

## Land at Grove Farm, and East of the A38, Whitminster

### 1. Introduction and background

As our core representations make clear, Stagecoach is most concerned that the Local Plan spatial strategy is formulated in such a way that pressure on the highways network is minimised, and the share taken by sustainable modes in meeting existing and future mobility needs is maximised. Quite apart from this being entirely in line with the Strategic Objectives, to reduce emissions and other pollution, and support healthier lifestyles and social inclusion, it is at least as important 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.

We have signalled, clearly and consistently throughout the evolution of the Local Plan Review strategy, that we recognise the following key issues:

- Physical and other landscape constraints make it practically impossible for the largest settlements of Stroud and Dursley to grow
- There is significant and growing pressure on both local and national strategic highways capacity, while the connectivity, capacity, frequency and availability of public transport options, both road-based and rail, is quite limited.
- There is a need to ensure that the current patterns of longer-distance out-commuting by car are contained and reversed.
- This arises to a great extent from development pressures arising from both Gloucester in the north and the West of England/Greater Bristol in the south, to a great extent arising from house price differentials.

The above factors, signalled clearly by the Council themselves in their previous and current consultations, when looked at in the context of Chapter 9 of the National Planning Policy Framework, beg a spatial strategy that locates development as close as possible to employment and service centres, while, as far as possible, ensuring that radically more attractive public transport options are available to meet these travel demands.

The spatial architecture of such a strategy is picked up quite clearly in the evidence base for the Plan, published in support of this second Regulation 18 Preferred Strategy consultation. In reality, existing and future patterns of movements are clearly related to a very limited number of corridors, reflecting the very strong physical attributes of the District and spatial distribution of population and movement that arises from that. These are picked up very clearly in the County Council's Draft Review of the Local Transport Plan, and in the Council's own Draft Sustainable Transport Strategy, in which they are referred to as Sustainable Movement Corridors (SMC). There is a single north-south SMC in the Vale beneath the Cotswold scarp, with two (and in our view three) branches that run to the east up the main valleys to the key market and former industrial centres in the valleys. This is represented well in Figure 1 of the Sustainable Transport Strategy.

It must be stressed, as we do in our main representations, that there is neither a sound logic nor functional relevance in trying to create mass transit mode improvements that do not align with

these corridors. In the Stroud context - where current service frequencies are relatively low even on the core routes - it is even more vital to focus attention on building these corridor up to a point where service frequency, directness and reliability makes public transport use highly competitive with car use. Trying to create what in effect would be entirely new corridors or branches, that do not align with existing movement corridors is an exercise doomed to failure.

We are encouraged that many of our own prior comments have been picked up and explicitly quoted in this evidence base, most notably the STS, published with this round of consultation. The document among other things usefully summarises the existing and emerging County Council transport priorities and projects for delivery in support of them.

Arising from this evidence, and our own understanding of how the most relevant and effective public transport can be secured gained locally and nationally over many years, we made clear to the Council that, after the capacity to accommodate development rationally and sustainably in the Cam and Stonehouse areas had been reached, which are closest to existing centres of population and services, one or more new settlements or expanded villages were likely to be required. These would be most sustainably located on the A38, where good public transport connectivity could be provided, also serving to substantially boost the quality and relevance of bus services to the existing population.

We also pointed out that as a former trunk road, there was a good deal of scope within the existing public highway, and to a great extent within the current carriageway pavement, to provide bus priority measures on the A38. This has separately been identified and acknowledged by the Sustainable Transport Strategy at section 4, with This then leads to the parallel conclusion drawn at Section 5 that on the character and nature of the A38, *“lends itself to providing express movements for public transport, with relatively few stops focused on points where people from nearby settlements access the A38. Investment should therefore be focused on direct services at high frequency which can compete with private car usage in terms of journey times and flexibility. The approach to this corridor should ensure that surrounding settlements, such as Whitminster, Eastington and Berkeley, can access these express services by sustainable modes if possible and ensure that they do not compromise the express nature of the service.”* We unequivocally endorse this conclusion.

## **2. Whitminster and its location**

Whitminster is one of the few significant settlements on the A38, though the village itself is located largely off-line to the west. The Council places this settlement as one of the few in the third tier (3a), in the refreshed categorisation set out in the Draft Local Plan and evidenced by the Council’s Settlement Role and Function Study Update (2018).

There is already a quite explicit recognition by the Council that Tier 3a settlements outside the AONB and Green Belt are likely to represent some of the most appropriate potential growth locations, once the scope for sustainable development at higher tier settlements is fully exhausted. This is set out fully in support of Core Policy CP3, as follows:

*“These medium-sized and large villages are generally well-connected and accessible places, which provide a good range of local services and facilities for their communities. These villages benefit from*

*their proximity and/or connectivity to higher tier settlements or transport corridors, which enables access to employment and key services and facilities elsewhere, and which may offer some scope for further transport and accessibility improvements. These are relatively sustainable locations for development, offering the best opportunities outside the District's Main Settlements and Local Service Centres for greater self containment.*

*Some of these settlements outside the AONB may have scope to help meet the housing needs of more constrained Tier 1 or Tier 2 settlements."*

It is the first such encountered south of Gloucester, including the existing and committed new employment found at Quedgeley on or close to the A38 Sustainable Movement Corridor. This means that, beyond the edge of Gloucester, the distances involved in travelling to employment, services and amenities both to the north and south can be minimised, compared with almost any other option, or, for that matter, almost any other Tier 3a settlement.

It has to be admitted that the public transport options on this part of the A38 SMC today are very limited. However, as we have stated in a number of places elsewhere, this is about to change. The main link between Gloucester and Stonehouse is to be diverted to this corridor. Service 64 will provide, as a minimum, a 30 minute core frequency between Gloucester, Quedgeley, Stonehouse and Stroud, via Whitminster.

This revised core corridor which is acknowledged in the STS, will be highly amenable to further enhancement as that Strategy requires, even before new express bus services are considered running along the A38 and/or M5 towards the south. This is because the Preferred Strategy of the Local Plan envisages consolidating a substantial amount of further growth along this route corridor. This includes proposed Strategic Allocations to the north, at Hardwicke Green, consolidating committed development underway at Hunts Grove and at the former RAF Quedgeley sites for employment; and to the south east with Strategic Allocations for employment East of the M5; and for residential development at North West Stonehouse.

We separately identified and picked up on the potential role of M5 junction 13 in facilitating interchange between local movements with longer-distance express coach services, subject to suitable interchange facilities being provided close to the junction. This has also been identified by the Council's STS, which identifies, under the initiatives that should be progressed under the STS Corridor Strategy *"Express bus services between Stroud and Bristol, **potentially with an interchange point in the vicinity of the M5 Junction 13.** This will provide attractive bus service linkages between the two destinations via a combination of the bus corridor packages and interchange strategy which form part of this STS."* (p 23). This could be provided either east or west of the M4, of course. Indeed, east of the M5 we have been in detailed discussions with the promoter of the EcoPark and new FGRFC Stadium, the potential to set up the car parks and the bus/coach stands to facilitate exactly this, when home matches are not being played, though this does not form an explicit part of the current proposals that the Council resolved to grant on 20<sup>th</sup> December 2019. Equally, it could be provided to the west, south of Whitminster.

Finally, the nature and character of the former trunk road does not present an attractive aspect or approach to the village, and severs some existing facilities from the existing village. The road also has its own adverse environmental impact on the amenity of the eastern flank of the settlement. With

the considered siting and urban design of an appropriate level of development, it may well provide possible to address all these problems. This could involve diversion of the vast majority of traffic well away from the existing village, towards the east.

It is for all these reasons that we suggested that opportunities might exist in the vicinity of Whitminster, to accommodate the development requirements of the District.

### **3. Land at Grove Farm and East of Whitminster**

We have been informed that Robert Hitchins Ltd. has presented information to the Council that indicates that it can deliver development on a range of scales, and incorporating appropriate infrastructure and complementary uses, on land north of the A419 (Grove Farm) and East of the A38, near Whitminster, directly on the confluence of the two main Sustainable Movement Corridors: the A38 and the A419/B4008.

The holdings under control are quite extensive and allow for a great deal of flexibility in what is developed, the disposition of land uses, and infrastructure, which presents a very helpful set of circumstances to identify and secure the most appropriate and sustainable form of development.

However, at this time, land flanking the A419 to the north, west of M5 junction 13, is proposed for 13.4 Ha employment-led development potentially including a bus/coach local interchange; and north of a landscape belt following the topography, a residential development of about 750 dwellings south of Grove Lane. Land is also under control North of Grove Lane offering a more extensive tract that could offer scope for about 1500 further dwellings and making further provision for services and community facilities. This could include a local centre sited between the existing village and the new population, and creating a significant new focus for the existing community as well as the new one.

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 been involved in very initial discussions with the promoter and their client team, in the last few weeks, to help identify the constraints and scope to maximise the opportunity for the use of sustainable transport of all kinds, and in particular the potential for a future strategic bus service corridor already identified in the STS as a key intervention, to maximise its effectiveness.

Consolidating a pattern of development in a series of locations, relatively close to one another and all linked by a single, logical and frequent high quality public transport corridor, is the only credible means of delivering a transformative impact to the public transport offer in this and the wider area. It is also entirely congruent with the evidence base and the wider development strategy for the District – much more so than the proposed allocations at Sharpness/Newtown.

It is clear that the land under promotion would be highly likely to deliver and secure the full range of policy aspirations for sustainable transport set out both in the County Council's Local Transport Plan and the District's Draft Local Plan Preferred Strategy as far as they relate to the A38 corridor and the immediate area between Quedgeley and Stonehouse. These include:

- ✓ Use of modal filters onto the A38 benefit sustainable travel modes.
- ✓ Rapid bus/coach services to key destinations such as Bristol

- ✓ Improved frequencies of bus services,
- ✓ improvements in bus stop infrastructure
- ✓ where appropriate, bus priority (including virtual bus priority either on- or off-line the existing A38)
- ✓ Northern Metrobus extension (seamless bus priority measures up A38)
- ✓ Safety improvements for pedestrians and cyclists at Cross Keys Roundabout

The proposals are extremely well-placed to align with other interventions related to the Stonehouse cluster, and the Gloucester Fringe, with which the transport strategy naturally would synergise.

These include:

- ✓ Improved frequencies of bus services on A419/B4008 between Stroud, Stonehouse and Gloucester, including improvements in bus stop infrastructure, and where appropriate, bus priority
- ✓ A419 corridor – Chipman’s Platt Roundabout upgrade

Moreover, west of Chipman’s Platt, a bus priority route would tend to draw together any divergence of the main services between the Great Oldbury Spine Road and the A419 into a single corridor, and at the same time create a natural interchange point between these more local service and any long-distance express services using either the A38, M5 or both.

#### **4. Urban Structure and Public Transport Strategy**

The key opportunity arises from creating a node offering efficient and as close to seamless interchange as possible between the two Sustainable Mobility Corridors. The first is the N-S corridor offered by the A38 bus priority spine - and the M5 providing for longer-distance coach movements. The second forming the eastern arm of the movement strategy in the wider area, is the A419 – B4008 corridor linking to Stonehouse and Stroud on the other. Because this location west of the M5 would also be served by any direct services between Gloucester, Wisloe, Cam/Draycott and Dursley, it is practically the only site where all these service could come together without one at least having to make a very substantial diversion.

We offer at this stage, the following broad observations and advice:

- The opportunity for express coach interchange to a range of long distance destinations via the M5 can only be secured if the coaches can leave and re-enter the motorway with minimal diversion. This suggests an interchange is best located towards the junction, and no further west than the indicative access point off the A419 mid-way between J13 and the A38 roundabout. A separate coach access directly on and off the junction, with buses serving a separate route and touching the interchange from the west, might also be very worthwhile, maximising the likelihood that long distance services such as Megabus would be attracted to the facility.
- Grove Lane in whole or in part (west of the M5 overbridge) would allow buses to fully serve the southern part of the site, and potentially bypass the A38 roundabout. The use of this as a bus priority spine should be carefully evaluated. A bus-only gate (modal filter) to prevent rat-running is likely to be a very worthwhile focus of consideration.

- The creation of a new route for bus and coach east of the existing A38 could represent a means of delivering additional seamless bus priority, especially if general traffic were to remain on the existing route. The scale and footprint of development taken forward will greatly influence how far this is achievable or optimal. If it is done, care should be taken to avoid the existing settlement being left greatly further from stops than today, which suggests that drawing a route in behind the existing Old Forge Inn closer to the current A38 line might be expedient.
- The character of such a route, balancing carefully the movement and place function, could follow some of the approach recently taken at Wokingham Berkshire (Northern and Southern Distributor Roads)
- Alternatively, the A38 might be retained as the main route for general traffic, while a parallel bus and coach spine could be created possibly using modal filtering while allowing swift seamless through movements for bus and coach.
- Much depends on how far the development form would seek to integrate with the existing village, or “turn its back” on it. These are very significant questions that ultimately depend on the final view arrived at after a great deal of future discussion, of what the relative merits are of retaining the existing character of the village as it is, or seeking to enhance it through carefully planned integration across the existing A38 line.
- If it is considered that creating a new route for the A38 to the east, through the site, is appropriate, this could allow the existing A38 to be re-purposed, in part at least, as a sustainable modes priority corridor, with elements of the design approach taken at Monkton Heathfield, Somerset, being worth careful consideration and application as appropriate. Here the old A38 is now downgraded to act as a direct bus route through the enlarged community, with the new local centre and primary school directly sited on it to offer a community focus unencumbered by through traffic.
- Bus priority on the A38 to the north, to and through Cross Keys at Hardwicke and linking seamlessly to measures to be provided within Gloucester in the Joint Core Strategy area, will be vital to securing the overall effectiveness of the wider public transport strategy needed to support the Plan as currently envisaged. Should land at Whitminster be included in the Plan, this can and should make a proportionate contribution to securing this objective.