

G1 South of Hardwicke, Hardwicke Court Estate (“Hardwicke Green”)

Stagecoach confirms that in addition to the material submitted by the promoters as part of the evidence base to the Local Plan Review, we have had ongoing discussions with the promoter and their client team, over a considerable period, 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.

Stagecoach has made consistent representations, including to the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Examination, signalling unequivocally that this site is among the very best placed options that have yet to be allocated, in terms of meeting Gloucester City’s ongoing development needs, in a location that maximises the use of walking, cycling and public transport. Extending the existing city bus operation is relatively straightforward. The site lies adjacent to the existing main Gloucester-Stonehouse-Stroud service 64 corridor, operating up to every 30 minutes, which we can envisage being further strengthened in line with current commitments and proposed and potential development West and North West of Stonehouse.

At least as relevant, there are further exceptional opportunities to create links and synergies with the very substantial employment cluster at Waterwells, and east and west of the A38 all-but adjacent to the site, as well as committed residential development at Hunts Grove, which is now delivering at pace, and the Hunts Grove Extension allocated as Land South of Haresfield Lane in the current adopted Local Plan. If growth on a strategic scale is not to make excessive demands on limited highways capacity, not last on the SRN and junction 12, an uncompromising focus must be made on maximising the use of sustainable modes, and public transport in particular.

1. Development scope

The proposed allocation is for 1200 dwellings, that lies south of Hardwicke and west of the A38. The historic settlement has a relatively intricate built form, but is dominated by clearly suburban form on land to the north. This includes an initial phase that could be provided in the shorter term immediately adjoining the eastern boundary and which would provide the initial length of spine road into the wider development. This has been subject to a recently withdrawn planning application for 175 dwellings on which Stagecoach has made separate representations and had direct supportive discussions with the promoters client team.

The proposals are evidently of a scale that would justify and sustain the local centre and primary school, which are proposed by the promoter. The proposed allocation will be able to take direct advantage of these facilities, as well as existing and proposed new employment immediately adjacent to the site. These could be made very readily accessible on foot or by cycle, and we would urge that these opportunities are forensically evaluated as part of the master planning exercise. However, major improvements to walking and cycling links, that would also allow bus services to

inter-operate between the site and other recent and committed large-scale developments are already being delivered in the immediate future as part of a major planned reconfiguration of the A38 overbridge and wider measures that are about to be constructed as part of the final phases of Hunts Grove.

The promoters consider the site has scope to appropriately accommodate a quantum of at least 1200 dwellings in total. Given the inherent sustainability credentials of the site, which is particularly well located with respect to the largest employment and service centres within the District, within reach of a station with mainline rail service without recourse to a car, and is already served by bus services on its northern and eastern margins, we would urge that the practical capacity of the site is made fullest use of. These credentials are well signposted by the site-specific template in the AECOM Sustainable Transport Strategy.

As discussed above, trip internalisation should be assessed in the round with the existing consent of Hunts Grove, and having regard to the adjacent employment at St Modwen Quedgeley West, as well as the very close proximity of employment at Waterwells.

There has been significant exploratory work already done to understand the opportunities and the constraints on the site and accordingly, the indicative master plan has evolved to a substantial extent to something that is reasonably definitive, demonstrating that the development is realistically achievable.

2. Longer distance travel demands: Hunts Grove Station and Waterwells

Stagecoach is aware of concerns expressed by Highways England regarding the potential impact of further developments in the area on the safe and reliable operation of the M5 at Junction 12. In particular, there are specific issues that have been identified with regard to the potential for queueing on the off-slips, extending back to block the mainline carriageways. Significant works have recently been completed at the Cross Keys Roundabout to increase the capacity of the junction allowing traffic existing the motorway at j12 to flush through at a higher rate downstream. This has been designed expressly to mitigate the problem. Our experience at the junctions indicate that it has significantly addressed the problems concerned for now, albeit, queueing in the morning and evening peaks on the B4008 northbound approaching the junction from the south is becoming an increasing issue.

We are aware that Highways England and a number of other stakeholders are looking closely at this problem to understand its causes, and establish the basis for appropriate mitigations.

Stagecoach experiences traffic conditions here and on the wider network every hour and every day. All our buses are equipped with Automatic Vehicle Location and we monitor delays as a matter of operational procedure. We are of the clear view that such problems as exist at junction 12 and on the immediate network are complex and involve the interaction of trip demands expressed at both local and much longer-distance scale; and clearly also reflect freight demands associated with a number of distribution and logistics operations based in the immediate area.

Certain outbound demands from residential development in the area are expressed south towards major employment in Stroud District, not least the large concentration of jobs at Stroudwater Business park near j 13, but also beyond towards the Bristol Northern Fringe. This is unsurprising

given the differential in house prices between Quedgeley and Bristol; and the fact that the journey time to Aztec West from this area, certainly in free-flowing conditions, can be as little as 30-35 minutes. Many car-borne journeys from eastern parts of Bristol to Aztec West at peak times would take greatly longer than this.

With no rail station on the Gloucester-Bristol Line south of the City apart from the very limited facility at Cam, there has long been an aspiration to provide a new station in the area at or around Hunts Grove. This has featured in successive Local Plans since 2006. However it seems no closer to be achieved now than then. The site would presumably be at Naas Lane on the far eastern edge of existing developments. It would require additional train paths to be achieved for local “stopping” services between Bristol and Cheltenham, potentially extending beyond to Ashchurch and into Worcestershire. While we understand there is a requirement to invest in re-signalling the line, and there are clear aspirations on the part of many bodies to effect a half-hourly stopping service between Gloucester and Bristol, we are not aware of any firm plans to realise this in the next Network Rail Control Period to 2029 (CP7). Plans for CP8 are not published. However strategic objectives for this corridor include improving longer-distance train paths, and increasing capacity for inter-regional movements, and these are likely to significantly constrain what capacity could be made available for more local services.

However a significant asset exists in the form of the Waterwells Park and Ride site. This is a substantial facility including 520 parking spaces, and a small terminal building. It is quite far out from the city centre and it has proven to be difficult to intercept sufficient volumes of those with central area destinations to make this viable on a standalone basis. Stagecoach West operates a service commercially every 20 minutes that seeks to provide as fast a journey as possible while combining the service with demands from intermediate origins at Kingsway and at Hempstead. It is accurate to say that the facility offers significant unused capacity.

Stagecoach West has been looking for some time at how this facility could be leveraged to help sustain a new form of express service to Bristol Northern Fringe. In 2014 we trialled such a service known as the “Belles Express” that served the site. It was not sustainable for a number of reasons, one of which was insufficient frequency, and lack of awareness among key employers in the Northern Fringe. Since that time, however, demand has significantly evolved. This includes the completion of Kingsway and the acceleration of development at Hunts Grove from a significant hiatus, to a sustained high rate. We also have established a market leading presence with local bus services in the Bristol Northern Fringe in the last two years. This has included direct relationships with many of the area’s largest employers. Accordingly, we are looking carefully at the scope to establish a relevant service that could attract a significant proportion of current travellers who today only realistically can drive along the M5.

Secondly, we have separately made clear to the Councils and to promoters, that we see further separate potential to greatly improve the relevance of bus and coach for more local inter-urban movements between Quedgeley and Stonehouse in particular. There are significant exchanges of population in the area at peak times. Some of this is associated with school and college traffic. We already operate up to three buses per hour south from Quedgeley, two to Stonehouse and one to Cam and Dursley. It is likely that we will be diverting the 64 to serve the A38 south of the Cross Keys roundabout (replacing the existing 64 along the B4008 through Standish with another service)

serving Whitminster and the Chipmans Platt roundabout before continuing through Great Oldbury. This will provide new direct links from Quedgeley close to the major employers in the area. These movements today can only be made by car.

These services, and any improvements to them, would pass the eastern site frontage. There is therefore a clear potential opportunity to secure high quality bus facilities on the A38 Bristol Road (also assisting Hunts Grove) and potentially incorporating cycle parking and some enhanced scope for safe pick up and set down, perhaps with short stay waiting bays, to facilitate convenient “last mile” access to and from such services, supplementing the Park and Ride.

3. Public Transport Strategy

The comments below elaborate upon our previous representations, including those made to the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy in 2015. They re-state the main relevant points, but also highlight more recent changes in circumstances.

The site is within immediate reach of existing service 12 at its north western edge which runs along Westland Road and Sellars Road. Existing pedestrian links past the Primary School site offer direct links to the service from the northern edge of the site. This is a core city service runs 7 days a week, and offers a frequent daytime service, supplemented with a half-hourly evening service until 2200 hours. It is nevertheless essential that the strategy to extend or otherwise amend this service fits into a wider strategy to improve bus frequencies, capacity, reliability and journey times that should cover the entire Central Severn Vale area, of which this is a part. While there is already some effective bus priority in the Quedgeley area, including around the Bristol Road junction with the A430/A38, there is scope to enhance this further, quite substantially. There is a substantial and worsening problem around the southern approaches to the City Centre around Southgate Street. This is clearly associated with car-borne movements associated with Gloucester Quays, and substantial residential and other development west of the Canal. It needs urgent attention.

The site is directly served by the 60 service (Gloucester-Whitminster-Cam/Dursley and the 64 Gloucester-Stonehouse-Stroud on its eastern edge along the A38 Bristol Road. Both routes can be expected to form, in some manner, a part of a very substantial service upgrade necessary to transform the attractiveness of the bus to meet longer-distance movement and support the sustainable delivery of the Local Plan Strategy. It would not be appropriate to divert these services into the site. However, as we state above, the greatest attention should be paid to the siting and nature of bus stop infrastructure on the Bristol Road, with a view to facilitating access to them from within the site and a rather broader hinterland, not just by walking, but by cycling and other modes.

It is also likely that a pair of enhanced stops on the A38 would also be used by any express service we initiated towards the Bristol area.

The spine road through the site does need to be engineered to accommodate a bus route between Sellars Road and the A38 Stagecoach West confirms that it intends to use this route for a frequent service in due course. It would be advantageous to ensure that it is delivered and available for a through service when more than 50 occupations take place more than 500m from stops provided that are used by the existing services 12/64.

It is worth making clear that it is our hope to initiate an extension of our service 8 beyond the Waterwells Park and Ride site to serve Hunts Grove, later this year. This will, initially, terminate at a temporary turning circle within the development. However, before long, it will be necessary to continue the route through to the A38 junction and beyond, as there is no specific provision to turn the bus within the site. The most efficient place to turn would be to pass the eastern part of the site using the A38 northbound off-slip, to then turn right and use the overbridge to return to Hunts Grove. This would provide a direct link from the initial likely phases to all parts of Waterwells, which extends a good distance away to the east of the A38, and well beyond comfortable walking distance.

The existing Local Plan Allocation “Land South of Haresfield Lane”, also known as the Hunts Grove extension, is likely to provide a loop road allowing a bus service to terminate within it. The additional 750 dwellings, plus evolution of wider demand, ought to support an increase in frequency on the Hunts Grove service to at least every 15 minutes. However, it may prove at least as advantageous to continue to operate the Hunts Grove service beyond the A38 access at the stage that this loop is available, to maximise the connectivity and potential hinterland available to the service, including the eastern end of Hardwicke Green.

4. Urban Design

Stagecoach confirms that it is already confident that the spine road indicatively shown on the material in support of the Consultation reflects a suitable and reasonably optimal bus routing, given the development context and the site constraints. It should be assumed that buses will route in both directions through the site, with bus stops provided on both sides of the spine road. It is likely that city-bound buses will route towards the west towards Sellars Road; however, this is far from certain. Bus stop sites should be therefore considered that could allow for appropriate installation of shelters on either side of the road.

It may prove advantageous to alter the alignment such that the route ties in to Church Lane a little further south if possible, to bring more plots west of that into convenient reach of stops.

We would urge that in terms of detailed design of the spine road, the fullest consideration is given to our comprehensive guidance document “Bus Services and New Residential Developments”. We would also recommend that treatment of frontages along this route is sympathetic to the regular passage of large vehicles, and higher levels of movement than most residential streets. We would also advise that it is quite possible peak capacity requirements will warrant the use of double deck vehicles in time. This being the case it is especially important that on-carriageway parking is minimised, that frontages are set back at least 6m from the kerblines, and ideally, that direct frontage access is limited to shared private drives only.

We refer above to the need to be especially careful to identify any opportunities to deliver a pair of enhanced bus/coach stops serving among other things, longer-distance inter-urban services, running along Bristol Road. These should provide the opportunity to draw from a wider hinterland within the site, and, indeed from Hunts Grove and the southern part of Quedgeley. Facilities to access these stops by cycle, including secure cycle parking, are likely to be highly relevant, along with the scope to safely stop, and wait to set down or pick up passengers by car or taxi. For this reason the site for these might profit greatly from being directly associated with a local centre, should it be considered appropriate to site this near the eastern part of the development.

Opportunities to maximise the attractiveness of walking and cycling within the site will support the highest levels of public transport use. We also would urge the greatest possible care to be taken to make walking and cycling attractive options to nearby an adjacent employment sites, to minimise the need to drive for local journeys, especially at peak times.

5. Delivery and deliverability

We note that the site is in a single control of a national housebuilder of good repute. It is also clear that the site could make a contribution early in the Plan period. This is well evidenced by the recent completion of a development that formed part of the Estate at Sellars Bridge; and the recent application for a first phase, that shows that all technical disciplines have been addressed allowing an initial phase to come forward.

The developer assumes that about 120 dwellings per annum would be delivered from this site over a 10-year period. This aligns with the assumptions in the Council's own trajectory at Section 7.0 of the Draft Plan. It ought in our view, to advance completions to begin sooner than 2025-26; and equally we would urge that development progresses expeditiously once commenced, in order to avoid a situation where significant numbers of properties are occupied deep within the development for any period of time, before a bus route can be offered within convenient distance. In this connection we suggest that trigger should be set that no more than 50 dwellings shall be occupied lying more than 500m from existing or future bus stops on Bristol Road and Sellars Road/Westland Road, before the spine road is completed and made continuously available thereafter to bus services.

While we trust that the exceptional opportunities this site offers for proportionate contributions to pump-prime further bus service improvements will nevertheless be required. There would be a number of possible strategies and supporting mechanisms to effect this and we need to discuss the optimum solution to effect the best possible outcomes in line with the mobilisation of development at a suitably early stage, while also avoiding excessive costs being incurred prematurely, or inappropriately and unduly burdening the development. However, we can point to the success of the direct procurement approach by the developer at Great Oldbury, Stonehouse.

In particular, assessment of the appropriate scalable and phased delivery of new and improved services, which are likely to involve both improved links towards the north and contributions to catalyse improvements to southbound services, needs to be agreed.