

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

Policy PS19a allocates land at North West Stonehouse for around 700 homes and associated infrastructure and land uses. The site is referred to by the promoters as "Land North West of Stonehouse".

Stagecoach is able to **strongly support** this allocation which it believes to be **in conformity with NPPF**, to be **effective** in strongly supporting the delivery of the Strategic Objectives and the Key Priorities of the plan and to be appropriately and properly **evidenced sufficient to justify** allocation.

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

In July 2021 the Government published "Decarbonising Transport" as its plan to achieve those goals. This re-iterates the previous ministerial statement that *"we must make public transport, cycling and walking the natural first choice for all who can take it."* Unlike the 2020 paper, the plan recognises that there is a Gordian Knot between patterns of development and place-making, and transport choice and

behaviour: *"We must also do better at joining up our transport, decarbonisation, and planning goals in both urban and rural areas. Too many new developments – not just by housebuilders, but by public-sector bodies – are difficult to reach without a car."* As a result a specific commitment is made by Government: *"We will embed transport decarbonisation principles in spatial planning..."* The objectives are set and the direction of policy travel is clear.

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

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

The proposed allocation PS19a North West Stonehouse generally conforms from first principles with the requirements of NPPF at paragraph 103 which require that *"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."*

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

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

In effect the allocation represents and extension of the development allocated West of Stonehouse in the 2015 Local Plan, for up to 1350 dwellings consented under reference S.14/0810/OUT, and is now marketed and popularly referred to as Great Oldbury. This is the largest single allocation made by the currently-adopted Local Plan. We note that about 880 dwellings are the subject of full consent with all Reserved Matters agreed, and that there are currently five developer outlets ("flags") on site, such that the development is delivering at pace and at scale. It is thus evident that significant delivery momentum has been achieved here, reflecting the experience and strong delivery track record of both promoters.

This has had a direct bearing on the deliverability of public transport both to the current development and to the proposed allocation. The developer has elected to bring forward the spine road and bus road through the site substantially ahead of the 600-occupation trigger to which it is bound, making it possible for the whole of Great Oldbury to benefit from the link through, offering a baseline half-hourly service to both Quedgeley and Gloucester in one direction, and Stonehouse and Stroud in the other.

This service will be available, therefore, for first occupations on the proposed PS19a allocation, from existing stops that are within 500m of much of the proposed allocation and the first phase in particular.

A broad strategy for bus service augmentation for the site is also clearly identifiable. This will synergise very with other proposed allocations at Hardwicke Green (G1) and at the Stonehouse Ecopark near Junction 13 (PS20) which is the largest new employment allocation in the Plan. It is able to leverage, strongly, the benefits of steering development towards the Sustainable Movement Corridors, and in so doing leveraging density of flow. **This synergy makes it highly likely that a higher level of bus and coach service will be achievable to and from the site, than that which would be supportable by this development alone.** This aligns entirely with the Government's National Bus Strategy for England (April 2021) which sets expectations for "Super-routes" offering direct regular inter-urban links between main settlements in more rural areas.

We can readily envisage uplift of the baseline 30-minute frequency service through Great Oldbury rising to offer 4 buses per hour. There are a number of ways such a service might prove to be deliverable. A loop capable of accommodating a diversion of the core route is envisaged within the PS19a site, though we would not consider this to be appropriate for the main inter-urban service, and

it would serve to draw the route away from convenient pedestrian links to Brunel Way for employment, while not bringing enough new development into easy reach to warrant the added time and distance involved. However, it is conceivable that a new supplemental service within the Stroud and Stonehouse local area might find this an appropriate place to terminate at its western end.

The existing bridleway and track from the north-east corner of the site to the B4008 at Crowcomepill is an important feature. This links the furthest extent of the site, within about 400m, to the bus route that will continue to operate along this route between Quedgeley, Standish and Stonehouse, also directly serving existing employment development around junction 12 and proposed new allocations PS32 (Quedgeley East extension) and PS43 (Javelin Park). This will require bus stop improvements, and, potentially, pedestrian crossing facilities.

When considered together with the existing commitment the proposed allocation represents a consolidation of development that is likely to exceed 2000 dwellings, with two primary schools on the extended Great Oldbury, a local centre that is likely to be thriving, comprehensive sports facilities and substantial employment in the immediate vicinity. It could be expected that the proposed extension would further assist in establishing relatively high levels of trip self-containment.

The **sustainability credentials of the proposed allocation are very substantially further reinforced by the immediate access to existing employment around Oldends Lane, and that proposed at the Stonehouse Ecopark (PS20)**. Both are well within comfortable cycling distance, and many people are likely to choose to walk. The current consent is providing good cycling facilities and it is possible to envisage that these might be further upgraded to meet LTN 01/20 standards. The attractive pedestrian and cycle connectivity creates an outstanding credible alternative to personal car use for these local journeys.

Looking a little further beyond, the proposed allocation represents a relatively compact form of development that means that sustainable modes, including bus services, will be more competitive especially for journeys towards Stonehouse and Stroud beyond. Should significant off-site measures be taken to effect bus priority through Stonehouse High Street Ebley and Cainscross, as part of suitably robust measures to boost the relevance and relative attractiveness of bus services this could be transformative. Likewise we point out the obvious potential for bus priority on the A38 between Whitminster and Gloucester which will be equally necessary if the required transport outcomes sought by the plan, including a minimum global 15% reduction in car-borne journeys are to be achieved.

We anticipate that direct bus connectivity to Cam rail station will be provided from the western end of Great Oldbury. There may well be scope to bring the whole allocation closer within reach of a regular link to the station. Evidently, should a station be implemented on the existing line at Bristol Road, this would be within very comfortable cycling distance of the proposed allocation.

(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.

Not applicable

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

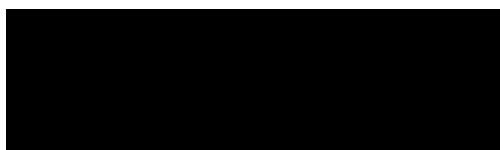
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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:

