

## **Brookthorpe-with-Whaddon Parish Council response to the Consultation request received on the 29<sup>th</sup> September 2022.**

### **EB108 Sustainable Transport Strategy Addendum**

The STS, as revised, requires a modal transport hub being provided at some point on the A4173 within the G2 site. The Plan now provides for 3,000 housing units, an increase from 2,500, but no specification for the size or location for the transport hub. Taylor Wimpey, have now indicated through their planning agents, Black Box Planning, that the “ optimum site “ has been chosen on the field immediately adjacent to St. Margaret’s Church ( “ Church Field “ ). In their Vision Document dated August 2018 released by Stroud DC a Park & Ride was placed to the rear of Whaddon Garage with access through the main site entrance with another entrance to the north of the garage.

In the Pre-Submission Draft 2021 no site is shown in Church Field for the transport hub on the map on page 160. That field is identified as Strategic Landscaping and green infrastructure, where development should be excluded. This alteration to create a green buffer zone around the listed St. Margaret’s Church and its neighbouring house is supported.

A travel interchange hub is a Park & Ride by another name. For it to be effective in reducing vehicle numbers on the A4173 then buses are the only option. Black Box Planning have now indicated that a planning application is likely to be made in 2023 and Church Field will then become the site for the hub. The creation of an additional road entrance on Stroud Road at this location is unsafe due to the bend and elevation changes. It will also sever the transport from the development rather than incorporating it with the housing and therefore fail to present a real sustainable transport alternative to future residents.

Far from being the optimum site, Church Field is by far the worst place for a transport interchange hub.

- The A4173 frontage of the G2 site under option extends from St. Margaret’s Church to the approaches of the M5 bridge with the Plan showing three entrances. The main entrance is adjacent to Whaddon Garage lay-by, one next to the Gloucester Asbestos site, with another in Grange Road. No entrance is shown at Church Field and no gateway exists at the moment, only a footpath stile. There is a blind bend at the Court Farm buildings which house an abattoir with two vehicular entrances used by farm vehicles and articulated lorries. Further around that bend is a third entrance to Court Farm, also used by heavy vehicles. To the northern direction there is a bend at the top of a rise at Pound Farm with two entrances used by farm and commercial vehicles together with private cars visiting the Farm Shop. The visibility each way is not more than about 75 yards as the whole distance is about 150 yards and the Court Farm entrances are within that distance. In Taylor

Wimpey's plan the hub will take up the half of the field nearest Court Farm so that the entrance cannot be more than about 75 yards from the blind bend. No access to the hub from within the site is shown on the developers published plans so that vehicles have to enter from the A4173. The Addendum shows the AM peak with 1,170 departures at Whaddon and PM peak at 1,161 arrivals. The Court Farm buildings are not within the option land and as this is one of only two abattoirs in Stroud District its use could continue after development of the G2 site.

- There have been numerous accidents at this point with the blind bend at Court Farm being the major cause. A fatal accident occurred at the field entrance on the opposite side of the road when a car travelling towards Stroud crashed in the field. On two other occasions vehicles left the road and demolished the fencing at the cottages opposite Church Field and the hedge in the adjoining field. These accidents were evidently caused by speeding and even though the developers say the speed limit there can be reduced this does not guarantee drivers will comply. Speeding along the A4173 is a constant threat to the village and the Police have a mobile speed camera units near St. Peter's School and one requested by the Parish Council in Brookthorpe. The unit at Brookthorpe recorded the highest number of offences in Gloucestershire that day in 2021 and the one at St. Peter's recorded almost double the number of offences as other sites in the County, in September 2022.
- A Park & Ride needs a bus service and Stagecoach have already submitted in their Regulation 19 submission that they are not prepared to provide one mainly due to severe delays at St. Barnabas and with no bus lane proposed. The Local Plan and its updated highway evidence fail to address this. The documents propose the same mitigation, being an extra lane to the approaches without adequate detail of that scheme on Stroud Road given. No road improvements specifically designed for faster bus services are planned for Stroud Road within the Traffic Forecasting Reports. Furthermore, the County Council have declined a Freedom of Information Request from the Parish Council to provide plans of the road improvements at St. Barnabas. The provision for public transport to the G2 site therefore remains unsound; as outlined by the Highways Authority submission.
- The hub has been designed by Taylor Wimpey but they are building only about 2,500 of the 3,000 houses now in the Plan. The remaining are contained within Tuffley Farm which will be twice the size of Yew Tree Estate without any access to the hub across the Buffer Zone as it will extend to about 200 yds to the West of the Church. The main route between the two sites is for bus transport only according to the revised STS. The siting of the hub at Church Field means it will not therefore serve the whole of the G2.
- St. Margaret's Church is a 13<sup>th</sup> century Grade II star listed building and is in the top 8% of listed buildings in the country. Not immediately apparent from the G2 plans, is the land owned by the Church which extends into the farmland, and which will be an extension to the graveyard as originally intended when purchased before the War. That and the original graveyard directly abuts Church Field, and both will be adversely affected by the hub with car parking and floodlighting. Historic England said in their Regulation 19 response on 23<sup>rd</sup> June 2021 that there should be a land buffer of more than 150 metres, and this appears in the 2021 Draft Plan. The whole of Church Field is within 150 metres of the Church. Historic England requires that a full and comprehensive assessment of the Church and its setting take place **prior** to

