

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

Policy PS30 provisionally allocates Land South of Haresfield Lane (Hunts Grove Extension) for 750 homes and associated community infrastructure and land uses, including open space.

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

Equally it would also align very well with the spatial strategy of the current Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) that focuses on urban extension to the principal urban areas of Gloucester, Cheltenham and Tewkesbury, but which has been frustrated by a lack of identified deliverable land within the City’s own boundaries and elsewhere within the JCS area. This matter is one explicitly driving the current Review of the JCS.

We agree that there is ample evidence that points to this site as a relatively sustainable option to meet housing needs arising in the District more broadly. This is because, **by virtue of its location adjoining the built-up area of Gloucester, and with employment and key public transport corridors both adjacent and in the immediate vicinity, it is highly sustainable per se.**

However, **we do not follow the logic that hypothecation of proposed Allocation PS30 towards endogenous needs of Stroud District is prudent, or properly justified** given the location of the site. This is especially relevant in the context of the clear and already apparent deficit in housing provision to meet Gloucester's housing needs within the adopted JCS, at the point of adoption, which has since been compounded by the difficulty bringing existing land within the City at Winneycroft (JCS Allocation A9) and within Tewkesbury District at South of Churchdown (Allocation A2) forward as planned to meet the City of Gloucester housing requirement. This aggravates the inability of the City to identify its own 5-year forward housing land supply, especially as recent sources of supply on previously developed land are rapidly winding down.

Allocating Land South of Haresfield Lane (Hunts Grove Extension) to meet Stroud's needs also makes little sense when other potential strategic sites exist that are much better related to existing main centres of population at Stroud and Stonehouse, in particular, as the main urban cluster within the District. These can equally well conform to the plan's development strategy, while also delivering its strategic objectives and key priorities in a place that meets the District's housing needs much closer to where they arise. Land East of Whitminster (Ref WHI014), on which focused consultation took place in late 2020 as part of the Additional Housing Sites Consultation, stands out in this regard.

Land at Colethrop Farm (Hunts Grove) both north and south of Haresfield Lane including PS30, has a long promotional history, going back at least 20 years. Land to the north enjoying an outline consent for up to 1750 dwellings and community infrastructure, with some employment provision, has been allocated since 2005, and under construction for some years.

This proposed allocation consolidates this development and will create additional critical mass of demand for services and amenities. Among these is Stagecoach service 8 that has been extended to serve the site. This uses a temporary terminus on Harrier Way. This commenced in April 2020, in the middle of the first lockdown. Remarkably, it has developer patronage very strongly along the whole route, to the point that it is the only bus route in the County that has more patronage than before the onset of COVID. This runs up to every 15 minutes at peak times, and generally every 20 minutes throughout the day, with late evening and Sunday service also being offered.

While we are pleased to point to the success of this initiative, we do have to point out that a bus service took nine years of effort to implement following the first occupations in 2011. Here, delays were partly associated with recessionary conditions, and commercial and technical pressures that led to delivery stalling for a period. However we struggled to get appropriately early access when development resumed on Phase 2. This underlines the need for all allocations in the plan to make proper provision for public transport accesses on a phased basis.

We note that the completion of the existing development, beyond 750 occupations requires completion of the development spine road to the proposed new signalised junction on the A38. We note that work on this has still yet to commence, and we are not aware that work is scheduled to commence in the immediate future. **Clearly the continuation of the existing development, for which all outstanding Reserved Matters have been submitted, is necessary to allow the next phase phase proposed as allocation PS30 to come forward.**

It would be very easy to extend service 8 to terminate within PS30, and we understand that an emerging Master Plan for the allocation anticipates providing for this. However, it appears that this is not necessary to provide convenient access for the vast majority, if not all dwellings within 400m of stops. It may well be more rational for the service to exit the site to the west, towards the A38, and either continue as a loop, or be extended to terminate beyond the site. This would, as one example, offer clear opportunities to provide a synergy between the 2500 combined dwellings at Hunts Grove and a further 1350 proposed for allocation at draft allocation G1 Land South of Hardwicke. The combination of nearly 4000 new homes on a single route, plus the extra connectivity between residential origins, and a wider range of local destinations, makes it much more likely the overall public transport provision would be relevant, attractive and effective. **The contribution of draft allocation PS30 to the transport related Strategic objectives and Key Issues of wider plan strategy for the Gloucester Southern Fringe in the Local Plan is a powerful argument supporting the reconfirmation of this allocation.**

In line with our comments elsewhere, **we have significant residual concerns about the definition of the transport strategy for the plan, and specific allocations. As result the deliverability and costing of the transport mitigations is insufficient for the plan to be considered properly evidenced, and therefore sound.** We suggest language for this proposed allocation to start to redress this lacuna.

Finally, we need to underline the need for the development trajectory to be demonstrably deliverable. We separately object to the lack of a properly evidenced housing trajectory in the plan. PS30 evidently is entirely dependent for access, among other things, on land at Hunts Grove, and the delivery of the A38 access in particular. It was originally anticipated that this would be built first and the development would proceed from west to east. Through a series of variations to the original 2008 planning permission, this has been altered, first to phase from the east, and then to further amend phasing, pushing back triggers for the delivery of the western A38 access. These have ultimately reflected viability and cash-flow constraints on the main Hunts Grove site, no doubt. **Accordingly, we consider it prudent for the Council to fully and deeply understand the timing of this infrastructure so that Hunts Grove's short term contribution to the trajectory can be properly established, and, following on from that, how far land South of Haresfield Lane (PS30) can be relied upon in the medium term.**

Thus, we consider that site G1 Land South of Hardwicke is better positioned to take advantage of existing bus service to a wider range of destinations, and also likely to be more immediately deliverable in the short to medium term, to meet housing needs: irrespective of whether these relate to the City's or the District's.

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

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

Policy PS30 must be altered to make it effective in providing for a comprehensive scheme that delivers a seamless and unified movement and access strategy prioritising sustainable modes and public transport in particular, especially along the A38 and through Cross Keys and that these measures are put in place sufficiently early in the development programme to be effective.

It should be amended to read :

...

*10. Access arrangements ~~and a layout within the site to encourage use of public and sustainable modes of transport and to encourage lower vehicle speeds~~ **which prioritises walking and cycling and access to public transport over the use of the private car by, for example, providing a network of internal walking and cycling and public transport routes that are shorter in distance than the highway network driving routes to key local destinations, in accordance with Manual for Streets;***

11. Bus stops and shelters at appropriate locations to serve the new development

*12. Contributions towards bus services to improve bus frequencies and quality; **including support to sustainable transport measures on the A38 sustainable transport corridor that ensure that cycling and public transport in particular are offered safe and free flowing conditions, including on the relevant approaches to the Cross Keys junction in particular...***

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

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

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

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

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

 Yes

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

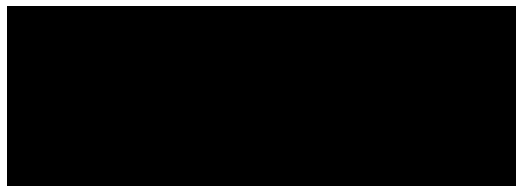
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

See main representation on Evidence Base and District-Wide Policies

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

9. Signature:



Date:

