There are no grounds to believe that this could not be extended a very short distance across the railway and M5, adjacent to the A4135, to provide a direct dedicated active travel corridor from the site to Cam and Dursley.

## **2. Cam Railway Station**

This station is the only intermediate stop on the local service between Bristol, Yate and Gloucester, within the District, notwithstanding long-held aspirations to open new stops at Stonehouse and Hunts Grove. Itself it is a relatively recent introduction, having been opened in 1994. The original station complex closer to the A4135 is currently being redeveloped for housing.

The current facility is unmanned and has exceptionally limited facilities. Greatly increasing the level of use of the station and services, including improvements to both capacity and service frequency as set out in the Sustainable Transport Study, will require extended platforms, access for non-ambulant passengers, and a greatly increased scope for interchange as well as park and ride. The small car park at the existing site cannot be extended as adjoining land is now proposed for housing.

The current very limited bus service has to negotiate Box Road which has a seriously substandard junction with the A4135, increasingly congested with traffic, greatly aggravated by parked cars. We see these difficulties are likely to increase in the short term to the point that serving the existing site with bus services will become effectively impractical.

Thus, providing station facilities directly accessible from the A4135, and providing high quality interchange and passenger facilities represents a significant opportunity and necessary initiative. Extending the current platforms substantially southwards, and providing a new station complex facing north at the southern end of these extended platforms, incorporating disabled access, would allow for very convenient access to be achieved from both Wisloe Green and current housing commitments and proposals at North East and North West Cam. This would not be dependent on any additional stopping being introduced, nor additional train paths, in the short term. Obviously, the attractiveness and relevance of the rail service, and, indeed, the scope for any bus feeder service to become relevant, would be greatly increased should rail service frequency be uplifted to every 30 minutes.

## **3. Transport Strategy**

The key to maximise the bus mode share from the site would be to greatly enhance service frequency to at least every 30 minutes between the site and Stonehouse (thereafter potentially to Quedgeley/Gloucester), and towards Bristol via the A38, quite possibly serving Draycott and Cam first before using Taits Hill. A separate service to Dursley would also be likely to run at a similar frequency and scheduling overlay of common sections of service should aim as far as possible to create a core frequency of every 15 minutes between Cam, Draycott, Wilsloe and Stonehouse as the plan period runs on.

There may well be scope to divert the main line of the strategic bus corridor through the site between Cambridge and the A4135. This must seek to create as direct and efficient a route as possible, but would allow residents to have very convenient access to stops within the village itself, avoiding the need to rely on bus stops on the A38 itself away from the core of the development. Taking Dursley Road and the A4135 as a broad likely alignment, the majority of homes could well be well within 300m of stops.

Stagecoach is expecting to work closely with the promoters' client team to refine and optimise the urban design approach taken and secure the wider benefits this site is likely to offer to provide effective bus advantage in the wider A38-A4135 corridor between Quedgeley Whitminster and Cam/Dursley.

#### 4. Delivery and Deliverability

It seems likely that this development could be brought forward quite swiftly, taking advantage of existing infrastructure. We see this potential is recognised by the Council in its housing trajectory at section 7.0 of the plan at table 6. This indicates that 50 homes would be occupied by 2025, suggesting commencements in 2024 over at least two outlets, and implying a swift start following consent shortly after the Plan is adopted. Thereafter an annualised rate of delivery of up to about 130 homes/annum is anticipated. Thus the development would be substantially complete by about 2036. Based on what is being achieved at West of Stonehouse and looking at recent performance on local outlets, this appears to be eminently achievable and if anything quite unambitious.

However, evolution of travel demand in the immediate area needs to be considered in conjunction with the existing commitments at North East Cam, which include as many as 730 units (see table below), a further 180 units proposed in this plan as an extension, and the proposed allocation at North West Cam (Draycott) for 650-700 dwellings. Wisloe Green thus helps consolidate existing and future demands on a single corridor along the A4135 which total potentially over 3000 new dwellings, and additional employment.

SDC Reference	Site	Number	Affordable %	Comments
S.13/0448/FUL	Land opp. 6 Box Road, Cam	71	30%	Taylor Wimpey complete
S.15/2180/OUT	"Millfields" Land North East Of Draycott, Cam	450	30%	Bathurst – Bovis on site with first phase
S.17/0964/OUT	Land off Box Road, Cam	36	100%	Aster Group awaiting reserved matters
S.18/0044/FUL	Coaley Junction Dursley Road	41	30%	Newland Homes, under construction
S.19/0810/REM	Land North West Of Box Road, Cam	90	30%	Wainhomes start imminent
S.18/2697/OUT	Land West of Station, Box Road, Cam	42	30%	HLM resolution to grant
	<b>TOTAL</b>	<b>730</b>	<b>33%</b>	<b>244 affordable units</b>

The combined rate of delivery across the additional sites added to current commitments being built out between now and 2025 is estimated conservatively at just under 300/annum. We see a great

deal of evidence more broadly that this could be much faster, not least because direct access to rail service at Cam Station makes development here especially attractive to the market.

Proportionate contributions to pump-prime the bus service improvements will nevertheless be required. There would be a number of possible strategies and supporting mechanisms to effect this and we need to discuss the optimum solution to effect the best possible outcomes in line with the mobilisation of development at a suitably early stage, while also avoiding excessive costs being incurred prematurely. In particular, assessment of the appropriate scalable and phased delivery of new and improved services, which are likely to involve improved links towards the north first, needs to be agreed. Links to Stonehouse and Stroud are clearly required among other things to provide connections from those areas towards rail services to Bristol from the station from Stroud and Stonehouse, as well as links to the substantial existing and proposed employment west of Stonehouse.