Examination of the Plan. In a letter to the Parish Council dated the 6<sup>th</sup> May 2022 Historic England said:

**“ Typically, where a statutory body such as Historic England raises a specific issue, the local authority will make contact and seek to positively address that matter. However, as this has yet to happen so the issue remains a substantive concern that I would expect an appointed Local Plan Examination Inspector would wish to focus on. “**

The STS and its Addendum have not addressed the concerns of Historic England on the protection of the Church.

- To place the hub furthest away from the main entrance to the G2 site is wrong. The original option to site the hub next to Whaddon Garage had no visibility issues, has sufficient land without any constraints, and is the middle point of the A4173 frontage. In addition to creating a new entrance where there are safety issues, the location is furthest way from the areas where most traffic movements can be captured and from the housing which it is intended to serve. Like Kingsway Park & Ride, the obvious place to place a hub is by the main entrance from the highway rather than in the Buffer Zone on a sensitive site obstructed by other offsite buildings and with visibility issues. The siting of the hub should be returned to its original location behind Whaddon Garage.
- Even if the hub were sited at Church Field the STS at Table 5-1 page 26 states that a hub would provide a reduction of just 10% of background traffic meaning that it would not achieve any significant impact on traffic usage on the A4173.

As a travel interchange hub is an essential requirement under the Plan’s sustainability agenda then its location and value, together with the availability of a bus service, should be examined and be found viable and deliverable.

### **EB98 Traffic Forecasting Report Addendum**

Subject to the revision relating to Javelin Park with the development land extending to 27 hectares from 9 the Addendum repeats the mitigation proposals from the original Report but fails to take into account the stated view of the County Council that the Plan is unsound as to Whaddon G2.

In our original Regulation 19 submission in July 2021 we copied an email from the County’s Principal Transport Planner David Simmons that the mitigation scheme for St. Barnabas did not allow for Local Plan allocations and with that additional traffic there would be “a potential need for a larger scale mitigation scheme.” In their own Regulation 19 submission the County stated that there was insufficient evidence to support the proposed G2 allocation and that the Plan was unsound.

The Addendum contains one major revision from the original, being the significantly increased traffic at Javelin Park caused by the increase of the size of the potential development. There are no amendments to the mitigation measures at the Whaddon site, principally being road widening at Epney Road and St. Barnabas junctions. No additional mitigation has been provided.

In an email to interested parties on the 4<sup>th</sup> July 2022 Nathan Drover, the current Principal Transport Planner, said:

**“Notwithstanding the conclusion that the highways impacts can be mitigated, GCC views on why the proposed Local Plan is unsound have previously be given to SDC and this includes the impacts and mitigation and those representations are attached “** ( The attachment includes the County’s Regulation 19 submission )

The Parish Council have consulted Nathan Drover to establish what they would consider to be a possible highways solution, particularly regard to St. Barnabas which is currently at capacity. Mr. Drover’s views are that whilst there may be theoretical capacity solutions at the St. Barnabas roundabout, these would fail to accord with the objectives of the National Planning Policy Framework, in particular paragraph 11, as a means of mitigation for the Whaddon site. GCC would not adopt a predict and provide approach to road widening the approaches to the roundabout which is likely to involve the acquisition of third-party land by compulsory purchase. GCC’s preference for mitigating the impact of development of the Whaddon site would be by internalising traffic/movement through walkable neighbourhoods, early provision of local services and dealing with the severance of the railway line which prevents improved access to the communities to the West. Mr. Drover stressed that it is critical that new walking, cycling and public transport access routes either by bridge or tunnel must be created to overcome the extremely poor access to local services. Without those links it will be extremely difficult to create a settlement without unacceptable additional traffic on the existing road network around the site and St. Barnabas roundabout.

As the traffic forecasting was based on a model which assumes that the capacity issues at St. Barnabas can be adequately mitigated with road widening then those forecasts are now unreliable in the light of the County’s latest views. Furthermore, as the modelling included the junctions in the A38 corridor and the road network around the Whaddon site then the forecasts for the whole area need to be re-modelled. The plans for the Network Performance in the Addendum which now show St. Barnabas without congestion in the PM peak if mitigation and STS are applied must be unsafe as with all the local junctions impacted by St. Barnabas.

The Addendum states that the impact of the Local Plan on the highway network can be mitigated by the introduction of sustainable transport measures and junction alterations at pinch points. Those sustainability measures have been amended by the STS to include additional improved bus stops and active travel improvements for the route between Stroud and Gloucester. It is predicted that with highway mitigation and sustainable

transport measures then the congestion and queuing issues can be brought down to acceptable levels over time.

With these targets in mind the Plan anticipates a bus interchange on the G2 site. This however does not take into account that the main bus operator Stagecoach has submitted in its Regulation 19 statement that:

**“There is no clear evidence that buses will not be caught in chronic peak congestion between the site and A38 at St. Barnabas roundabout. “**

and **“The policy G2 makes no reference to the potential impact of the development on already severe delays on all approaches to the St. Barnabas junction. “**

Furthermore, in commenting on the proposal in the STS for a cross link over the site between Naas Lane and Grange Road for a bus service as sustainable transport Stagecoach said:

**“A unified public transport corridor through the site will be frustrated by two adjoining land controls, each of which seem to be unwilling to provide north-south bus link through both controls “**

A scheme for a travel interchange hub and sustainable transport from within the site to reduce highway impacts cannot succeed if the main public bus operator is unwilling or unable to provide the service needed

The Addendum confirms the previous recommendation that an extra lane be added to the four roads approaching St. Barnabas. As Reservoir Road is not mentioned it is assumed that no alterations are to be carried out. The roundabout is also to be altered by increasing the number of lanes to three from two.

None of the reports involving St. Barnabas roundabout have detailed the extent of that work and how far back from the junction the extra lanes will commence. The County Council has refused to release any draft plans of these alterations and residents have not been consulted as the extent of any work to be carried out. Furthermore, Taylor Wimpey do not agree that these mitigation measures should be adopted or funded by them, and they have not yet consulted on their alternative scheme which is being modelled at the moment. Under the current mitigation measures the Parish Council has been advised that third party land will be required on at least three of the four roads. As for St. Barnabas Church while the land is not used as a burial ground it is consecrated

Gloucester City Planning Office have told the Parish Council that they do not at the moment have a view on this scheme and the impact of the road widening as the County Council is the planning authority. The Parish Council feels that as a solution to St. Barnabas roundabout and also Epney road junction are an absolute prerequisite to any allocation of the G2 this should be considered at the Examination of the Plan rather than left to a future planning application, particularly as the public have not been consulted and there are objections from both the County Council and the main public transport provider.

The Traffic Forecasting Report 2021 provided that the mini roundabout in Brookthorpe would reach capacity and experience delays with the extra Local Plan demand but that mitigation was not planned to avoid Haresfield Lane becoming a rat-run. No modelling for improvements were therefore carried out. It was suggested that mitigation at St. Barnabas and Cross Keys together with sustainable measures would reduce traffic sufficiently at the junction. This is a conclusion that the Parish Council does not accept. Also, the Report did not seem to consider the full impact of the 700 houses at Winnycroft with a further 190 at Snow Capel Farm with those developments leading directly to A4173 at Brookthorpe and Haresfield Lane.

Firstly, improving the traffic flow through St. Barnabas will only increase the number of cars going through Brookthorpe, also the development of Javelin Park to 27 hectares and the increased capacity at J12 will encourage more cars to travel along Haresfield Lane. We have many residents in our villages who work in Bristol and their route is along Haresfield Lane to J12. Going down the Stroud Road to St. Barnabas and back along the A38 to Cross Keys is twice the distance from Whaddon also with three sets of traffic lights.

Secondly, sustainable transport measures on the G2 site and Stroud Road will not affect traffic on Haresfield Lane as vehicles are going away from Gloucester and Stroud. And the main public transport provider Stagecoach is unwilling to provide a service to or on the G2 site. Without this sustainable transport cannot be achieved.

With no modelling being carried the impact of Javelin Park and J12 cannot be forecast. Congestion in Brookthorpe will become a major issue in the area, as shown in Plan h. Local Plan with Preferred Mitigation at page 21 in the Report Addendum. That shows the congestion to be on the same scale as the Quedgeley lights and Cross Keys with heavy use on the Stroud Road and Haresfield Lane.

Furthermore, the plan shows Grange Road as being congested and Campden Road to be heavily congested. With the main routes busier they will become a way of avoiding St. Barnabas and Epney Road to their considerable detriment.

Despite being a country lane with a single-track width at Chambers Farm Naas Lane is the only direct route between Brookthorpe and Whaddon to the Waterwells area including Kingsway and Hunt's Grove. It was made clear the Parish Council at an early stage by Black Box Planning that no road improvements were contemplated for Naas Lane apart from signal controls at the railway bridge. In order to comply with the STS only sustainable traffic would emerge from G2 at this point with the possibility of an improved bus service which would serve the proposed Primary and Secondary schools and also connect with Grange Road.

Residents experience constant delays in Naas Lane, mainly at the blind bends and narrow sections at Chambers Farm. There can be ten cars queueing and commercial or farm vehicles often force cars into the hedge. Traffic lights at the railway tunnel will cause more delay as cars at the moment find their own priority. Any increase in vehicle numbers, particularly buses, will only slow the traffic further.

The Department of Education have recently decided not to fund a Secondary School before 2028 and in view of the ages of Primary School children there will be an increase in car travel along Naas Lane for parents living to the West of the railway line. More importantly any residents of the G2 housing will use Naas Lane to access Waterwells and will have to go through Brookthorpe as the only route. The County Council have confirmed to the Parish Council that this is unacceptable.

The STS requires that “..each site will be expected to demonstrate how they will achieve a blanket mode shift/traffic reduction in addition to targeted measures as below “. At the moment what is being proposed for Naas Lane is traffic lights at the railway bridge and an entrance for buses and cycles only. Apart from the fact that Stagecoach do not want to provide a bus service these measures are not going to control the increase in car use along Naas Lane. With Yew Tree Farm the total housing numbers could reach 3,400 and with the increase traffic to the new schools when built a bus service to Waterwells will not achieve a blanket mode shift/traffic reduction.

For the G2 site the highway mitigation concentrates on St. Barnabas and Epney Road junction which will be the main routes into the City. The emphasis is on getting the traffic away from Tuffley, but no consideration has been given to the effect on the road network going into the City along Stroud Road and Bristol Road. There are no dual carriageways into the City on these routes until Barton Gates with the lights at King Edwards Avenue and the Quays being major choke points. Parkend Road to GL1 is constrained by traffic calming measures, bus routes, and parked cars. No thought appears to have been given about the impact of a higher number of buses and cars coming from the Whaddon site with the consequent detrimental effect on air quality.

Gloucester had major expansions in housing to the East with Abbeydale and Abbeymead, and to the South to Quedgeley and Hardwicke. It was a prerequisite in both of those cases that new road access infrastructure was built with Metz Way and the Hempsted/Quedgeley by-passes respectively. No such proposals are being suggested for Whaddon with the mitigation relying on enlarging existing junctions now at capacity and sustainable transport reducing car use to an acceptable level. Whaddon seems to rely on a Park & Ride service not used in Quedgeley and Abbeydale but the STS confirms that the reduction in background traffic would only reach 10%.

Whaddon is a site which is in effect trapped by Stroud Road and the railway line. Rather than provide transport routes into the City it is constrained by them. With the obvious possibility of housing reaching further south towards the M5 as happened in Quedgeley and Hardwicke then the Stroud Plan should be providing a scheme of mitigation and sustainability which can be relied on for the future. At the moment the land at Whaddon to be safeguarded for the City is just an extension to Tuffley without the means of sustaining itself.

As the largest strategic site in the Stroud Local Plan Whaddon G2 should not be safeguarded if it is unsound.



Councillor  
Brookthorpe-with-Whaddon Parish Council