

## **G2 Whaddon: Public Transport Strategy Commentary**

Stagecoach confirms that in addition to the material submitted to the Council by the promoters as part of the evidence base to the Local Plan Review, we have had separate discussions over a considerable period with the promoter's client team, to help identify and shape proposals for the development, such that they maximise the opportunity for the use of sustainable transport of all kinds, not only existing or potential future bus services.

Stagecoach is concerned that the share taken for sustainable modes is maximised, not least to ensure that added pressure on transport networks from development-related car-borne traffic does not seriously aggravate current and foreseeable congestion on the highway network across a broad area, further eroding our ability to provide reliable attractive journey options within an acceptable journey time.

The JCS area, adjoining which the proposed allocation sits, already suffers from serious and deteriorating issues arising from demands on the highways network at peak times exceeding practical capacity. These problems are growing in intensity and extent. St Barnabas junction between Stroud Road and the A38 Eastern Avenue, is a known significant focus of such difficulties. It is therefore essential that movement into the City from the site is accommodated in such a way that these problems are mitigated, rather than aggravated.

### **1. Development scope**

The allocation is for 2500 dwellings and 5 Ha of employment.

The allocation covers three separate main controls, of which the promoters control the bulk, but not the holdings adjoining and further north between Grange Road (the current edge of the built-up-area) and their site. A portion of the site within Gloucester City has been successfully brought forward for 250 dwellings by Persimmon Homes. A larger holding further east within Stroud District under the control of a third party, has always been considered part of the area under consideration for allocation.

The promoter of the southern site consider the land under their own control has scope to appropriately accommodate about 2400 dwellings; a figure that suggest that with adjoining parcels a substantially larger quantum could in theory be accommodated.

The largest promoted site includes land for single combined primary and secondary school. This is relatively unusual but has been implemented on sites of similar size elsewhere in England, not least Chafford Hundred in Essex.

The transport capacity issues at St Barnabas will need very careful mitigation under any scenario. There is an argument that the costs of this mitigation might be most appropriately and viably borne by allocating land across multiple controls for a higher quantum, if a suitable mitigation package robustly able to accommodate the demands arising could be agreed.

The all-through school and the Secondary phase in particular would greatly improve trip internalisation. However given the presence of Grammar Schools and denominational education in the City, and also in Stroud, this should not be over-estimated. The proposed Local Centre could

count on a significant exclusive hinterland. This is likely to support a larger range of local convenience retail and service businesses than a smaller scheme, especially if it is optimally sited. This would further obviate the need to leave the site's immediate vicinity to meet day-to-day needs.

There has been a great deal of work done over many years to understand the opportunities and the constraints on the site and accordingly, the indicative master plan now reached a relatively mature stage.

This site lies adjacent to the existing commercial bus network. Importantly the site directly benefits from the current half-hourly interurban service 63 corridor along and near its eastern boundary, providing direct links into both Gloucester City Centre and Stroud. It is also relatively close to the terminus of city service 9, running up to every 15 minutes. This means that with great care, and a suitable bus stop and turning facility being provided just within the site off Stroud Road, initial phases to the east could be reasonably well served from first occupation. However, successive phases distant from the Stroud Road will require a strategy to be developed that will demand great care. The fact that the demise does not afford a long boundary with Stroud Road is likely to mean that maximising the potential attractiveness of pedestrian and other rights of way to reach service 63 is essential.

Service 9 is already a relatively long and intricate urban route. Extending it is likely to be unjustifiable, especially if intervening land in third party control is not brought forward and integrated with the scheme. As it is, even then, the width of the street between the current Tuffley terminus and Grange Road, across which a direct link should be provided with no change of priority, is of a width that its use as a bus route is marginal.

## **2. Proposed Railway Station**

There has been an aspiration for a station in this area for many years, and was initially associated with Hunts Grove, west of the railway that forms the site's western boundary. We note that land for this station is reserved.

The station would notionally provide for an immediate hinterland numbering a very substantial number of homes both east and west of the line, including the whole of south Gloucester. Given it would notionally be expected to offer services towards Bristol, that are not available at Stonehouse or at Stroud stations, in the absence of a further new stop at Stonehouse Bristol Road, the station would also be likely to attract journeys originating in both. The difficulty then, is that a great deal of traffic could easily be attracted to the station by car, demanding substantial parking facilities, as well as creating serious pressures at peak times on the rail bridges, which at both Grange Road and Naas Lane, are somewhat substandard.

The promoter has set out plans to potentially extend bus services into the site via Naas Lane from the west, which might be considered to address some of this demand. However, the feasibility of this needs to be looked at very carefully indeed. To be practical and effective, it may be that the rail crossings at Naas Lane and Grange Road need to be dedicated to sustainable modes only. We note and welcome that the southern access towards Naas Lane is proposed for sustainable modes only but this may not be sufficient, given likely rising levels of local traffic seeking this route. However, this

then is likely to set up wider impacts on the local network arising from the impact on local connectivity.

Thus far, despite the policy backing and strong local aspirations, providing any new station facilities here and elsewhere in England related to large scale development has proven exceptionally difficult, especially when a longer-distance main line is involved as is the case here. For the reasons above, and looking at the wider constraints that hinder the delivery of such facilities, we would urge that the case to bring this land forward places no reliance on the delivery of this station.

### **3. Transport Strategy**

Given the challenges known to exist at St Barnabas, outside the District, and to a lesser extent on the northern approaches to Stroud, it is essential that the development arrive at a means to firstly create some capacity headroom at St Barnabas, and then ensures that any capacity released is not overwhelmed by traffic arising from the development. Whatever happens, the peak hour bus journey times through St Barnabas need as far as possible to be the same as they are off-peak, if the necessary bus route capacity is to be provided, and the choice offered is also to prove sufficiently attractive to be chosen over car use. Maximising the bus mode share from the site, to exceed anything that has to date been achieved in the JCS area, much less within Stroud, is highly likely to be a necessary precondition to bringing the site forward sustainably.

We do have some grounds to believe that this would be achievable, albeit challenging.

The key to maximise the bus mode share from the site would be to greatly enhance service frequency to at least every 20 minutes between the site and both Stroud and Gloucester if phase 1 lies off Stroud Road. If not, at first occupation, a similar frequency somehow needs to be delivered from Naas Lane. As the site builds out, a least a 10-minute frequency will be needed, simply to deliver enough capacity to accommodate a sufficiently high mode share. The precise trigger for this would need some analysis and discussion but is likely to be needed before the 800<sup>th</sup> occupation.

The journey time by bus must be competitive with the car especially at peak.

If a direct bus link is to be provided via Naas Lane to Waterwells to the west – and we agree that the proximity of this and other employment in the near vicinity is a major component of the site’s sustainability credentials – then this tends to beg a closure of Naas Lane to anything other than sustainable modes. Otherwise, the combination of local traffic with that with longer distance destinations, seeking to use the M5, is likely to overwhelm the local network over a quite large area.

The A4173 Stroud Road represents a corridor along which simple provision of bus lanes simply cannot be achieved. Therefore if buses to the north are not be subject to even more serious queuing and delay than today, an alternative, traffic-free route needs to be found, both for the 63, the existing 9 and any new or enhanced variations of service needed to serve the site. In practical terms this is most likely to involve some kind of re-purposing of the parallel street, Campden Road/Firwood Drive already used as a bus route, such that at its northern end it is used for sustainable modes only, at least at the busiest times, through the use of modal filtering. Signals, and a short stretch of bus lane along Eastern Avenue eastbound to St. Barnabas, looks likely to be achievable. In the opposite direction, the potential to create a bus lane southbound approaching the junction needs to be explored with very great care. Without corridor-wide bus priority measures to and from the City

centre, that can realistically achieve a more consistent and rapid journey time than today, and secure both the background 15% mode shift that the JCS transport evidence base separately assumed as well as a very high bus mode share from the development, the sustainability of the allocation would be very questionable.

