

**Whitminster Parish Council**

**Technical Response to Stroud District Council's  
Local Plan Review  
Draft Plan Additional Housing Options Consultation**

**OBJECTION ON HIGHWAYS AND TRANSPORT ISSUES  
TO PROPOSED MIXED USE DEVELOPMENT  
ALLOCATION REFERENCE WHI014 AT  
GROVE END FARM GROVE LANE WHITMINSTER**

Technical Report 29633/2A  
January 2021

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## Introduction

1. This technical report has been prepared on behalf of Whitminster Parish Council (the Parish Council) in respect of the “*Stroud District Local Plan Review Draft Plan, Additional Housing Options*” dated October 2020.
2. The main settlement of Whitminster Parish lies off the A38 on the western side of the A38 with the crossroads with Grove End Lane being the existing main focus for the services for the village. The proposed allocation would be a significant “*bolt onto*” the settlement that would shift the centre of the enlarged community much further to the east.
3. A detailed set of reports including this report, which considers highways and transport issues, have been commissioned by the Parish Council in response to Stroud District Council's (the Council's) Draft Local Plan Additional Housing Options public consultation process. A Planning Assessment has been prepared by MSP Town Planning and Architecture, and that has been separately submitted.
4. The reports are in respect of a proposed mixed use development allocation at Grove End Farm, Grove Lane, Whitminster. The proposed allocation being referenced as WHI014.
5. In support of the proposed allocation, the promoter has submitted a set of detailed technical assessments / justifications including a “*Position Statement (Update)*” (PSU) dated October 2020 prepared on behalf of Robert Hitchins Limited.
6. This report, and that of MSP have been structured in response to the various questions posed in the consultation process. This report however does not unduly repeat the objections of MSP.

## Objection Summarised

7. Whitminster Parish Council object to the potential allocation of WHI014 and this forms the focus of the various consultation responses on their behalf. This response and that of MSP do not supersede any of the previous objections made by others in this regard.
8. Local people including the Parish Council are rightfully concerned about the Council's proposals in their Draft Local Plan as currently drafted.

## Settlement Tiers

9. Whitminster is a tier 3 settlement defined as being “*Accessible Settlements with Local Facilities*”. It is not a higher level tier 1 settlement defined as main settlements such

as Stroud, Cam and Dursley, and Stonehouse or a tier 2 settlement defined as a local service centre such as Berkeley, Minchinhampton, Nailsworth, Painswick, Wotton-under-Edge, and Hunts Grove). It is interesting to note that the developing Hunts Grove is anticipated to be a tier 2 settlement as developed and as such if this potential allocation were to be confirmed then Whitminster would also be likely to be a Tier 2 Settlement as a starting point for assessment in future plan allocations.

### **Council's Housing Requirement**

10. As such if the proposed allocation is confirmed it would in subsequent plan periods be much harder to resist the spread of this relatively isolated settlement.
11. The Draft Local Plan's "*Additional Housing Options Consultation*" has been instigated by the Council as part of a response to the Government's proposed change to the methodology for calculating the minimum housing requirement for each local authority.
12. This revised Standard Method proposes an increase in the housing requirement for Stroud District from 638 homes per annum to 783 homes per annum. Based on current monitoring, the Council estimate that this could equate to the need for an additional 1,050 to 2,400 new homes in the period up to 2040.
13. The Council is therefore consulting on additional sites for housing that could be bought into the Local Plan if the Government were subsequently to confirm the revised methodology.
14. These sites the Council have suggested would also potentially act as a '*reserve supply*' to ensure the Local Plan delivers the housing it is already required to provide.

### **Allocation Objection**

15. This report provides a technical highways assessment in relation to question 9A contained within the Additional Housing Options Consultation which questions:  

***“do you support / object to site potential growth site 1 (PGP 1) Land at Grove End Farm, Whitminster”.***
16. The Parish Council have chosen not to comment on sites outside of the Parish itself. This report does not comment on any of the options A to D in detail save for the specific proposed allocation of WHI014 at Grove End Farm. It is for other Parishes to comment on options within their Parishes.
17. WHI014 is essentially option C that relates to being "*an entirely new settlement or a very large addition to an existing smaller settlement with a full range of land uses including employment as well as housing*".

18. The commentary to the option indicates that the choice is for the development along the A38 or the A419 or the A4135 corridors but that the A419 and A4135 corridors have been effectively discounted for this purpose as they are either built upon already or have environmental constraints or have "*already been assessed as potential urban extensions to our towns*".
19. The Council's consultation indicates "*there is more potential along the A38 corridor and this consultation identifies two particular locations which may have potential*" as sites PGP1 and PGP2.
20. PGP1 is WHI014 which is a new potential site. Part of the WHI014 site has been previously promoted but discounted by the Council.

### **Allocation Preferences**

21. The Parish Council generally support a combination, as outlined in the MSP report, of the Option to Intensify, and the Option of Wider Dispersal should additional housing land be required. The Parish Council opine that the Option to Intensify should be fully explored first before any other options are explored.
22. The rationale is that this option would make the most of the highest tier settlements with the best opportunities to provide sustainable housing closest to existing services and facilities.
23. The Parish Council's view being that a wider dispersal of housing with small amounts of housing spread between a number of settlements would assist in the viability and vitality of existing communities. This dispersal would potentially increase the sustainability of each community by increasing the viability, and vitality of the smaller communities.

### **Sustainable Communities**

24. New core policy in the Draft Local Plan, DCP1 "*Delivering Carbon Neutral by 2030*" clearly states that all new development should be designed to discourage the use of the private car, irrespective of fuel source and should prioritise (in order of importance) walking, cycling and public transport.
25. By locating a major housing site between two major A roads and the M5, on a major interchange this clearly and self evidently encourages use of the private car for day to day travel needs including outward commuting to employment and services directly contradicts the aims of this policy.
26. The opportunity for walking (being the highest ranked preferred mode of transport) to

access services and facilities beyond those offered at a local level would be extremely low, particularly when compared to those at other strategic sites. The potential allocation of this site would also a considerable distance from a railway station and is poorly served by public transport.

27. Whilst Whitminster Parish Council has been and will continue to be supportive of small scale developments that serve and support the local community, and has accepted a number of these in recent years, it cannot support a significant development of this scale that would subsume the existing village.

### **Village Design Statement**

28. A Village Design Statement (VDS) produced in 2014 has been prepared for Whitminster. The VDS relates to the Stroud Local Plan, and sets out:

*“design guidance against which any planning applications can be considered, and which informs the Local Plan design policies in more detail with specific reference to Whitminster. The VDS cites local evidence and knowledge from both the people and the place. Households and developers are able to be informed by and understand what will respect that parish context and can be incorporated into any development proposal.”*

29. The proposed allocation would not respect the VDS, and would run as detailed subsequently counter to local evidence and knowledge.

30. The VDS indicates with respect to highways:

*“Whitminster’s roads show the effects of significant use and lack of maintenance/ investment and there are concerns about road safety. This is particularly true in the village at the key junction with the A38 and along School Lane – the main route for pedestrians to walk to facilities, including shops and school. Should new housing developments take place, then that opportunity could be used to improve existing linking roads, paths and pavements, not increase pressure at pinch points. This enhancement could be possible when a potential Developer and the Parish Council discuss use of a Community Infrastructure Levy or Section 106 agreement. However, it is the responsibility of the Local Highways Authority to maintain roads and pavements, and keep them in good condition. Usually, any financial contributions from developers are for new infrastructure.*

*More residential vehicles are required in this rural parish due to limited public transport routes (see local census figures on car ownership on page 78). There are problems now with on-street parking in places like School Lane, The Close (see photo of The Close on page 32) which give rise to concerns over community safety (Parish Map on page 2) With District and County Council advice, agreement can be reached over road safety improvements and the building of safe cycling paths and footpaths.”*

31. The VDS self-evidently envisaged a lower more sympathetic level of development within the settlement. As part of the VDS process the community completed a questionnaire regarding the choices on which local guidance should be based including:

i) What is important about living in Whitminster?

Good access to major road networks	13%
Close to my place of work	4%

The factors that the promoters cite as being the preference for such a new settlement did not feature in responses.

ii) Where is the location of the village in relation to your employment?

I am employed within 5 miles	14%
I am employed over 5 miles from my house	43%

If employment was available I would like to work in / close to the village	4%
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The existing travel patterns confirm that the existing settlement is effectively a dormitory settlement with commuting to employment some distance away, and even with a mixed use development with some modest levels of employment that would be likely to remain the case.

iii) What type of housing development would you prefer for the village in the future?

Single houses in gaps (infilling)	33%
Small clusters of up to 5 houses	34%
Medium development of 5 to 20 houses	11%
Large development of 20 to 50 houses	2%
Extra large developments of over 50 houses	0%

The existing community simply expressed no preference whatsoever for significant development within the Parish.

32. Appendix 7 of the VDS with regard to employment location indicated additionally as an expansion of (ii) above that:

Working from home	4.8%
Travel less than 5km	10.5%
Travel between 5km and 40km	77.5%
Travel more than 40km	7.2%

33. The majority of residents who commute for work outside of the Parish and who may have no choice but to commute which amounts to 84.7% travel relatively long distances to locations such as Cheltenham / Gloucester to the north, and South Gloucestershire / Bristol to the south.

### **The Proposed Allocation**

34. The land is located bounded to the east by the M5, to the south by the A419, and to the west by the A38. The land sits effectively adjacent to M5 junction 13, and to the A38/A419 junction to the south. It is strategically located for very easy access onto the primary road network.
35. Such an allocation would appeal self evidently to potential residents who may choose to travel along the M5, the A38, and the A419 corridors to employment much further afield.
36. The proposal is a mixed use development in an area described by the proposers as being “*sustainable, highly accessible (including by public transport) location*”.

### **The LUC Assessment**

37. The LUC “Sustainability Appraisal Findings for the Stroud Local Plan Review Additional Housing Options” report dated October 2020 indicates the rationale for the option C indicating:

*“A new growth point would support new service and infrastructure provision which could help to reduce the need to travel by private vehicle in the plan area as well as potentially supporting infrastructure which could support the use of energy from more sustainable sources. Importantly, it would also ensure that housing need in the plan area is met by delivering a high level of development at a single location. This approach could also support a large amount of affordable housing delivery in Stroud District.”*

38. However, the report also indicates that:

*“Option C1 (A38) performs slightly less favourably than the other two*

*sub options considering that many of the settlements along this route (including Stone, Cambridge, Newport and Whitminster) are presently less developed and provide access to a lower number of services and facilities and jobs. These effects also reflect the strategic road access (including the M5) from this area towards Gloucester and Bristol which, when considered in combination with the lower existing job provision in the area, could promote some out commuting. However, the existing strategic road access could also help make the area more attractive to inward economic investment and therefore this option performs strongly in this regard.”*

39. The LUC report appears to acknowledge the Parish Council's concerns that the strategic nature of the location would appeal to those who would seek to travel much further afield. The conclusion of the LUC report being:

*“It is recommended that the Council continues with a hybrid approach to the spatial strategy. Using elements of Option A would achieve benefits associated with the higher densities of development and more efficient land use. However, considering that it would be difficult to achieve the required level of housing through this option alone, a large scale growth point along the A38 (Option C1) or A419 (Option C2) might also be pursued. This could secure substantial new infrastructure provision, affordable housing and promote inward investment as well as delivering the required level of housing development. Furthermore, development at the A38 may prove particularly attractive to potential investment given its access to the M5. Development at this route could also be delivered to compliment the development within the South Gloucester fringe area at Hardwicke where there is access to existing services and facilities as well as job provision.”*

### **The PSU**

40. The PSU indicates a development potential of approximately 2,250 new homes together with employment land, a local centre, sports / recreation facilities and two primary schools. In addition, the usual landscaping and open space requirements are indicated as being capable of being accommodated.
41. The levels of employment land in respect of total GFA, or its type in respect of business park, manufactory, high tech or warehousing are not defined at this stage, and neither



is the extent of or the content of the local centre.

42. The PSU indicates:

*“The proposed local centre is positioned so as to be accessible to existing residents of Whitminster as well as to new residents.”*

43. The PSU also indicates that:

*“Employment generating uses are incorporated both within the local centre fronting the A38 and alongside the A419 near junction 13 of the M5 both attractive locations to the market and thereby increasing delivery prospects.”*

44. The PSU includes an “Emerging Concept Plan” which indicates a total of six primary accesses namely:

- i) The creation of a fifth arm onto the A38/A419 roundabout,
- ii) An access to serve the potential employment uses located off the A419 approximately half way between the A38, and the M5 junction 13,
- iii) An access off the A38 to serve the residential elements,
- iv) A further access off the A38 south of (iii) to serve the local centre, and residential development beyond,
- v) Two accesses off Grove Lane, and
- vi) Whilst not clear the Concept Plan shows the link from the A38/A419 roundabout crossing Grove Lane.

45. Neither the PSU nor the LUC report have assessed the ability of either the local or the wider highway network to accommodate the development, and neither have either report assessed the capacity of any of the proposed access points.

### **Access**

46. At this location, the car is seen as a necessity not just for commuting but also to reach shops, services, secondary schooling, entertainment facilities, etc. This is the economic and practical reality.

47. Notwithstanding the proposed employment area, there can be absolutely no guarantee that the proposed employment land would be used by local residents. The simple issue is that if the employment areas are developed first then employees would be likely not to be derived from the residents of this proposed allocation, and if the proposed housing areas are developed first then those potential employees from the residential area would have gained employment elsewhere in the intervening period. There can simply be no guarantee that such employees would change their jobs

subsequently once the employment land associated with the potential allocation site had been developed.

48. The proposed development would otherwise be in an area of relatively low local employment and therefore in all likelihood will become a dormitory settlement increasing commuter miles and therefore leading directly to the production of harmful emissions. It would inevitably lead to commuting trips to Gloucester and Cheltenham to the north, and Bristol to the south inevitably.
49. Access to the limited facilities locally will almost certainly be by car which will increase traffic flows placing additional demands on infrastructure.
50. There can be no doubt that the building of homes at Wisloe Garden Village along with the large number of other proposed homes in both the Cam and Berkeley clusters will further stress the current road infrastructure in the immediate vicinity of Whitminster along both the A38, A419 and M5 corridors. Furthermore, the developments further afield such as at Hardwick to the north and Falfield to the south will only serve to accentuate this. There is no evidence within the PSU or LUC reports that the cumulative impact of this has been assessed.
51. Whilst, transport and transport planning do not fall within the strict remit of the Council, it has obligations through the planning process to consider the effects of developments on road infrastructure. The Department of Transport Circular 2/13 concerning The Strategic Road Development and the Delivery of Sustainable Development notes the following:

*“Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”*
52. There is no evidence within the PSU or the LUC to demonstrate that there has been any engagement with Highways England regarding the impact of the proposed allocation on the strategic highway network including at the M5 junction 13, and no evidence of the assessment of the cumulative impact either through the junction or on any link feeding the junction or further afield.
53. Similarly, there is no evidence to demonstrate that Gloucestershire County Council as

the highway authority for the A419, and A38 has been consulted regarding the impact of the proposed allocation on Country primary roads.

54. There are no local railway stations to accommodate rail travel within an easy walk, cycle or drive of the potential allocation. The proximity of the Cam and Dursley railway station could be argued to be an alternative to the car. However, access and parking at this station is now a major issue. There is anecdotal evidence to suggest that the Gloucester / Bristol line is itself operating to capacity.
55. The PSU indicates at paragraph 4.4 under baseline conditions that:  
*“The location of this land near to the A38/M5 and A419 corridors, and relative proximity to Stroud/Stonehouse provides an opportunity for a range of sustainable transport options.”*
56. That commentary reinforces the expectation that the proposed allocation would be none other than car orientated due to those strategic links. There are simply no assessments within the PSU that such links have adequate capacity, or could have adequate capacity to accommodate the proposed allocation, and as such the proposed allocation fails NPPF paragraph 108 bullet point (c).
57. Furthermore at paragraph 4.5 that:  
*“The Site is located on the Main Movement Corridor as defined in the Stroud Sustainable Transport Strategy and where integrated packages of initiatives can be delivered.”*
58. The commentary at paragraph 4.5 as detailed above has to be read in conjunction with the more detailed paragraph 4.11 that:  
*“The Stroud Sustainable Transport Strategy (November 2019) prepared by AECOM, identifies three main movement corridors where integrated packages of initiatives can be delivered, which can “showcase multimodal use with a focus on sustainable travel modes”. The Site at Whitminster is well placed to support this approach being located at the central ‘Hub’ of the ‘Movement Corridors’. Development of the Site will enable people to access services and facilities elsewhere along the movement corridors. The location is where there is the best chance to obtain improvements to community infrastructure, services and facilities and bring about coordinated improvements to accessibility, connectivity and public transport as a direct result of development. The Site is in relatively close proximity to the main settlements of Stroud, Stonehouse and Cam/Dursley which will provide residents with a choice of*

*sustainable travel modes to connect to the key centres in the District with ease.”*

59. With regard to public transport, paragraph 4.12 is clear that:

*“Public transport in Whitminster is currently modest, however substantial improvements will take place associated with committed development at Great Oldbury, West of Stonehouse. This will provide an additional half hourly bus service from Whitminster to Stonehouse and Stroud to the east and Gloucester to the north. Locating development on existing or potential high-quality public transport corridors represents some of the most sustainable options for any development strategy. Opportunities to build on these corridors by increasing service frequency and reliability will ensure public transport is highly competitive with car use. Stagecoach supports the delivery of development alongside the A38 corridor at Whitminster as it would help to catalyse the necessary step change in bus service provision needed to help meet the Council's wider sustainability goals, including carbon neutrality. The project team has liaised directly with Stagecoach in order to obtain input from the Company to inform the access strategy to serve the site and ensure that its aspirations for public transport in the area are considered from an early stage.”*

60. The PSU confirming at paragraph 4.13 that:

*“Access to the Site is proposed to be from the A38, A419 and Grove Lane. Being located alongside key road corridors close to M5 Junction 13 provides good access to the strategic road network which is important for access to the proposed employment area located alongside the A419. It also provides a unique opportunity for the Site to facilitate an ‘Interchange Hub’ for seamless multi-modal integration. In addition, the Site offers the potential to secure a location for a ‘Strategic Interchange Hub’ providing for longer distance connectivity via express services to major conurbations. The development proposals include a local centre sited between the existing village and new population which would create a focus for the existing community as well as the new one. This together with the provision of primary schools, community facilities and employment would increase self-containment and encourage walking and cycling modes of travel. Access to the Site from the A38,*

*A419 and Grove Lane offers an opportunity to provide a sustainable transport corridor through the development with a focus on sustainable travel modes, allowing the existing A38 to be retained as the main route for general traffic. This would support the Stroud Sustainable Transport Strategy and the Movement Corridors strategy.”*

61. Despite the contention in the PSU that there is a “*Interchange Hub*” for seamless multimodal integration, there are few details, detailed on the Emerging Concept Plan, as to what that Integrated Hub is. It is located within the area labelled as “*Employment & Potential Transport Interchange*.” The Interchange Hub may lead to additional local trips with traffic leaving the M5 junction 13 to access any public transport that may be provided towards Gloucester to the north potentially acting as a Park and Ride site on a strategic level.
62. Whilst the PSU at paragraph 4.14 indicates:  
*“The access strategy would also offer the potential to downgrade or even close Grove Lane to through traffic towards its western end. National Cycle Route 45 routes along Grove Lane in the vicinity of the Site and therefore this would significantly benefit cyclists on this section of NCR 45. It would also address local concerns regarding rat running along this route and the long standing highway safety concerns with the A38 / Grove Lane crossroads junction. Furthermore, it would allow the potential for Grove Lane to become part of a sustainable transport corridor, providing a key bus priority route to/from the A38 and Stonehouse, including Great Oldbury, West of Stonehouse Strategic Allocation, and Stroud.”*
63. The closure of Grove Lane to through traffic would displace that the traffic that currently routes along it from the A38 to the A419 avoiding the A38/A419 roundabout and M5 junction 13 onto the A38, and the A419.
64. This, even without any account of proposed allocation traffic, would impact upon the operation of both the A38 / A419 roundabout, and the M5 junction 13 roundabout.

## **Conclusions**

65. NPPF paragraph 108 indicates:  
*“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

- a) *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
  - b) *safe and suitable access to the site can be achieved for all users; and*
  - c) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*
66. There is no technical evidence to verify that such an allocation would have a safe and suitable access arrangement, or that it would be transport sustainably located or that there would not be a significant impact of the proposed allocation. The later point cannot be demonstrated by any dialogue that may have occurred with Highways England or Gloucestershire County Council.
67. Paragraph 109 indicates:  
*“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*
68. There is no technical evidence to verify that there would not be a significant impact of the proposed allocation. The point cannot be demonstrated by any dialogue that may have occurred with Highways England or Gloucestershire County Council.
69. NPPF paragraph 110 indicates that:  
*“within this context, applications for development should:*
- a) *give priority first to pedestrian and cycle movements, both within the scheme and with the neighbouring areas; and second – so far as possible - to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
  - b) *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
  - c) *create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists*

*and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*

- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

70. The proposed allocation would not enjoy a high level of accessibility for pedestrians, cyclists and public transport users, and that whilst suitable access could be achievable that there would be an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would be severe.

### **Overall Conclusion**

71. It is opined that the proposed allocation site, and the scale of the development flouts all of the principles expounded in the Local Plan Review, and the resultant Draft Local Plan. For the various reasons set out in this report, and that of MSP, the Parish Council on behalf of local residents object to the proposed allocation, both as an additional housing site, and as a reserve housing site.