

27th June 2021

Stroud District – Local Plan Review

Pre-Submission Draft Plan – (Regulation 19 Consultation) May 2021

Comments

My comments are directed towards the proposals in the Plan regarding the land identified within 'The Gloucester Fringe' referred to as 'G2 Land at Whaddon'.

I note that the proposed G2 site is put forward as a possible site to meet Gloucester City housing needs and is not required by SDC. It seems that the outcome of the JCS decision on whether this land is required for Gloucester City is still awaiting a decision.

On the 26th February 2020 the JCS corresponded with SDC and with reference to G2: Land at Whaddon supported the safeguarding of the site to meet Gloucester's housing requirements, subject to the ongoing JCS Review and supporting evidence base.

It acknowledges that St Barnabas roundabout was already operating beyond capacity and goes on to say that: This remains a significant concern for Gloucester City Council in terms of Highway safety. It is critical therefore, that in advance of any formal allocation, SDC and Gloucestershire Highways are comfortable that the additional traffic generated by the site on St Barnabas Roundabout, and the wider highway network can be appropriately mitigated.

Please take note of the reference to 'in advance of any formal allocation' etc. also. 'and the wider highway network'.

The reference in the Pre-Submission Draft Plan, (page 78), to Planning Constraints and Designations for this site refers to the physical constraints of the Floodplain and the proximity of the M5 and the Bristol-Birmingham Railway Line.

I believe that because the site proposed for G2 is squeezed between the railway line and the motorway that it presents particular problems for road users with entry and exit to the proposed development area. The Railway Line is perhaps the biggest restriction and the Railway Line already poses problems with single carriageway (priority lane) at Tuffley Lane, single carriageway (traffic light control) at Grange Road, single carriageway (no control measures) Naas Lane and finally the main road in Haresfield, using a bridge over the railway line with width restrictions.

There will only be access to the development from the A4173 Gloucester Stroud Road. This leaves the whole of the site effectively 'boxed in'. Because of the Railway Embankment there are not even any alternative options to move anywhere on the site by Walking or Cycling other than within the site itself.

It seems difficult to reconcile this with SDC Core Policy CP5: Environmental development principles for strategic sites.

It is obvious that the local highway will be severely impacted by a development of the size proposed. Already the route into Gloucester has large tail backs of traffic at peak times and the additional impact on the Gloucester-Stroud Road would be massive. Proposals to 'mitigate' this impact by improvements at St Barnabas Roundabout are only part of the solution.

Traffic from the South of Gloucester already make extensive use of the local 'Rat Run' of Upton Lane, from Winneycroft/Matson into Brookthorpe and then also Haresfield Lane and towards Junction 12

of the M5. Also, Naas Lane has seen a huge increase in traffic following the Waterwells and Hunts Grove development.

The recent Mott MacDonald 'Stroud Local Plan Traffic Modelling' Report, published in March 2021, identified potential problems with the identified 'Rat Run' (Upton Lane from Matson/Winneycroft – Haresfield Lane to M5 Jnc. 12) but did not suggest any solutions and in fact positively recommended NOT improving for example the Brookthorpe/ Haresfield Lane junction as this may encourage additional use. See Table 6.3 of the report ID6.

In the report it mentions the G2 development as being for 2,500 houses however, this is now shown as 3,000 in the current Local Plan! Is this really the way to approach how to deal with a major development proposal where it is clear that the local Highway infrastructure MUST be upgraded to cope with additional demand.

In the report, below the Table Figure 7.4 on page 63, the paragraph spells out what are clearly anticipated problems. Paragraph 7.4.7 referring to ID6 – A4173/Brookthorpe, on page 67 then attempts to justify not addressing these issues by claiming improvements at Barnabas and Cross Keys Roundabout will reduce traffic using the 'Rat Run'. Dream on drivers will always use the most direct route available to them.

Haresfield Lane is a barely dual carriageway width lane with several 90degree blind bends on the route from Brookthorpe to Haresfield. In Haresfield the local Primary/Junior School is located on a 90degree bend and is already congested at peak school start/finish times and the solution is 'do nothing'. Shameful abdication of what should be addressed now, not when there is a massive increase in traffic.

Interestingly, it also appears the Mott MacDonald report did not seem to take into consideration the additional housing of some 700 units in the Winneycroft/Matson area and the impact this would have on Upton Lane and Haresfield Lane.

So therefore, having regard to the section of the SDC Local Plan, items 14, 20 and 21 on Pages 158/159, it is clear any developer MUST contribute to improvements, not just on the A4173 but also the wider Highway network.

So, it all depends on whether JCS/Gloucester City will require this site, or will it? I see that the developers will most likely be approaching the 'Inspector' to include the G2 site due to its Regional importance. So much for Local Democracy if that does become the case.

Regards,

Paul GAZE