#### **4. Urban Design**

Most of the extensive site extends further than 400m to the west of the A4173, providing the current closest bus route. Contrary to the impression given in the promotional material this service (63) is **not** amenable to diversion deeply into the site, as it performs an inter-urban function. However, a suitable stop just within the site allowing the service to quickly run in and out, probably associated with a local Inter-modal Interchange (see below) is supportable and can and should be pursued.

The spine road between Naas Lane and the A4173 must accommodate a high-quality bus corridor, for an extended or new service, or both. We note and welcome that the current indicative master plan does so, and that our prior input has been taken into account by the client team.

It is essential that a second bus route link is provided to and through the northern edge of the site, to allow a direct bus route through adjoining land running parallel to and west of the Stroud Road as far as Grange Road. This should be provided to the same standards as the main spine road, and conditions need to be agreed to ensure that this is built and made available to the same point either side of the boundary with a mutual connection clause, and without any intervening land in third party control preventing adoption of a through route across the boundary in the fullness of time. For the avoidance of doubt, this is to future-proof the optimum evolution of the bus network, and the promotion of only the southern control does not in our view demand the delivery of all the land south of Grange Road, though we do think this is likely to confer some significant advantages.

**We would nevertheless urge that in due course, at detailed design of these streets, all stakeholders carefully consider the design principles set out in our formal guidance document “Bus Services and New Residential Developments”.**

We support the Inter-modal Interchange on Stroud Road, to improve the effective catchment of the Stroud Road service (including for journeys to Stroud). Should the site justify the provision of a second, smaller local centre, we would expect it to be oriented towards the A4173, and co-location of this with the Interchange would strongly support this acting as a significant focal point for inter-modality. In addition to secure cycle parking, we would urge that the scope is identified to provide some dedicated parking spaces for “stop and drop” activity, whether by taxi or others, and which would serve to help facilitate future “last mile” services in the fullness of time.

Stagecoach is expecting to work closely with the promoters’ client team to refine and optimise the urban design approach taken and secure the wider benefits this site is likely to offer to provide effective bus advantage in the A4173/Stroud Road corridor between Gloucester, Tuffley and Stroud.

#### **5. Delivery and Deliverability**

The main promoter, Taylor Wimpey, has a demonstrable track record of building urban extensions at pace and scale. They have acquired the whole interest of 1450 units consented at Innsworth within

the JCS area, and two reserved matters applications have already been tabled even before primary infrastructure works had commenced. At Great Western Park in Didcot, Oxfordshire, annualised rates of in excess of 400 dwellings per annum have been sustained.

Once commenced, we would say that achieving the most rapid rate of development possible will be essential to justifying the large outflows of cash needed to install the entire length of spine road, and bus route, at as early a stage as possible. It will also support a rapid evolution of demand that both justifies and helps support the earliest provision of bus service frequency and capacity.

As well as the need for rapid pace, we would stress that robust consideration of phasing will be of the essence having regard to the effectiveness and practicality of sustainable transport delivery. It is essential we do not see a repeat of the experience at Hunts Grove, where initial phases were brought forward as far distant from existing services as was possible to be, compounded by the successive delays over many years, in facilitating access into the site for buses. We see a definite risk in this regard, that site-specific policy must address.

The Council in its housing trajectory at section 7.0 of the plan at table 6 does not include the site as it is not formally allocated and is currently seen as being hypothecated to meeting Gloucester's needs. This need already exists. We believe that the promoter could mobilise rapidly following any allocation and outline consent being issued, and this is well demonstrated at both Innsworth and also at Perrybrook, another of the JCS Strategic Allocations at Brockworth. We see no reason why an annualised rate of delivery of up to about 250 homes/annum is anticipated. Thus the development could, assuming a start in 2023 be substantially complete by about 2034.