

## 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 G1 provisionally allocates land South of Hardwicke for 1350 homes and associated infrastructure and land uses, including primary education.

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

It would be **equally and potentially even more effective in sustainably meeting housing needs arising in Gloucester** that cannot be accommodated within the City boundary, the exact figure for which will become apparent through the ongoing Review of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (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 G1 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 Hardwicke to meet Stroud's needs also makes little sense when other potential strategic sites 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.

In fact we note that it was the JCS Inspector who concluded first that bringing Land South of Hardwicke forward to meet unmet identifiable **needs within the City of Gloucester** was justified. This is expressed in her Preliminary Findings dated 16<sup>th</sup> December 2015 (EXAM 146). So persuaded was she that an explicit instruction was given to the JCS Authorities to pursue a Memorandum of Understanding to allocate the land for this purpose in a Review of the Stroud District Local Plan.

This was picked up in Main Modification 022, which explains the rationale for this requirement:

*"However, due to significant constraints and availability of land it has not been possible to allocate sites in the JCS to meet all of Gloucester's need over the plan period. Nevertheless, Gloucester has a good supply of housing land for the short to medium term that will enable it to meet its requirements to at least 2028/29. This will allow adequate time for an early review of the plan to explore further the potential for additional sites to meet Gloucester's needs in the longer term towards the end of the plan period. This would also allow the consideration of additional development options that may become available, both within and outside the JCS area. This could include the unlocking of further development opportunities within the urban area, as well as potential new urban extensions in Tewkesbury Borough and Stroud District or elsewhere within the housing market area. The JCS authorities have a Memorandum of Understanding in place with Stroud District in this regard."*

Since that time, the anticipated housing supply to meet the needs of the City has not, in fact, come forward to the extent required, including in Tewkesbury Borough. Accordingly, it makes sense for the most sustainable and most deliverable urban extension sites in Stroud District - which are also not covered by Statutory Green Belt designation - to come forward to address this supply deficit.

We consider that G1 is likely to be that site.

#### **Stagecoach commentary on the proposed G1 allocation**

Land South of Hardwicke related directly to the A38 movement corridor, on its eastern boundary. This is a relatively fast dual carriageway, but the character of the road is already changing as urbanisation has taken place on either side in the immediate vicinity. At this point a legacy grade-separated junction exists, providing an overbridge towards land that is the western extent of the Hunts Grove commitment that has been carried over two Local Plans. In connection with this, major works are planned that will provide an all-movements junction at this point. In so doing, pedestrian and cycle connectivity east of the A38 will be achieved, and the severance effect of the A38 will be substantially diminished.

The A38 already accommodates the main regular bus routes between Stroud Stonehouse and Gloucester through the area; and the longer-distance services towards Cam and Dursley that run less frequently. **The convergence of a number of such bus corridors at this point, all of which the draft Sustainable Transport Strategy anticipates will increase in frequency, offers a very unique opportunity.** Not only will service quality and frequency be improved into Gloucester via two potential routes - Cole Avenue and Stroud Road on one hand and A430 Secunda Way on the other - but greatly improved connectivity to Stonehouse and Stroud will also be readily achievable. Bus journey times to existing and proposed major employment at Oldends Land and the J13 Ecopark (PS20) will be especially competitive with driving, as will frequencies that we consider could well sustain 4 buses per hour.

Bus stops towards the north east corner of the site are likely to offer initial phases direct access to existing and improved services on the A38. As the site comes forward, and builds out towards the west

as we would anticipate, the quality of this direct inter-urban provision would be sufficient to support longer walks from within the scheme, or, potentially cycling if secure cycle parking were to be provided.

This new A38 junction will form a significant new node, and this includes its potential role in the future bus service provision for the immediate area, allowing the city network to evolve and extend in a number of ways to directly serve the proposed allocation. Stagecoach service 8 currently has a temporary terminus within Hunts Grove at Harrier Way. While it might well extend to terminate within the Hunts Grove Extension (PS30), this is actually not necessary to bring most of those properties within reasonable walking distance of the service. It may not be expedient, either. Extending the service 8 to the A38 junction offers a range of possibilities, to create new connectivity, and this is one option that might directly serve proposed allocation G1.

Nor is this the only, or even the exclusive option. The main Quedgeley service 12 comes within a short distance of the north west corner of the site. The extension of the current terminal loop is not an expedient strategy, but a number of options clearly exist that could rationally allow Hardwicke Green to be served via Severn Vale Drive in Quedgeley.

Thus, the proposed allocation directly aligns with a strategy that is expressed at CP5, CP13 and EI12 and DEI1, that seeks as far as possible to direct development towards sustainable transport corridors where high standards of services can be provided. Furthermore, with some thought and care it should be possible to provide good public transport choices at all stages in the development trajectory. However, we are concerned that there is no explicit requirement in Policy G1 for delivery of bus permeability through the site at a suitably early stage.

The sustainability credentials of the site are far from restricted to public transport. The site lies directly adjacent to the Quedgeley West employment park. To the north east the site fronts the B4008 Bristol Road and it is a relatively direct and quiet cycling route that crosses at A38 at the Naas Lane overbridge leading directly to a range of facilities, including a large medical centre and two supermarkets, and thereafter the extensive Waterwells employment site. Via the B4008 overbridge to the east of the site another link provides access to Waterwells from the south west, and then via Haresfield Lane to Quedgeley East. Haresfield Lane will be upgraded and realigned to provide safe and much higher-quality cycling facilities towards existing employment south of the M5 including proposed allocation at Quedgeley East (PS32) that will consolidate the current allocation being brought forward by St Modwen, and which we would separate expect to provide safe segregated cycle and pedestrian connectivity directly from Haresfield Lane.

A range of other facilities including secondary education are within walking distance to the north within Quedgeley, and the degree of pedestrian permeability though and beyond the site is actually quite high, with opportunities to provide both attractive and direct routes. The potential to damp car use, and resulting congestion, in this way is accordingly relatively high.

**The range of credible alternatives to car use for these kinds of trips, especially at peak times, is therefore as high as anywhere in the District.**

Nevertheless, we remain concerned that the plan, having clearly identified the probability of serious network stress on the A38 in this area on all approaches to the Cross Keys Roundabout within the Transport Forecast Report (2021), fails to say much if anything about how this will be addressed, at what time, and how any mitigation will secure the aim of making walking, cycling and public transport more reliable, faster and more attractive at this key point on the public transport network.

**While public transport, walking and cycling could support high sustainable mode shares, this is far from being assured by default. This great potential could be entirely frustrated by the apparent intention of the County Council to pursue a "predict and provide" approach to mitigation which seeks as its first objective to maintain and improve journey times and reliability for general traffic.** This cannot secure mode shift. Given that the same transport evidence base requires, and assumes a general damping of car journeys by 15%, the current mitigation strategy in the area is highly inconsistent and incongruous with the plan's Strategic Objectives and Key priorities.

The absence of any mention at this point in the plan of these impacts, and likely mitigation requirements that favour sustainable modes, which are clearly indicated in the transport evidence base, is a real concern. **We consider that the plan needs to go much further to define and evidence the sustainable transport strategy more generally, and in this area specifically. While this should not prejudice the allocation *per se*, it does need the Policy to be much more robustly worded.**

(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 G1 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 :

...

11. A layout which prioritises walking and cycling and access to public transport over the use of the private car by, for example, providing a network of internal walking ~~and~~ **cycling and public transport routes** that are shorter in distance than the ~~highway network~~ **driving routes to key local destinations**, in accordance with Manual for Streets;

...

13. Contributions and 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;**

...

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

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

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

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

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

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

  
Yes

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

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

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

See main representation on Evidence Base and District-Wide Policies

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

9. Signature:

Date: