

## 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 PS37 allocates land at Wisloe for a New Settlement of around 1500 homes and associated infrastructure and land uses. The site is referred to by the promoters as "Wisloe Green".

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 PS34 Wisloe New Settlement 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.

The identification of Wisloe as a New Settlement, directly on the junction of 2 Sustainable Movement Corridors is entirely consistent with the spatial strategy. This offers **very particular scope to achieve significant augmentation of the bus and coach service offer serving the site and the wider plan area, which is currently quite limited. This is a particular and unique merit of this site.**

**A broad strategy for bus service augmentation for the site is clearly identifiable.** This will synergise very well with other proposed allocations at NW Draycott and around junction 12 of the M5, reflecting 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.

**From September 2021, the baseline bus service position will change.** This will strengthen connectivity between Cam, Dursley and Stroud, using the more direct route via Uley and past Nymphsfield. Among other things, this also avoids peak congestion currently experienced by service 61 between Stonehouse, Ebley and Stroud.

It will also retain the hourly link today provided by service 61 between Dursley Cam and Stonehouse, including the major employment sites West of Stonehouse. From there it will continue every hour to provide and enhance the through links to Quedgeley and Gloucester offered today by service 60, but only every 120 minutes. In so doing it will also pass substantial existing, committed and proposed development south of M5 junction 12 including PS32 Quedgeley East Extension and PS43 Javelin Park. Given that the railway already offers a much faster and more regular link than service 60 does today from this area to Gloucester City Centre, the improved hourly facility to Quedgeley and Gloucester’s southern districts is further improvement in service, on which the plan strategy and allocations including PS37 in particular can build.

We would see the currently hourly links between the site, Cam Dursley and Stroud in one direction, and to Stonehouse and Gloucester in the other, being improved to operate at least every 30 minutes on a “stand-alone” basis: that is to say were no other development to be brought forward in the wider

locality. Once committed development at Millfields and that also proposed in the plan at PS24 Cam North West (North West Draycott) and PS25 (Cam North East extension) is considered, then it ought to be possible to envisage significant further augmentation to local service connectivity and frequency.

The sustainability credential for public transport are very substantially further reinforced by the immediate access to the Cam Station- the only station in the District on the Bristol-Gloucester/Cheltenham/Birmingham rail line. The attractive pedestrian and cycle connectivity creates an outstanding credible alternative to personal car use for longer-distance journeys.

Direct pedestrian and cycle connectivity to Cam rail station is proposed by the applicant across the M5, and this represents a very material opportunity for a significant number of off-site trips to be made by rail. This places the site within 1200m of the station facility with a direct segregated pedestrian and cycle route. Given these proposals, the current lack of station Park and Ride capacity seems largely irrelevant.

The current hourly rail service is well established, and we note the use of this service has grown immensely in the last few years, demonstrating its relevance even in its current form. This links to a large number of key destinations to the north and south where both empirical evidence and the transport evidence base make plain a large number of peak journeys assign, especially to the south. The improvement of this service to run every half-hour as an extension of MetroWest Phase 2 within the West of England is one that the Gloucestershire Rail investment Strategy (GRIS) indicates is one of four key investment priorities for rail in the County, and one that is assessed to offer very high value-for-money.

The site also will benefit from attractive walking and cycling connections both for recreational use, but most importantly, for other regular journey purposes. Segregated cycle facilities can be extended to the site from Dursley and Cam. While it is a distinct new settlement, the relatively short distances involved greatly support high levels of active travel from the site, as well as bus use, especially with greatly improved frequencies being on offer from the development.

(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

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

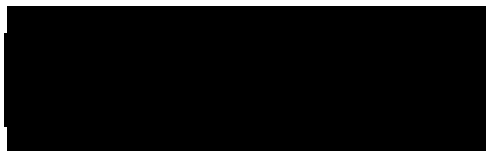
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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:



ate:

