

## **Stroud District Local Plan Review**

### **Regulation 18 Preferred Strategy - Stagecoach West Response**

#### **1. Introduction**

Stagecoach West welcomes the further opportunity to formally examine and comment further on the emerging proposals for the longer-term planning of the District. We applaud the decision of the District Council to undertake a second Regulation 18 consultation, allowing further work to be presented in support of the emerging development strategy and the resulting proposed allocations, and allowing appropriate opportunity for this to be scrutinised and tested by a full range of interested parties.

We understand that the stated purpose of this round of consultation is to help the Council and a wider range of Statutory Consultees to collectively understand how far:-

- *How far the community and key stakeholders support the Council's preferred strategy for meeting Stroud District's future growth and development needs.*
- *What additional issues or constraints exist relating to the proposed sites, and how specific constraints, needs and opportunities should be reflected in the final site allocation policies.*
- *What further changes to the proposed policies are considered necessary, including specific things that should be included in supporting text.*

Our comments are thus advanced in two broad sections: a commentary on the Plan and its key supporting evidence base; and site-specific comments and observations.

Our site specific responses relate principally to the sites proposed for allocation. We strongly support the vast majority of the options that the Council has identified. Our observations are aimed at giving both the Council and a wider range of stakeholders, more confidence that we see a way in which the step change in public transport quality and attractiveness can be achieved, not just to the proposed allocations in question, but better serving the entire plan area.

However, given the depth of the concerns we continue to raise with regard to Sharpness Vale - the largest and most technically ambitious allocation in the Plan by a considerable margin - we also advance some considered views on two areas we had highlighted at Issues and Options stage, where we continue to believe that clear potential is likely to exist for sustainable development to be delivered, that aligns much better with the Council's overarching spatial strategy, and are likely to much better address the challenges that are driving the Plan's Strategic Objectives. We now are aware that sites in both areas are available, and under active promotion.

#### **2. Structure of the Plan- Strategic policies**

Stagecoach recognises and applauds the level of diligence that has been applied to plan-making, both in terms of the process of plan-making, the approach to the evidence base, and to the content of the draft plan. This in most respects materially exceeds the time and effort that other authorities have generally made.

The Draft Plan is unusually comprehensive goes into a great deal of detail, and unusually, sets out policy in at least three "tiers" of detail, even before one considers the articulation of Strategic

Challenges and Objectives, and the general development management policies. Much of this can and should be viewed as a welcome and thoughtful response to the particular nature of the challenges and opportunities facing the Council. This is reflected in a number of distinct policy approaches within the draft plan.

The focus on settlement clusters demonstrates a very sympathetic and at times quite nuanced approach to the different needs and characters of sub-areas within the plan.

The approach to creating flexibility for smaller scale growth in certain villages is a carefully considered one, and is a good example of the care taken by officers, as is the exemplary approach to other areas, such as self-build and community led development.

Notably, all allocations are treated in the same depth of detail, whether they involve 11 dwellings or up to 5000.

However the result is a very long document that in many ways is hard to follow, with relevant policies, particularly with regard to the development strategy and development allocations of a strategic scale, divorced from one another and from a clear spatial narrative and justification. As the plan approaches examination, we think it would be very useful and helpful to all stakeholders to pull together the strategic narrative and policies with the policies for strategic allocations, at least for sites over 150 units scope. This will help make much more evident how strategic allocations follow from the spatial vision and strategy, and effectively address the challenges in the District.

The National Planning Policy Framework makes explicit that plans should be “succinct”<sup>1</sup>. It goes on to require that they should “avoid unnecessary duplication of policies that apply to a particular area”<sup>2</sup>. Strategic policies should be clearly signalled in a plan: “Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed”<sup>3</sup>. These starting points do not always follow through to subsequent site specific policies. It goes on to say in footnote 13 that “Where a single local plan is prepared the non-strategic policies should be clearly distinguished from the strategic policies.” That is the situation in this case.

While we are less concerned that what is set out in the plan is spurious, we wonder if the structure of the plan might be carefully looked at to rationalise it significantly, in particular where the “settlement cluster” approach is used. This along with non-strategic allocations could be better placed towards the back of the plan. We wonder if allocations for fewer than 25 dwellings are appropriate at all, given the strategic policy suite, which would appear to provide clear and sufficient policy support for these, and indeed the basis for some other smaller unidentified sites to come forward, especially in Tier 3a-c settlements.

### **3. The Evidence Base for the Plan and its Development Strategy**

#### ***3.1. The justification for the development strategy: an overview***

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<sup>1</sup> NPPF 2019 paragraph 15

<sup>2</sup> NPPF 2019 paragraph 16 f)

<sup>3</sup> NPPF 2019 paragraph 21

We see that a great deal of further evidence has been advanced in support of the Plan, much of it in draft form. This, very importantly, includes the Draft Sustainability Appraisal of November 2019 prepared by LUC (SA 2019). From our perspective, the transport evidence base has been significantly broadened with the Draft Sustainable Transport Strategy.

We welcome this level of transparency, allowing some clear scrutiny before the pre-submission version is consulted upon.

We are aware that that Sustainability Appraisal is a statutory requirement under UK law, and an analogous process of slightly different scope is also required by EU law under the Strategic Environmental Appraisal Directive, which will separately be transposed into UK legislation as part of the process of leaving the EU. In line with guidance within NPPF, we note that the Council is satisfying both legal requirements together in the Sustainability Appraisal in support of the draft plan.

Too often, we find that Sustainability Appraisal work, and other key elements of the evidence base, are used to retroactively justify a development strategy that is driven by more narrow political concerns than the principles of sustainable development, not least those principles set out in NPPF. In these cases, the SA methodology and the evidence set out the Sustainability Appraisal and elsewhere is contrived and distorted, to retroactively justify a pre-determined approach to strategic allocations. This is entirely contrary to the purpose of preparing Sustainability Appraisals set out in statute in the 2004 Planning and Compensation Act, usefully quoted in paragraph 1.13 of the SA.

As the preparation of the West of England Joint Spatial Plan (JSP), and its subsequent Examination in Public made plain last Summer, this kind of approach cannot be legally compliant and therefore cannot be accepted by the Planning Inspectorate, despite the clear and public ministerial guidance issued in July 2019, that Inspectors should take a suitably “pragmatic” approach to examining plans. Stagecoach made plain its alarm that the SA advanced in support of the JSP was inconsistent, and the weighting given to transport-related issues in particular seemed to be so low. A consistent, robust and appropriately balanced evaluation of the reasonable options for development is essential, to give all stakeholders confidence that the outcomes of the plan, if delivered, support and serve to “maximise” the opportunities for the delivery of sustainable development, and do not undermine it. In particular, the SA process should show how the plan strategy and spatial approach can demonstrably address the transport-related Strategic Challenges and Objectives of the plan.

### ***3.2. The Transport Challenges in Stroud District***

The challenges facing the District relating to transport are very plain from the supporting material, not least within Chapter 3 of the SA Final Report, but also in other key parts of the evidence base. This includes both the Sustainable Transport Strategy (STS) published in November 2019 in support of the Plan, and the Settlement Role and Function Study Update (SRFSU) published in May 2019.

These include:

- Exceptionally high levels of car ownership and use, with some of the UK’s highest levels of multiple car ownership per household in the UK
- Very high levels of out-commuting from the District: over 50% of journeys to work

- An average journey to work of 17 km: well above that which can be substituted by walking or cycling, especially given the challenging topography within and surrounding most of the largest settlements
- A relatively limited public transport offer, and low peak time bus mode share: 2% for journey to work, half that of the County as a whole and greatly less than the UK average of about 7% in 2011.
- Serious current and incipient capacity pressure on key highways and junctions, not least on the SRN at junction 12 and 13 within the District; and junction 14 a short distance beyond it.

The results for the preferred strategic allocations, and other omission sites, are presented in Chapter 5 of the SA. The detailed matrices are set out in Appendix 7.

In essence, Stagecoach is quite concerned that the SA methodology and the supporting evidence elsewhere, is apparently set up at the outset, to “elide out” the very considerable variation exhibited between settlements, and indeed sites, regarding their ability to meet their own residents needs on the one hand, thus reducing the need to travel; and the degree of ease that residents can reach services and facilities beyond the settlement. We discuss the reasons for this concern in more detail in the sub-sections following.

### ***3.3. Transport Evidence Base and Sustainable Transport Strategy***

As we have already commented on within our response to the previous Emerging Strategy Consultation, Stagecoach unequivocally welcomes that the Council has taken steps to establish a proportionate and relevant transport evidence base to the Plan. It is essential, if sustainable development is to be achieved, that the opportunities for sustainable transport are comprehensively and robustly identified, and fully taken up. This requires that transport issues are considered “from the *“earliest possible stage”* as stated by paragraph 102 of NPPF 2019.

As well as our formal input to the previous consultations, we are happy to confirm that we participated in Summer 2019 in a single transport workshop event in support of the Plan with other stakeholders, including the County Council. This afternoon session allowed us to reinforce some of the points we had already made in writing. We note, too, that many of our previous written comments to the Emerging Strategy Consultation have explicitly been picked up in the Sustainable Transport Strategy Report (STS) published with this round of consultation in November 2019, on which we comment later.

The STS summarises the key movement corridors, and the opportunities and challenges to sustainably accommodate foreseen demands for movement arising from the Plan strategy. The STS seeks to draw together a very wide range of other sources of evidence, including the policies and strategies of a wide range of stakeholders.

Most significant of these is the County Council’s Local Transport Plan. This is currently under review, and formal consultation with the public started on 16<sup>th</sup> January, shortly before this consultation closes. This very short window makes it very challenging to fully distil its contents and the relevant issues with respect to the Stroud District Local Plan Review.

The LTP Review is a substantial one, and as a result much of the material drawn into the published STS from the adopted LTP is therefore subject to change. We note the County Councils comments

that *“The review strengthens the climate change agenda and reflects adopted (sic) Local Plans and their infrastructure requirements. It recognises the link between the newly introduced Local Cycling and Walking Infrastructure Plans (LCWIP). And the LTP Review looks towards a new time horizon, to 2041, to discuss future transport technologies and likely growth scenarios.”*

We will separately be commenting on the new Draft LTP4, covering the period to 2041 aligning with this LTP period. Like the current LTP, it comprises an overarching policy suite, supported by mode-specific thematic policies related to each mode. Then, further locally-focused “Connecting Places Strategies” apply these policy objectives at a more local level, having regard to the spatial and geographic distinctives of portions of the County. Stroud District is mainly covered by CPS5, the Severn Vale, but the functional interaction with the Central Severn Vale – the JCS area – means that CPS1 is at least as relevant to the Stroud Local Plan, not least to those parts of the northern fringe of the District that interface with Gloucester City.

**It is absolutely essential that the Local Plan Review responds to the Draft LTP and transport evidence base, rather than the transport policies and initiatives being conceived retroactively to respond to Local Plan strategy that places little or no weight on transport matters in its formulation.**

Historically, the County Council explicitly took the approach that it would seek to “retrofit” transport solutions to Local Plan Strategies, without regard to cost or deliverability. This highly controversial approach was taken most egregiously in the case of the JCS, with the result that an extreme version of “predict and provide” was the approach taken to setting up the transport evidence in support of the JCS, with the actual scale and distribution of forecast traffic demands being such that even definition of actual mitigations, much less an assessment of their feasibility, effectiveness and costs, were extremely weakly articulated then and even now remain quite elusive. Indeed, the Council at the time made clear at the Examination in Public that it would not commit to delivering any of the packages broadly identified: it was “a package of transport intervention that – if deliverable - could be said on the basis of the modelling arithmetic to mitigate the traffic impacts of the JCS”, not one that would.

Stagecoach is clear that such an approach cannot be considered appropriate, nor can it present a sound basis for underpinning the Stroud Local Plan Review.

Very happily, the new LTP does not represent a crude rolling forward of the policies and approaches pertaining to date. In its foreword, the Draft LTP clearly states among other things, that *“Transport, and the decisions all of us make about how and why we travel, is key to reducing our CO2 impact. Gloucestershire recognises the urgency of this issue; the County Council declared a 'climate emergency' in 2019. In the light of this the LTP has developed new policy areas and strengthened target P1-14 - Reduce per capita transport carbon emissions. This LTP review has considered how to move towards a more sustainable transport delivery model. The plan seeks to optimise the existing transport network to full capacity, and recognises that we cannot build our way out of projected traffic growth.”*

It goes on to conclude in paragraph 2.3 ***“With expected traffic growth and the traffic generated by Gloucestershire’s growth ambitions Gloucestershire’s future productivity could be significantly impacted if steps are not taken to improve the efficiency of the overall mobility offer in***

**Gloucestershire.**” While noting that key highways project such as the A417 Missing Link and M5 j10 are still important priorities, for which funding has now been secured, paragraph 2.4 continues *“the significant growth expected in Gloucestershire up to 2031 and the emergence of equally ambitious growth ambitions beyond 2031, **simply trying to increase highway network capacity will be neither possible nor affordable.** More innovative solutions need to be found that optimise all transport modes serving Gloucestershire.”* In para 3.5 it then states: *“Ensuring that the existing infrastructure is used to its maximum efficiency will be at the core of the future of mobility in the County. **This can only be achieved through a significant mode shift from the private car to public transport and active forms of travel.**”* (Our emphasis).

The role of transport in supporting a lower-carbon future model of transport delivery, alongside a spatial pattern of development that is focused on sustainable movement corridors, is set out plainly at the start of Section 4 of the Draft LTP, which covers the planned growth of the County that will be identifiable in Local Plans. The emerging new LTP policy makes plain that the County as Local Transport Authority considers that *“**new development should be allocated and supported at sustainable locations, with easy and cost effective access to public transport and a high propensity to walk and cycle. Development patterns that reduce the need to travel long distances and encourage active travel modes are an essential element of sustainable development.** The location and nature of all new development, commercial and residential, has a major bearing on both the need to travel and how people choose to travel. **New development offers both a challenge and opportunity to improve local transport networks, better mobility for non-car users and active travel practices by overcoming barriers and improving connectivity, whilst taking due regard for vulnerable users and compliance with the Equality Act.**”* (paragraph 4.1.6)

We could not agree more, as the corpus of these representations ought to make abundantly clear. This stands in stark contrast to the explicitly “transport agnostic” approach to planning for the transport demands of new development that was taken by the County Council until recently.

It continues: *“Failure to manage travel whilst encouraging development will result in worsening and expansion of (the extent impacts of traffic volumes on) existing congested networks, if appropriate levels of mitigation are not secured.”* (para 4.1.7) **The concerns that Stagecoach has regarding the formulation and delivery of the Local Plan strategy largely arise from exactly this threat,** given the exceptionally damaging effects of congestion of public transport productivity, attractiveness and effectiveness.

Simply put, the transport policy approach and strategy adopted to support the last round of Local Plans in the County is no longer considered appropriate. We heartily welcome this recognition, which we consider somewhat overdue.

This discussion then is translated into Draft LTP Policy PD 0.3:

*“Where possible, **transport strategies arising in support of development should have regard to the potential to achieve betterment for trips originating near the development, and facilitate or synergise with priorities for investment with neighbouring authorities and transport providers including; Highways England, bus operators and Train Operating Companies. This should be considered on the basis of travel corridors, such as the M5, A46 or other locally strategic corridors.**”*

This is followed by Draft LTP Policy LTP PD 0.4 – Integration with land use planning and new development:

*“GCC will work with local planning authorities to **make a positive contribution towards a step change in sustainable land use planning** and enable multimodal transport opportunities **with a clear priority towards sustainable travel choices**. GCC will support planning authorities and require developers, through agreements and securing of planning obligations; to mitigate against the impacts of proposed new development on the transport network and transport infrastructure...”*

The Stroud Local Plan therefore **needs to ensure that its spatial approach much more clearly and explicitly is tied to these core mode shift and capacity optimisation objectives and draft policies in the LTP.**

This is not merely a matter of responding to the Draft LTP. It is also an imperative that is explicit demanded by paragraph 102-103 of NPPF 2019: *“The **planning system should actively manage patterns of growth** (such that) **the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account** – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains”.*

At the moment the draft Stroud Local Plan Review barely acknowledges these imperatives in its discussion of challenges and Strategic Objectives, and fails to effectively and explicitly demonstrate how the draft policies and allocations serve to achieve them.

### *3.3.1. Key Sustainable Mobility Corridors in Stroud in the Draft LTP*

For road based public transport, Draft LTP paragraph 5.15 states the priority of County for the Central Severn Vale, spilling over towards the northern communities in the District, will be to realise the following key priority: *“**Local bus services will be further strengthened through significant investment in bus priority measures, a high quality vehicle fleet and improved accessibility through mobile phone apps providing real time information and integrated ticketing solutions. Strategic interchange hubs at all M5 motorway junctions, all railway stations and some other key locations will link the core public transport corridor and these high frequency, high quality bus services to long distance travel opportunities.**”*

For the Severn Vale within Stroud District, this is mirrored by paragraph 3.50 stating *“All four rail stations in the area will develop into strategic interchange hubs, ensuring easy access to major urban centres in Bristol, Swindon and London, as well as the Gloucester and Cheltenham City region. **High frequency bus routes will connect these stations to larger settlements, including potential new settlements in the Sharpness area...**” (para. 3.50) “**An additional rail station or sustainable transport hub for high frequency bus travel could be provided between Stonehouse and Gloucester to take the pressure off of the network** which, if the station or hub was not provided, would result in residents having to travel north or south into Stonehouse or Gloucester respectively for sustainable onwards travel. Residents in the south of the area may benefit from additional stations outside of the county boundary for travel to Bristol and the South. (para. 3.51).*

These objectives are highly relevant to the District, and the potential to transform public transport connectivity in Stroud, not just for local journeys but the kinds of longer-distance travel that reflects existing and likely future patterns of movement in the District and across its boundaries. Stagecoach

is already committed to investing to deliver against all these priorities. Indeed, our recently-relaunched App already provides a moving map display as well as real-time information, and smart ticketing.

**It has to be stressed that for bus and coach to deliver both the capacity and quality of service required to meaningfully divert a significant proportion of trips currently made by car, will demand a huge boost to outputs. Service frequencies on the existing key core bus corridors will need to at least double. Entirely new services will need to be provided, both within the District and in particular cross-border towards Bristol from the largest settlements, along the A38 and/or M5.**

Looking at the County's Draft LTP and the Public and Community Transport Policy Paper, this suggests that a great many bus services in Stroud District need to be uprated from the "Tier 2" category in the Bus Network Strategy to "Tier 1" status: commercial routes of at least 30 minutes frequency. (Table C Page 15). It is regrettable that specific corridors identified for augmentation in support of the LTP objectives all lie within the JCS area: a point that we will be putting to GCC officers directly, shortly. We believe that the Sustainable Movement Corridors within the Stroud STS, and an additional one we identify between the A38 and Wotton via Charfield and Kingswood, should be included as specific areas for intervention in the new LTP.

For these reasons, and others, **we see a compelling case to extend the "rapid transit" corridor that in the Draft LTP terminates at Hardwicke, south into the District along the A38 past Whitminster, at the very least to Stonehouse/Great Oldbury, but also to Stroud.** This could make use of the targeted re-assignment of general traffic towards the A419 Ebley Bypass, leaving the original route through the heart of the built-up area as a sustainable access spine, prioritising efficient and reliable movements by walking, cycling and bus services, both local and longer-distance. We had previously signalled this to the Council, and we will continue to stress the importance of this opportunity to the County Council in the days ahead. It could also leverage development opportunities in the Plan east of the M5 at junction 13 (and facilities associated with the proposed new Football Stadium), or other significant possible opportunities to the west, on which we comment elsewhere at more length.

Gloucestershire Draft LTP also sets out a clear aspiration to strengthen core public transport corridors by greatly improving interchange with last mile modes of all kinds, now and in the future, not merely focussing on Park and Ride, which are effective only in a much more limited range of contexts. This is set out in the Public and Community Transport Policy paper at Section 8.1.1-8.1.2:

*"Gloucestershire has plans to move towards an interchange model, which is multi-modal and encompasses car share, community transport demand responsive services, bus, rail and bike interchange facilities. These Interchange Hubs will support housing growth pressures, urban traffic congestion, carbon emissions and rural transport challenges.*

*...Transport Interchange Hubs are the future new model to replace existing Park & Ride facilities and consider additional locations. These hubs should be located on strategic rail or bus corridors where existing commercial super high frequency services (core super routes) and frequent services (high frequency) are in place. In addition, Strategic Interchange Hubs will become a vital transport strategy at interchange points on the highway network, e.g., at motorway junctions, such as M5 J10 & J12*



*where the opportunities to remove traffic from the highway network is greatest and the potential to attract commercial bus services is viable in the long-term.”*

This approach is set out in Proposed LTP Policy PD1.6.

**We endorse strongly the Transport Interchange Hubs policy logic and vision.** Indeed we have been pressing for the County to look at adopting a policy focus of this kind for a considerable period. We see similar language picked up in the STS, which is very welcome, and one of the clear areas of emergent alignment between the new LTP approach and the transport strategy behind the Local Plan Review. **Adding a further level of definition to these is important and is something we are especially keen to work with District, County and Highways England officers to achieve.**

It must be stressed that these Draft LTP aspirations also are relevant to the cross-boundary movements originating within the District towards both the north into the JCS area, (including Cheltenham with a proposed facility on the A46 north of Brockworth that would be relevant to many District residents) as well as to the south that use M5 j14, within South Gloucestershire. A local interchange hub at Falfield serving j14 has featured for some years in South Gloucestershire Policy. As we comment elsewhere, strategic upgrades to local bus and longer-distance coach services are especially relevant to optimising the capacity of highway infrastructure in the south of the District.

We would however, urge caution should a view potentially be formed that buses will pay predominantly a local feeder role to rail within the District, and the inference that most mode shift would be to rail. For a start, a much larger number of railheads would be necessary within the District for this to begin to be logical. Nor are key destinations within the West of England or JCS area, conveniently rail-served.

Multi-modal journeys involve significant complexity in terms of co-ordinating operational delivery, which is at least as hard to effect as seamless sale and payment. Only where there are frequencies that are significantly more frequent than every 10 minutes, on bus routes and urban metro rail, are such journeys typically attractive, since connection related delay and risk is reduced to low levels. This is simply never going to be the case in Stroud District or indeed in Gloucestershire more broadly. Seamless public transport options offering competitive convenience against car use in the majority of cases of up to about 25km, will only be achievable within the scope of a single direct bus or coach journey. The Draft LTP seems to implicitly accept this in para 3.51.

We note the comments at paragraph 3.55 regarding Sharpness: *“However, **Sharpness is isolated in its location so would require a range of transport modes to serve external trips**” (our emphasis).* We have already made plain to the Councils, as a major rail and bus operator (including of trams and tram-trains) that **we see no business case for such links**, principally because this very isolation means that they could not credibly offer enough residents a sufficiently attractive and relevant choice to begin to defray the very high fixed costs of operation, whatever delivery model was used. We discuss this in greatly more detail elsewhere in our site-specific representations.

However, we strongly concur with the strategic transport vision that states at paragraph 3.55 *“The combination of the increased MetroWest (local rail) services, express bus services into surrounding settlements and new developments as well as dedicated cycling and walking networks ensures that **Cam and Dursley station is the focal point of the allocation sites in the southern part of the Severn**”*

***Vale and links to it should be prioritised and maximised to their full potential from future development.”***

**We strongly and unequivocally endorse this vision for Cam Station acting as a sustainable development and mobility hub.** Achieving it should represent a central tenet of the Draft Local Plan strategy, if it is to be compliant with NPPF policy in paragraphs 102-103. As far as possible this would include opportunities for sustainable development within easy walking or cycling distance of a substantially upgraded station and interchange at Cam, that exist at Wisloe Green and Draycott/NW Cam, as well as the consolidation of the NE Cam commitment, which the Preferred Strategy proposes, and that we strongly support. Achieving this will require substantial improvement of the station itself and access directly from the A4135 for buses and other modes, not least cycling. Even if walking, cycling and micro-mobility were to be the dominant modes to access rail services, by a greatly larger number of users, this would still serve to ensure that buses would be less prone to traffic related disruption arising from car-borne traffic, both in the immediate area and beyond. Box Road simply can no longer be seen as providing an appropriate route to access the Station in the medium or longer term.

It is very important to note the vision continues: ***“In addition to the rail network, the M5 will remain a key transport corridor with a number of express bus services operating on it allowing for regional and national travel. The express bus services can serve additional interchange hubs located at the junctions on the M5.”*** This significant potential is something we have been signalling to stakeholders for some time, and it includes clear opportunities at junction 14 as well as j13. In connection with this, the potential for a third eastern sustainable access corridor branch towards Charfield within SGC, and then Kingswood and Wotton under Edge within Stroud District, involving local and potentially longer-distance express bus and coach services, is one that we continue to signal strongly. This is covered in more depth in our site/corridor specific representations that follow.

Paragraph 3.48 discusses the Gloucestershire 2050 aspiration for the delivery of a bridge between Sharpness and Lydney. However it concludes that ***“However, the wider transport impacts of a third Severn crossing still need to be better understood.”*** We entirely agree. The text makes clear that the rationale for such an undertaking would be development-driven, much more than accessibility or transport-driven, and as such we would argue that it is a “solution seeking a problem to solve”. It is unclear if this is a rail or road bridge, or both. It is even more unclear how such a structure would assist sustainable access and movement demands from Stroud District.

### ***3.3.2. The future role of rail for journeys from Stroud District***

The County Council, like so many other authorities, has a quite clear, specific and ambitious vision for the potential role of rail, and how it would like to see both services and stations developed to improve the capacity and attractiveness of the railway to meet a wide range of travel needs more sustainably, while reducing the pressure of increasing travel demands on the highway network.

These aspirations as far as they apply to Stroud District have been covered in section 3.3.2 above.

However, there is particularly strong set of long-held aspirations for the railway in Stroud District. It is important that in plan-making, aspirations are not conflated with deliverable projects.

In particular, The County has clear aspirations for a very substantial increase in rail service frequency and connectivity, not least on the main north-south rail link through the District linking Gloucester with Cam, then Yate and Bristol. At paragraph 5.13 Draft LTP discloses that County officers believe that *“The current trend of increasing passenger numbers travelling by rail will continue, with officers lobbying for a 20min service on the Bristol to Birmingham line stopping at Ashchurch, Cheltenham, Gloucester and Cam & Dursley, as well as a 20 min services from Cheltenham/Gloucester to Cardiff (Stopping at Lydney).”* This statement reads somewhat like a prophecy, which is inappropriate given that the document goes on immediately to concede that *“This level of growth will **only be possible, if supported by substantial investment in rail infrastructure** including the two passing loops listed in the LTP schemes list and substantial line speed and signals improvements.”*

Nationally, there is very wide evidence that the railway simply is not able to resolve and meet the number and nature of the demands that multiple stakeholders, not least the development sector, want to make on it; many of which are in technical conflict with each other. With rail passenger boardings in England at a historic high much on the network is effectively full, following several decades of strong growth fuelled to great extent by the incentives in early franchises for Train Operating Companies to build their timetables up to run as many services as possible.

The LTP Review includes Policy Paper 5 – Rail, devoted to this mode. This outlines the aspirations in a more holistic manner. It also makes clear that significant constraints exist on delivering these upgrades:

- Gloucestershire County Council has, in essence, a lobbying rather than any decision-making or funding role, which ultimately lies with the DfT which oversees Network Rail and the various operating franchises. This is admitted in policy Paper 5 at paragraph 1.1.5, page 6.
- The network planning system and processes within Network Rail are complex and are undergoing major structural change. The transparency of projected dates for delivery under the new Continuous Modular Strategic Planning Process seems lesser than the previous planning framework. The funding and delivery of the vast majority of such investment is, of course, in the hands of Network Rail, whose delivery programme is constrained by nationally-set budgets and wider regional strategies at a wider-than-local scale, which unavoidably informs both prioritisation and the business cases for any specific interventions.
- Evidently, local aspirations are held in significant tension with these larger scale constraints. It should be noted that a 20-minute frequency is significantly higher than the current aspirations set out for a possible extension of MetroWest Phase 2 beyond Yate, which looks to a 30-minute frequency between Bristol and Gloucester/Cheltenham as noted in Draft LTP para 3.49. Even the MetroWest phase 2 extension has the status only of a potential project, for which the Council is lobbying with other stakeholders, rather than being a committed scheme.
- All the stations within the County are surrounded by significant physical constraints on expansion, particularly of car parking, but also of significant inter-modal upgrade. Most are also quite disadvantageously placed with respect to key central area destinations, and centres of population.

Draft LTP Policy PD5.1 Rail Infrastructure Improvements makes very clear that, however clear the aspirations are, the delivery of any of them within the next 10-12 years at least is open to

considerable question, since none are actually programmed or committed for funding. This includes a half-hourly extension of the MetroWest stopping service beyond Yate north to Gloucester via Cam. Policy PD5.1 makes clear the best to which the County can commit is to: *“Explore with Great Western Railway and Network Rail the most effective approach to station development and stopping patterns at Cam and Dursley on the Bristol-Gloucester route.”* Similarly, *“Third party proposals for an additional new station south of Gloucester will need to be accompanied by a robust business case.”* Such a Business Case, would, of course, be made not to GCC, but to the rail industry. To date no such case has garnered interest.

As far as the Sharpness Branch Line is concerned draft policy 5.1 goes as far only to state that the County will *“Protect the freight line at Sharpness for future use”*. This is no more practical value than the effective policy that the rail industry has had for the line for over 25 years. It falls short of even taking any evidenced view as to the feasibility of this, much less a commitment to a definitive project.

Simply put, improved services and facilities on the railway through Stroud District lie beyond the power of any local stakeholder to deliver, and there are no well-defined or funded rail industry plans at this time to bring any of the aspirations forward. Previous Local Plans had relied to some extent on a new station at Hunts Grove, an aspiration for over 15 years. This seems no further forward now than at the time the RSS for the South West was being advanced in 2005.

Given the way that the railway has been a key articulating and structuring principle behind some major aspects of the Local Plan strategy, not least the new town at Sharpness Vale, justified until very recently by the claims that it could be sustainably facilitated by the re-opening of the Sharpness Branch, this ought to give both the Councils pause for some very serious thought indeed.

We are aware that Gloucestershire County Council has commissioned a major study to evaluate the relative technical feasibility and business cases for a full range of projects and intervention on the railway in the County, having regard as far as possible to the rail industry and DfT’s larger scale commitments and project planning. We welcome this Gloucestershire Rail Investment Strategy (GRIS), which will sit alongside and no doubt help inform the final LTP. It will among other things, provide all stakeholders, including Local Planning Authorities and development promoters, with some very useful clarity – “a sense check” - on the relative merit and feasibility of potential projects. While we are apprised that the Final Report has been received it has not yet been published. This is disappointing.

However, based on our extensive experience and knowledge of passenger transport planning and operation across all modes, nationally, we would be quite astonished if the GRIS has concluded that re-opening the Sharpness Branch line to passenger rail services will ever present a justifiable business case, especially when to do so would prejudice capacity and frequency upgrades on the whole line between Bristol Gloucester and beyond, serving a vastly wider range of potential trip demands.

This should be contrasted, strongly, with the ability that both Councils have, alongside Highways England and ourselves and other bus and coach operators, to deliver high quality infrastructure to support an unprecedented step change in road-based public transport capacity and quality.

### *3.3.3. Stroud District Sustainable Transport Strategy*

Stroud District Council commissioned AECOM in 2019 to prepare a transport strategy document to support the Local Plan Review. This Sustainable Transport Strategy (STS) was published in draft form alongside this Consultation at the end of November 2019, a few months in advance of the Draft Local Transport Plan. The inability of the STS to fully reflect the LTP Review means that it is likely to require some significant further work and refinement to bring it more fully into alignment with it, as well as to take on board further more detailed input from transport stakeholders, including ourselves, we trust.

The STS also stands alone as a policy document with its own independent with its own discrete description of challenges and opportunities facing the District, and an equally discrete set of Strategic Objectives which while paralleling the LTP and Draft LT, are not the same, and serve to diffuse the potential focus that might be achieved by drawing more directly on the County Councils analysis and vision. The SDS simply does not sufficiently highlight to important high-level issues and imperatives that the Draft LTP does: in particular, the unavoidable need to shift patterns of transport provision, decisively and significantly, away from single occupancy car use, which dominates travel choice today in the District to an unusually great degree.

It pulls together a great deal of relevant information, but it fails to develop a coherent and compelling narrative and solution set, that can then help drive the identification of the most sustainable development strategy options, and thereafter, allocations.

In so doing, the SDS in many ways is used to bend transport objectives and initiatives towards the chosen development strategy, rather than the other way round. This is both inappropriate, exposes the Local Plan to the charge of being ineffective and improperly justified, and is thus somewhat troubling. The most obvious example of this is the treatment of Sharpness as an appropriate strategic development opportunity, when the transport evidence, at least, far from demonstrates this.

However, the STS does manage to very helpfully draw together the content of the existing LTP with the wider background evidence of demands and pressures on transport networks within the District and to neighbouring areas. As such, it makes a very useful potential contribution to the defining more clearly what the Local Plan strategy ought to achieve in transport and accessibility terms, and how it might achieve it.

However, the Strategy needs to follow through to set out some key transport objectives and a clear transport narrative to justify the selection of the spatial strategy of the plan. Here a great deal of further work needs to be done, collaboratively with the County and other transport stakeholders. The Strategy summary in Chapter 5 is aspatial on the one hand, and entirely non-committal on the other. The content of the STS in many respects, beyond a general policy review, is the listing of a very long list of potential projects, rather than a set of deliverable, measurable outcomes that flow from a cogent and compelling analysis and vision. The STS, on Page 17, in fact suggests that the role of the Strategy is to define the “policy basis” for more detailed strategies for specific modes, including active travel and public transport.

The “Interventions” for bus set out on Page 19 go little further than re-stating some of the most recent broad national aspirations for bus, which while relevant and welcome, neither start to evaluate what is required and achievable with regards to the local challenges and the unprecedented scale of growth required in the District, nor start to define the key deliverables that would achieve those goals. This, like much of the rest of the STS, appears disappointingly like “kicking the can down the road”, and leaving the important tasks of defining outcomes and project scope, and designing deliverable solutions in response, for yet another day. If the Climate Emergency is a reality, this is time we simply do not have. Irrespective, by this stage, we would have expected this sort of work to be being done, in collaboration with us and no doubt a good many others. It has not been.

**The most useful contribution of the STS is to clearly define the Sustainable Movement Corridors that currently accommodate the bulk of travel flows, and which pose both the greatest challenges and the greatest opportunities to accommodating the current and future demands likely to arise by much more sustainable means** - something the Draft LTP Review also highlights. These also, encouragingly to some extent, reflect and pick up on a wider range of our earlier comments and inputs, both on the over-arching strategy and on specific potential allocations.

These corridors are limited in number and reflect the way that the physical characteristics and constraints of the District have especially strongly influenced patterns of settlement and movement, over many centuries. The result is that successive technological shifts have tended to reinforce the same broad network corridors, creating parallel networks: canals, railways, roads and so on. These fundamental constraints, and well-defined alignments of demand, greatly circumscribe both the ability and the need to focus on creating entirely new links. Not only that, but the Plan’s supporting transport interventions are able to re-purpose the historic canal and rail network to provide direct and potentially attractive seamless corridors for active travel, and potentially, micro-mobility, away from parallel congested roads. More recently, as we have previously pointed out, the construction of both the M5 and improvements to the A419 have created to opportunity to reallocate road space on the parallel historic highway routes, notably the A38 but also the former A419 within Stroud, to prioritise public transport and sustainable modes: potential that to date has been entirely overlooked.

These Sustainable Movement Corridors, shown on Figure 1 of the STS, all align with existing and potentially improved public transport provision.

They are:

- A38 Gloucester-Quedgeley-West of England CA area, passing directly through few significant settlements, but very close to Stonehouse and Cam/Draycott. The direct route and lack of intervening settlements lends itself to express bus and coach services, as we have previously highlighted, while key opportunities for Intermodal Interchnage at the nodes formed with the other Corridors and the SRN at junctions 12, 13 and 14 are also acknowledged, if not strongly highlighted.
- A419/B4008 Whitminster-Stonehouse-Stroud leading east from the A38 to the largest centes of population in the District. The combination of this with the A38 corridor to provide a direct longer distance public transport link from Stroud and Stonehouse towards Bristol is also set out as a separate Corridor in the STS: however, it should in or view be seen as a set

of objectives related to these in combination, and helping to catalysed synergies with bus and coach services along the A38 and M5, facilitated by optimally sited inter-modal interchanges, helping to anchor a sufficient level of overall demand to support a level of service that effectively meets a range of local and longer distance needs.

- A4135 Slimbridge-Cam-Dursley: a second west-to-east limb from the A38 also passing close to the only station on the N-S rail corridor at Cam, and leading to the second largest concentration of population.

These corridors are begged as the focus for both strategic development and comprehensive public and sustainable transport improvements; and align with our own previously stated views and advice.

In particular, we strongly endorse the conclusions in the STS for each of these corridors set out within Chapter 5, which closely reflect our previous input.

To these **we would add third lesser but important eastern limb leading from the A38 at Falfield across the M5a at junction 14 to Charfield within South Gloucestershire, before passing into the District West of Kingswood and passing a major employment focus at New Mills, before reaching the significant albeit rather smaller market town of Wotton under Edge.** There are already significant flows along the route, followed by the B4509 and B4062/B4060. These relate to trips of varying lengths including to and from secondary and post-16 education, employment within the area and beyond it, and retail, leisure and other amenities. While public transport along this corridor is today very limited in availability and relevance, we had some time ago identified the significant potential that exists here to kick-start a greatly more attractive level of service, particularly if it could be catalysed and anchored by additional development on an appropriate scale.

Much of this was until recently proposed within South Gloucestershire, at Thornbury, Buckover and Charfield, within the JCS. While the planning status of the most strategic options has fallen away with the recent withdrawal of the JCS, substantial commitments already exist at Charfield. Land for a further 250 dwellings at Charfield directly on this corridor is under active promotion, immediately adjoining and west of the County Boundary, for which we have already agreed a costed strategy to improve the bus service between Thornbury, Charfield and Kingswood to every 30 minutes, extending beyond to Wotton, and potentially alternately every hour to Yate.

Should development on a strategic scale come forward at either Charfield or Buckover, or both, the scope exists, alongside relatively easily-achieved extension of the MetroBus infrastructure up the A38, to further greatly enhance the level of service.

As we have consistently stated, **if public transport and active travel is to play the fullest possible role, the District's spatial development strategy will have to align as closely as possible to the District's transport strengths and opportunities. These all lie on the Movement Corridors, being both closest to existing concentration of population and activity, and the main flows between them. These Sustainable Movement Corridors should be seen as one of the key articulating principles of the Plans spatial development strategy.**

To focus strategic development away from the Corridors, more distant from these centres, and these higher-volume flows, is entirely unable to secure and capitalise on existing assets and services, and future potential for sustainable movements, especially by shared and public transport.

**It is regrettable that the opportunity to use the STS work, and the Sustainable Movement Corridors in particular, to clearly and explicitly steer and justify the Local Plan Strategy has not been exploited to the degree that it ought. Most of the proposed allocations relate well to the Sustainable Movement Corridors,** and if there were any doubt about this, we could suggest some detailed changes to provide further confidence and strengthen the structuring narrative significantly in support of most of the Plans strategic allocations.

However, the proposals at Sharpness Vale stand isolated and well adrift from the pink Movement Corridors in Figure 1 of the STS, tenuously clinging only to the very distant hope that the rail branch could be reactivated. As a result this part of the Plan strategy is a clear “dead-end”, sitting incongruously and quite uncomfortably within the STS, and the Local Plan itself.

### **3.4. Settlement Role and Function Study Update**

The Plan and its Sustainability Appraisal draws deeply upon evidence in the Settlement Role and Function Study Update (SRFSU) published in May 2019, that drives the categorisation of settlements, which is then expressed in Core Policy CP3; and that to a great extent defines the Local Plan Spatial Strategy and thus the approach to site allocations.

For a start, in assessing the ease of access to wider-distributed services and facilities not provided within many smaller **settlements we are far from clear how the existing and the potential usefulness and relevance of sustainable choices to meet day to day travel needs drives the evaluation of accessibility in the SRFSU, and then the SA.** These matters are covered in Section 3 of the SRFSU.

What is meant by “good”, when travel choices to access employment or higher-level services, leisure and retail elsewhere is considered? This is a term used to describe most of the Tier 2 settlements, which are seen as appropriate to accommodate a modest level of growth both in the current Local Plan and the emerging development strategy. This tier includes settlements that, in many contexts, would be rather more likely to be described as “substantial villages” rather than “market towns”.

Whatever such settlements have in common in terms of the availability of services and facilities, it must be said that the level of existing and potential public transport provision is widely divergent. Only Nailsworth and, shortly, Hunts Grove, offer hourly or better bus service frequency to the nearest higher-order centres. By contrast, the public transport choices available, or credibly available at a number of Tier 3a settlements is greatly higher than this. As diverse a range of settlements as Brimscombe, Eastington, Hardwicke, Kings Stanley, Leonard Stanley, Painswick, Upton St Leonards, Whitehill and Whitminster have at least an hourly bus service on offer 6 days per week. Often these run to not just one higher-order destination within convenient journey time, but two or even more.

It is ironic, in fact, that most **Tier 2** settlements are so poorly served by public transport. This says, in our view, a great deal about the **fundamental inaccessibility of these places.** The lack of bus services in these settlements reflects, in the main, both their relative remoteness from higher-order centres (helping to maintain local shopping facilities to some degree) but also their distance from the main movement corridors between the exiting larger towns, and destinations beyond the District.

Looking at the accessibility criteria in Section 3 of the SRFSU, the transport offer makes no reference to buses or local public transport **at all.** The presence of a rail station (of which there are only three



in the District, all serving only serving longer-distance inter-urban travel demands) is one of only two transport-related criteria. The other is the presence of a petrol filling station. This is properly a retail function; especially since fuel vending in the UK has long been loss-making, and is generally tied to convenience retail or larger foodstore provision. Looked at in these terms, the **Plan strategy, in what is a very rural district with no very large settlements, has been built entirely without regard to the even the current, much less the potential availability of public transport choices:** even more alarming when the opportunities to grow the small number of largest settlements, where these choices are most likely already to exist, is so heavily constrained, making it essential to look at “the next tiers down”.

Most of the Tier 2 settlements benefit only from bus services subsidised by Gloucestershire County Council. These are “policy-driven” not demand-driven service designs. They are aimed at providing a basic level of service to essential users only: those who cannot drive. As the table before makes plain, this typically means a bus journey will take upwards of 40 minutes to the nearest town with perhaps 3-6 departures per day. This is not a credible choice to anyone except those who are somehow unable to drive, with a great deal of time on their hands.

To assist the Council, we set out in the table below the current level of bus service provision in all the Tier 2 and Tier 3a settlements

**Table 3.1: Comparative Bus service availability and quality for Tier 2 and Tier 3a settlements**

Settlement	SRFSU/ Policy Tier	Service frequency	Destination	Journey time	Commercial?
Berkeley	Tier 2	6/day	Bristol Dursley	48 mins 41 mins	No
Minchinhampton	Tier 2	5/day	Cirencester Stroud	Varies 18 mins	No
Nailsworth	Tier 2	30 mins	Stroud	18 mins	Yes
Painswick	Tier 2	60 mins	Cheltenham Stroud	41 mins 9 mins	Yes
Wotton under Edge	Tier 2	120 mins 120 mins 60 mins	Dursley Thornbury Yate	24 mins 28 mins 50 mins	No; potential
Bussage (Manor Village)	Tier 3a	60 mins	Stroud	20 mins	Yes
Brimscombe	Tier 3a	Up to 3/hr	Stroud	6 mins	Yes
Chalford	Tier 3a	4/day	Cirencester Stroud	19 mins 12 mins	Yes
Eastington	Tier 3a	60 mins	Dursley Stroud	17 mins 32 mins	Yes
Frampton on Severn	Tier 3a	1/day	Gloucester	53 mins	No
Hardwicke	Tier 3a	12 mins 30 mins 30 mins	Gloucester Gloucester Stonehouse	23 mins 20 mins 15 mins	Yes
Kings/Leonard Stanley	Tier 3a	60 mins 60 mins	Stroud Stonehouse	14 mins 16 mins	Yes
Kingswood	Tier 3a	120 mins 120 mins	Thornbury Yate	25 mins 46 mins	No, potential

Newtown and Sharpness	Tier 3a	6/day	Dursley Bristol	32 mins 51 mins	No
Woodchester	Tier 3a	30 mins	Stroud Nailsworth	11 mins 8 mins	Yes
Whitminster	Tier 3a	120 mins	Dursley Gloucester	22 mins 29 mins	No, high potential

The assessment summary in Table 5 of section 3, with its scoring system, shows just how crude the methodology is. In fact, it becomes plain that **rather than looking at settlements, the scoring is evaluation the endowment of the civil parish**: in a rural area, a somewhat different geographic unit, covering a substantial rural hinterland around each settlement. **This has no regard to whether the facility concerned is reasonably or conveniently accessible from the settlement** with the same name, except by motorised means. This leads to some somewhat large distortions: Berkeley is considered to have a FE College (the UTC at the former power station about 2 miles away) while Kingswood, which has the Katherine Lady Berkeley Secondary School and 6<sup>th</sup> form directly adjacent to the village, is not offered the benefit of this in the assessment because it is not within the Parish boundary.

Then too there is the somewhat spurious distinction between parishes within larger urban or settlement groupings: Brimscombe and Cainscross, for example, which are an integral part of the Stroud urban area. Another example of the spurious distinction this throws up is Kings Stanley and Leonard Stanley which are directly adjoining one another and functionally operate as one, certainly as far as service delivery and viability are concerned. It is hardly a surprise that Leonard Stanley has no local shop within its boundary. They are treated in the assessment as separate discrete settlements, that have no functional relationship to one another. The SRFSU, like its 2014 predecessor, is actually geographically shortsighted, to the point of near-blindness.

The accessibility matrix in Table 6 is similarly crude, which in terms of its results, demonstrates a marked skew towards accessibility on foot to local facilities. This merely reinforces, by a somewhat circular logic, the categorisation of self-containment for local services and little else, not accessibility to facilities and services “elsewhere”. Indeed, looking at this table, almost all settlements are apparently well connected by foot and bus to a full range of local services. Nor is it at all clear how far the safety of walking routes and the frequency of the bus service, and its hours of operation, are a factor that has been picked up in the automated process. Presumably the existence of a line on the map connecting two places is sufficient. Looking at the table it is hard to draw a clear categorisation at all, so “good” is sustainable accessibility alleged to be across much of the District. The use of some effusive adjectives to describe most of the categories is a notable and marked weakness of all this work.

Extraordinarily car-dependent places, with virtually no facilities credibly available within easy reach without the use of the car, are described as having “fair” levels of access. This is true- but only by car.

**We have significant problems with the factual accuracy of some of the SRFSU data and scoring.** Whitminster is seen as “poor” while Berkeley, Sharpness and Newtown are seen as “good”. Reaching

a library or Minor Injury Unit within 30 minutes of any the latter by sustainable means looks to be practically impossible. By contrast, it might take a little more than 30 minutes to reach a General Hospital from Whitminster on service 60 (29 minutes journey time to the Gloucester Bus Hub within a short walk of the Royal Gloucestershire Infirmary) but even factoring a walk in the Vale Community Hospital in Dursley is probably actually achievable, just, within that time. It is certainly the case that Tesco or Aldi in Quedgeley, is reachable within 15 minutes of much of Whitminster on the bus, even factoring a walk in to the stop. Whitminster seems to have been substantially and incomprehensible under-rated by the study, even on the basis of the current service offer. Berkeley, Sharpness and Newtown seem to have been systematically over-rated.

We agree with the statement in the document that the score for Newtown and Sharpness is “surprising” and suggests, along with **a wide variety of other anomalies discussed in Section 3.26-3.30, that the methodology actually obfuscates rather than exposes the important distinctions in accessibility. So concerned are we with the methodology, that we have no confidence whatever in the SRFSU, with regards to sustainable accessibility.**

The ready availability of secondary education within walking or at least safe cycling distance, the absence of which creates both a statutory budget pressure on the County Council as well as driving a great deal of peak demand on the highways network seems to be considered fairly immaterial in forming judgments about where development might be focused. We would point to the judgments made about Sharpness and Newtown, for example, and contrast those with judgments made about Whitminster and Kingswood; or at the higher tier 2, between Berkeley (remarkably, considered to be a “market town”) and Wotton under Edge or Cam.

Perhaps the most accurate and telling statement is that in paragraph 3.26: *“It is notable that almost all settlements are able to access the key (day-to-day) services and facilities within 15 minutes by car... the contrast between drive times and walking/public transport times highlights how car-reliant many of our (rural) communities are.”* When one considers that residents will be seeking a wide range of goods, services and amenities, not just day-to-day ones, and not just the level of choices that may be offered at the nearest facility, we would suggest the wider car dependence of all the District’s settlements - including Stroud and Dursley - is not hard to understand.

This shows how vital it is that the spatial development strategy of the Plan robustly and clearly establishes where the potential to radically improve sustainable transport choices in the short to medium term actually lies, for existing residents as well as future one.

### **3.5. The Strategic Assessment of Land Availability**

The Sustainability Appraisal Report also draws very heavily on the outputs of the Strategic Assessment of Land Availability (SALA) to look at the relative merits of the specific development sites being considered, rather than the broader case for settlements to grow in principle.

The SALA methodology related to transport and accessibility *“rated the accessibility of sites by walking, car and bus in the District to town/district/local centres, employment sites and services and facilities that people may be required to access on a regular basis. Those draft site allocations which would provide development other than only employment (i.e. residential, mixed-use, etc.) and are*

*located in close proximity to the large settlements are amongst those which scored most favourably as part of that assessment work. These draft site allocations are considered most likely to help reduce the need to travel by private car in the District.” (SA section 5.15) This offers no great surprise.*

Given how few credible unconstrained opportunities exist to develop within or adjacent to the Tier 1 and Tier 2 settlements (many of the latter being within the AONB), the key issue for the plan-making process ought then to be how far other credible options existed within and adjoining lower-tier settlements, especially Tier 3a, particularly those endowed with higher-order service provision and nearby employment; and **also having regard to existing and potential journey time by existing or credibly-deliverable regular public transport routes to key large-scale employment and service concentrations**. Given the low public transport mode share, and high average JtW lengths as the very high level of out-commuting, the plans objectives will only be achieved having regard to these opportunities. Indeed there is no prospect whatever of achieving carbon neutrality with the current levels of car use by existing residents, never mind those within new development.

The SALA methodology is extremely crude.

It therefore is hardly surprising that the SALA methodology throws up the results set out at paragraph 5.15 of the SA 2019 Report, as it is unable to distinguish between sites that have bus stops within 400m (irrespective of the quality of service provided at the stops or the journey time to key destinations) and those that could offer high levels of public transport convenience to residents. The result is that previously developed land within the Stroud/Chalford Valley performs the best, despite the fact the level of service offered is no more than hourly, the service requires a steep uphill walk to access, and the services present neither a choice of arrival nor departure times, or even of destination (service 64 only serves Stroud Town Centre). The population hinterland of this service is actually relatively low and dispersed along the route, explaining why the timetable offer is at it is. We would add that much of this land, all falling within the Industrial Heritage Conservation Area, has been allocated for many years, in two successive previously adopted local plans, and has failed to come forward. We dispute that it is either particularly sustainable, or, in fact, particularly deliverable.

By contrast the extensions to Stonehouse and Cam/Draycott perform poorly. This is because they fall outwith the somewhat arbitrary 400m catchment of bus stops. No attempt seems to have been made to examine the committed delivery of bus stops (and more importantly bus services) associated with committed development, especially west of Stonehouse. The ability to see services extended, diverted or reinforced also seems to have been beyond the capabilities of the assessors.

The truth is, that the ability to see compact urban development and intensification on any meaningful scale, within existing built limits is entirely beyond the ability of the plan area to deliver. This has, of course been the primary focus of several successive rounds of plan-making for the last 20 years. The degree it was likely to be achievable, it ought to have been demonstrated over this period, especially given the prevailing approach of then-extant PPG3 between 2001 and 2009.

This being the case, the authors **needed to arrive at a methodology that could much more clearly differentiate between the existing and potential walking, cycling and public transport endowments of other sites**, whether adjoining or beyond the settlement limits of the Tier 1, and 3a settlements.

For employment sites, no attempt was made to understand if a relevant public transport choice existed **at all**. The assessment was tied to bus stops, not bus routes.

The methodology takes a very different approach to assessing the two existing proposed new settlement sites at Sharpness (PS36) and Wisloe Green (PS37), to other potential options. This is inherently **inconsistent methodology**, as other options have not been assessed on their potential to deliver substantial improvements to the sustainable transport endowment. PS21a North West Stonehouse, PS24 North West Cam, and G1 South of Hardwicke have demonstrable ability to help catalyse a step change in the availability of public transport not just relevant to the development, but the entire corridor served.

This exposes the fact that the **existence of current and potential high-quality public transport corridors have not demonstrably steered the formulation of the plan strategy**. Each site has been assessed on a *solus* and *stasis* basis. **This exposes that the plan has failed to recognise that the transport challenges and opportunities of the plan area relate to corridors, not to sites**, by their very nature, despite the fact that the Sustainable Transport Strategy advanced in support of the plan is structured in exactly this way, having regard to this reality.

Not only that, but the **actual deliverability of public transport measures in support of these new settlements was not appraised at all** by the SALA Transport Assessment.

At PS36, Sharpness, the site was assessed on the basis of a rail station (with indeterminate level of service) and express bus routes. The Sharpness promoter now accepts that neither is deliverable in the Plan period to 2041. **The result is, most importantly, the conclusions of the SALA and the SA about the sustainability impacts of the proposed Sharpness allocation PS36 are now open to the most fundamental challenge, from first principles.**

### ***3.6. Sustainability Appraisal Report***

The requirements of the SA process are set out clearly at the start of the document in section 1. It is notable that the methodology proposes as many as 16 thematic areas that it must specifically address. Transport is not one of them. Heritage (among many others) is. It is little wonder, then, that transport-related issues fail to register as centrally in the appraisal process as these other matters, despite the fact that many of the other categories have explicit transport-related dimensions; and that transport is proving to be one of the most complex areas to de-carbonise, with the result that even as its emissions reduce, its proportionate contribution is rising.

As far as transport is concerned - and sustainable transport modes in particular - the following SA assessment criteria are especially important:

***SA 6.1: Does the Plan promote compact, mixed-use development?***

***SA 10.1: Does the Plan avoid, minimise and mitigate the effects of poor air quality?***

***SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling?***

***SA 10.3: Does the Plan promote more sustainable transport patterns in rural areas?***

***SA 14.3: Does the Plan promote and facilitate the use of electric cars and sustainable modes of transport?***

We would add that SA requirements for economic development and socio-economic inclusion are also highly relevant in the formulation of a plan strategy that makes the “fullest possible use” of public transport to ensure that the most sustainable pattern and form of development is achieved, as also explicitly required by Paragraph 102 of NPPF 2019.

Given the limitations of the material on which the Sustainability Appraisal draws, outlined in the preceding sections, the origin of some of the very surprising assertions and conclusion of the document, and the draft policies in the Plan, start to become apparent.

The SA, drawing together a great deal of material that is at the same time both inconclusive, and also categorised and described in terms that make it even harder to draw accurate and substantiated conclusions, further compounds the fundamental difficulties and problems that arise in each of the contributing studies. The strategic approach is then very open to allocating growth, not according to clear evidence of relative sustainability, but other far less transparent criteria.

One good example of the mechanism by which this sleight is achieved is discussed in the SA Report at paragraph 2.35, where the revised approach to the Settlement Hierarchy set out at Core Policy CP3 is addressed. In this policy, the substantial relative variation between the settlement service and facility endowments both between settlement categories and within them, is reduced through the use of semantics, and a highly and unreasonably relativistic approach.

This is most clearly demonstrated by the language surrounding the settlement hierarchy in policy CP3.

Tier 3a settlements are said to be “those which have been identified as providing access to a **good range of local services and facilities.**” (our emphasis). From what we see in the Settlement Role and Function Study, in terms of the real requirements for regular and unavoidable trips (as opposed to discretionary and irregular ones), such a range is limited to a Primary School and some kind of convenience store.

It is clear that the distinction between Tier 2 and Tier 3a settlements has almost nothing to do with pronounced differences in their self-containment, or the level of credible sustainable travel options to reach a wider range of services and facilities beyond. In fact, even looking at self-containment, to all practical purposes the main difference between a Tier 3a and a Tier 2 settlement is the presence, or not, of playing fields and a Secondary School in the Parish.

This is further compounded by some particularly questionable assessments of service and facilities set out in the SRFSU. The distinction between the level of services needed to qualify for Tier 2, and that for Tier 3a is remarkably modest. This explains a lot of the results, and the difficulty of drawing clear conclusions that logically follow from clear evidence.

Many Tier 4a settlements, which are exceptionally small and in common parlance would be accepted as hamlets, devoid of much more function than as residential communities are characterised as having “good access to facilities and services elsewhere”. We have very little means to understand how such judgments have been made. By contrast for Tier 4 settlements, as paragraph 3.26 admits,

with the use of the car, a whole realm of options to access and facilities and services is no doubt available, even within a 5-8 mile radius: the statement describing the accessibility of Tier 4a settlements is therefore almost meaningless. The distinction between Tier 4a and Tier 4b seems rather to be related to environmental constraint on further development, rather than accessibility per se. However, as far as we can see, in practical terms, such access would in day-to-day terms, need to be by motorised means, and that would mean the car, in the absence of a “credible choice” of more sustainable modes.

What we do know, from SA paragraph 2.45, was that for all sites, the level of information used to assess the quality and relevance of sustainable choices was minimal. For employment and mixed use sites, the Strategic Assessment of Land Availability (SALA) methodology was used.

The statements in the SA regarding the likely achievability of sustainable transport link at each new settlement site, set out at paragraph 5.35, is not any longer fully supported by the evidence.

It is not true that: *“The new settlement at Sharpness would provide significant new sustainable transport improvements (including a new rail station and rapid bus services)”*. Rather, the promoter has made clear it will provide **no public transport offer at Sharpness**, either rail or road-based **at any stage in the plan period**.

Conversely, at Wisloe, the SA claims, with no evidence to back it, that *“the settlement at Wisloe would provide for less significant sustainable transport improvements (including connections to Cam and Dursley rail station and rapid bus)”*. Since the rail offer at Sharpness was realistically only ever going to provide a connection to whatever services were available at Cam and Dursley, the fact that this same station is likely to be immediately accessible to Wisloe by walking and cycling, points to Wisloe being inherently better endowed in rail transport terms, on even the most optimistic analysis of Sharpness’ potential. We have already made clear that Wisloe assists and consolidates patterns of demand to support high-quality inter-urban bus services in a way that Sharpness never could. In our judgment, as experienced public transport operators, Wisloe is greatly superior in this regard, offering the scope to catalyse greatly superior and more broadly significant sustainable transport improvements, whether rail, bus, coach or cycle, benefiting not only the site, but the full extent to the corridors concerned. We cover this in more detail in our separate site-specific representations.

There is a separate issue regarding access to secondary school provision. This is picked up on at paragraph 6.39, among other places, in the SA. In fact, neither Sharpness nor Wisloe is of a scale that would support a new secondary school, nor does either propose one. While Wisloe will offer public transport choices, and looks highly likely to be able to deliver a direct high-quality off-line cycle provision towards Rednock School in Dursley, it is entirely unclear how Sharpness will be provided for in this regard.

The SA is thus inadequately-informed, and demonstrates a regrettable lack of understanding on the realities pertaining even to these two strategic sites.

We would concur with the conclusions set out in paragraph 6.39 of the SA Report that: *“the policy approach set out through Policies CP2 and CP3 goes some way to provide a spatial strategy for development that could help to minimise the need to travel, particularly by private car. By concentrating large proportions of housing development at Tier 1 settlements where there is*

*currently the best access to services, facilities, jobs and infrastructure, there is potential to reduce trip distance and for a large proportion of trips to be made by more sustainable modes of transport.”* However our concern is that the basis on which key judgments have been made are ill-informed and at times, seriously flawed, especially with regards to Sharpness.

We have a wider concern that the plan simply hasn't picked up sufficiently on the opportunities to catalyse a step change in public transport provision and use, as is required by paragraph 102-103 of NPPF.

We also note the **SA Report makes no reference in the “Key Challenges” section to the need to enhance and prioritise sustainable transport to provide relevant choices to high levels of car ownership, out-commuting and car-dependence.** Rather, on page 36, the only opportunity identified is *“The re-establishment of the Cotswold Canals presents opportunities for the promotion of alternative modes of transport however there is a need to handle this sensitively”*. Presumably this refers to walking and cycling along the towpath. Any other interpretation, involving use of boats and barges to handle passenger trip demands, would be ridiculous.

However at Chapter 4 we agree with the conclusion that the Plan **could** achieve a substantial net positive benefit for the sustainability of the District, particularly with regard to climate change and pollution. Section 4.8 states *“Providing development at locations which would improve accessibility to employment opportunities as well as services and facilities should help to reduce the need to travel in the District, particularly by private car. A significant positive effect is therefore expected in relation to SA objective 10: air quality. A significant positive effect is also expected in relation to SA objective 14: climate change.”*

Given the Council's position on Climate Change, and the desire to achieve net carbon neutrality by 2030, this is even more pivotal to achieving the Plans most ambitious goal, expressed in new Policy DCP1. That is a long way from saying that the preferred option strategy **actually will** do so. It is accordingly vital that the SA robustly assess the options available to achieve the greatest possible reduction in personal car use, and the greatest possible take-up, in practice, of more sustainable modes.

The Sustainability Appraisal Process has no specific transport-related heading, while transport and movement impinge to a great degree on so many others of the categories under evaluation. Perhaps this explains the relative indifference to transport and accessibility among plan-makers, which this plan has failed to avoid. This contrasts starkly with the strenuous attempt to draw in complex data-sets on environmental and heritage constraints, as well as other aesthetic landscape and character appraisal considerations.

In reality, the SA process exposes the fundamental issue that the kind of development strategy and form that the Council seems to be seeking is still, at its heart “visually attractive” development, before all else. This is clearly not necessarily sustainable development.

Aesthetic considerations are, naturally, emotive, and being visually determined, often at the forefronts of stakeholders minds. Nor should they be treated lightly, much less set aside. However, the social, environmental and economic impacts of congestion and pollution are mainly invisible to



the eye. That should never relegate them to the typically subordinate position that they are here, as in so many other plan-making exercises.

**3.7. Conclusion on the justification for the development strategy: a basis for justifying a high level of future car-dependency**

**Without the evidence base and SA being able to evidence and draw clear distinctions between both the settlements and the specific site options, in terms of the credible choices that exist, or could exist, to take advantage of the highest quality of sustainable travel facilities, it becomes much easier to try to claim that dispersal of development to relatively remote rural areas, with neither current nor clearly deliverable sustainable travel choices, is appropriate, and is in fact sustainable and appropriate.**

**It also works quite effectively the other way around: the potential of relatively sustainable settlements can be hugely down-played, to justify overlooking those options entirely.**

All this should be viewed in the context of Draft Policy DCP1 “Carbon neutrality”, which in essence is intended to set the tone for the entire plan strategy. Achieving District-wide nil net carbon emissions by 2030 is extraordinarily ambitious. The achievability of this policy will stretch the imagination of all stakeholders to an extreme degree, if it is to be demonstrably achievable, as NPPF requires.

The SA follows this up in section 4 with the comment reflecting the Policy which states: *“Among the most significant of the policy’s criteria is a requirement that development must be located where it will minimise the need to travel, either through close proximity to essential services and facilities or through the actual layout of the development itself. Aside from the benefits in terms of mitigating climate change and reducing air pollution, there is potential for this requirement to ensure that residents within new developments can satisfy everyday needs within close proximity.”* (SA, section 4.56)

The opportunities to make fullest possible use of the opportunities for high levels of sustainable transport use in the Plan area are spatially very restricted indeed, reflecting the context of what is largely a rural district. These opportunities sit squarely on the Sustainable Movement Corridors set out in the STS, and which reflect the wider priorities and opportunities signalled in the County Council’s Draft LTP, just published.

Despite the obvious and compelling logic to using these to act as the scaffold for the Plans development strategy, the rest of plan’s evidence base, in particular the assessments of accessibility in the SALA and the SRFSU are extremely weak in identifying these opportunities. Indeed to the degree the wider evidence base attempts to look at sustainable accessibility, most notably in the Settlement Role and Function Study Update, the methodology and the data seem to be open to some serious challenge.

However, while these Sustainable Movement Corridors are relatively few, they do serve virtually all those parts of the District which host significant concentrations of population. Most importantly these corridors clearly offer the scope to radically more effectively serve existing and well as future patterns of demand. As such they provide an even clearer steer towards a sustainable spatial strategy than in more densely populated areas, where the baseline network density and overall service frequency level offered is so much the greater.

The SA and the supporting studies are fundamentally unable to distinguish properly and effectively between those site options able to take advantage of existing or potential relevant sustainable travel choices, and those that cannot. For the avoidance of doubt, an irregular shopper bus service does not represent such a choice, demonstrated by typically exceptionally low and declining levels of use, even by the elderly, for whom they are generally understood to be provided.

It is especially regrettable that the **SALA Transport Assessment clearly did not look at our already copious and clear input into where we currently provide the most regular and relevant bus services, on a commercial basis; nor where we saw the clear potential to greatly reinforce and extend the network of such services.** This is deeply concerning. It shows a very worrying lack of professional regard towards the consistent and vigorous efforts to which we have gone, to signal such opportunities to the Councils and, by extension, to their client team, both comprehensively, and at the earliest possible stage.

NPPF Chapter 9 “Planning for Transport” sets out at its inception to defined achievement of the transport-related strand of sustainable development in the clearest and simplest of terms: a strategy that *“focuses significant development on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”* Thus, the clear test set out in NPPF paragraph 102 is that the overarching strategy and strategic allocations **must demonstrate that this “genuine choice” of sustainable modes exists or demonstrably can be provided.** If not, the strategy, or site option, can only be considered car dependent, and this demonstrably unsustainable. Demonstrating this is not, in fact, conceptually or practically such a hard thing to do, especially if the input of the full range of transport stakeholder is sought and fully incorporated in the evidence.

NNPF does not stop there. It make very plain that *“where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development, should be identified...”*. Whatever the input of other transport infrastructure and service providers to the plan to date might have been, we have been singular on our focus of identifying just these opportunities, with evidence, as clearly and robustly as we can. While we see some use of this work in the Sustainable Transport Study, it is far from clear how some of the spatial strategy and the largest single allocation at Sharpness/Newtown, has been informed by robust transport evidence.

We are setting out here and elsewhere in or response further evidence, in much greater detail, to assist all stakeholders in this regard as part of this consultation response.

#### **4. Vision for the Future of Stroud District**

Stagecoach commented on the previous draft Vision.

Given new Policy DCP 1 it will require still more radical action, and a very much more ambitious – while demonstrably deliverable - vision and policy suite to address the transport-related issues within the District and across its boundaries.

For the plan to be effective, this vision needs to flow seamlessly through the document feeding in to an aligned and much more focused set of policies and supporting projects, that we are separately urging the County Council to set out its refreshed Local Transport Plan. The vision must much more

closely address the Plan's strategic challenges and Strategic Objectives. In so doing it will much more effectively support focused and deliverable policies, both strategically across the district, as well as to the growth allocations.

We still do not see that a clear enough vision for what sustainable transport needs to accomplish is firmly at the centre of the plan vision and objectives. The resulting strategy and supporting interventions as a result are not yet explicit enough, ambitious enough, and demonstrably prioritised with clear thresholds to measure and monitor success, to address the congestion, social inclusion, carbon emissions, and wider pollution impacts of the currently very high level of car-dependency in the District.

Just raising peak bus journeys to work to the County average of 4% implies a great step change in the attractiveness, relevance and use of bus services, especially at peak times, but also more generally throughout the day. Approaching the UK average figure of 7%, in a development with such compact larger settlements and clearly defined patterns of movement, is not likely to be impossible to achieve within a relatively short period, with an appropriate development plan strategy, focused collaborative work between the District and developers, the County Council, and bus operators.

## 5. Strategic Objectives

Stagecoach has previously commented on the draft Strategic Objectives.

What has become a great deal clearer, not least following the Council declaration of Climate Emergency and the governments wider legal commitment to carbon neutrality by 2025, **is that the Plan need to go forward on the basis of much more specific and clearly defined commitments to achieve sustainable mobility outcomes.** This is also clearly justified by the release, since the last consultation, of a great deal more updated and additional evidence, including the Draft Local Transport Plan to 2041, is that the focus on achieving greatly more sustainable patterns of movement (including to reduce the need to travel and distances travelled) and catalysing the delivery of radically more relevant and attractive sustainable travel choices.

This evidence is not just emerging from within the County. For example, the BBC has raised the latest academic study from UCL, that suggests that the outcomes of planning policy and development management processes have continued to hinder the development of attractive active travel networks across the UK. We can point to much more broadly-based research and analysis, including that from Greener Journeys, Transport for New Homes/Foundation for Integrated Transport, and the new professional guidance from the Chartered Institution of Highways and Transportation and Royal Town Planning Institution: *"Better Planning, Better Transport, Better Places"* published in August 2019. These point to the severity of the problems for all sustainable modes, and make a call for a substantial shift in planning practice.

Government is alive to these issues, and were it not for the recent election, we would no doubt have seen released into the public domain, a revised Planning Practice Guidance (PPG) for chapter 9 of NPPF; and a new draft Written Ministerial Statement on Development and the Strategic Roads Network, to replace DfT Circular 02/2013. Existence of these drafts is no rumour, and their emergence is imminent. We are very confident to signal that Government will shortly be expecting of the Council exactly what we urge.

There are **currently no Draft SOs within the Plan that seek to rebalance patterns of movements significantly towards more sustainable modes. Given the Council’s commitment to a 2030 net zero carbon target, and that emissions arising from transport and personal mobility are stubbornly high**, the Plan risks failing, quite catastrophically, in its duty to meet the single biggest political commitment its elected members have made, quite apart from failing to comply with much less ambitious national requirements and targets.

The new clear shift of focus and emphasis in Draft LTP is very helpful in this regard. It provides a much more secure policy basis for the District to work with the County and other stakeholders, including ourselves, on a collaborative basis, to achieve well-evidenced and well-conceived outcomes.

We continue to support the existing Strategic objectives, but only as far as they go. They show weak understanding of what is possible, and insufficient vision and ambition to avoid the perpetuation or even the acceleration of “business as usual” in terms of transport and movement.

*Strategic Objective SO1: **Sustainably accessible and connected** communities*

*Maintaining and improving accessibility to **employment**, services and amenities, **facilitated by a substantial increase in the relevance and effectiveness of sustainable modes of travel over car use, to support provision of:***

- ***High-value, low-impact economic growth affording socio-economic inclusion***
- *Affordable and quality housing for local need*
- *Healthcare for all residents*
- *Active social, leisure and recreation opportunities*
- *Youth and adult learning opportunities*

We note and support the second limb of this:

*Strategic Objective SO1a: **Healthy, inclusive and safe** communities*

*Developing communities that enable healthy lifestyles; promote social interaction; support the elderly, the young and the vulnerable; ensure public safety and reduce the fear of crime.*

**We also consider that the specific SO related to transport, movement and mobility is the most appropriate way of addressing this deficiency.** SO 4 shows no ambition at all: read at face value, it does no more than commit the Council to being some kind of marketing function for existing sustainable travel choices, rather than actively working to reshape the structure and functioning of places and their infrastructure, to *seeking* achieve radically different behaviours and outcomes.

The SO should acknowledge that while the Council needs to take an active rather than a passive stance, and that the planning system is one of the very few tools at its disposal to achieve these outcomes, this can only be done in collaboration with other parties that are empowered and able to deliver the infrastructure and services needed.

Given how far patterns of travel are dominated by journeys to work – at 17 km the District has some of the longest average journeys to work in Britain and at less than 50%, some of the lowest levels of

economic self-containment – for the Plan to be effective, and compliant with NPPF Chapter 9, the SO needs to add an explicit reference to meeting these objectives for journeys to work.

*Strategic Objective SO4: **Sustainable** transport and travel*

*~~Promoting~~ **Support the delivery of** healthier alternatives to the use of the private car and to **facilitate** the much greater use of ~~reduce CO2 emissions by using new technologies,~~ active travel, public transport and ~~for~~ smarter choices **that substantially reduce congestion and greenhouse gas emission**, working **collaboratively** towards a more integrated transport system to improve access to **employment**, local goods and services.*

## **6. Challenges to the Plan Strategy**

We have already commented on the challenges facing the District in the previous round of consultation.

The Council makes a number of statements and poses some specific questions in this consultation that warrant a further response.

### **6.1. Additional Reserve Sites**

In Para 2.26 the Council suggests that “*We may need to identify **additional reserve sites**, should the sites identified in this document not come forward at the rates envisaged, and we are interested to hear views on this.*”

This is in our view a very relevant and appropriate question.

The Council is faced with three parallel drivers bearing upon the deliverability of the development quantum, especially for housing.

The first is a near 40% uplift in the annualised rate of development, which takes effect on adoption of the Plan. This being the case, there is much less of a “stock” of permissions on previously identified sites than would be expected if the annualised quantum were to have been closer historically to the target figure. Achieving rapid rates of uplift, to sustained high levels, early in the Plan period, would be quite challenging in any event, whatever the development strategy and strategic allocations chosen.

The second is the reliance on a very small number of large sites. Both the government and the developer community concur that large sites, once they mobilise and settle into a sustained rate of output, can support higher rates of development over extended periods. However it is clear both locally and nationally, that the point at which housing output from large sites is realised involves both a substantial time lag and is relatively unpredictable. This being the case, large sites are especially prone to overly optimistic assumptions about the timing of first occupations in particular, which can easily take place five years of more after trajectory estimates. In these circumstances the trajectory rapidly collapses, opening substantial and widening housing supply deficits at a time when the need for new homes remains undiminished.

The greatest technical and commercial challenges, and the highest levels of complexity, seem proportionate to the size of the development on one hand, and whether or not the site is a stand-

alone settlement. Sites exceeding 2000 dwellings, that are also new settlements, show some of the highest levels of delivery “recidivism”. The current situation in the JCS area to the north, and in South Gloucestershire to the south, exemplifies this quite well. In the JCS area, strategic allocations of under 1500 units at Innsworth, Twigworth, South of Churchdown and Perrybrook have all now mobilised on site, albeit some years later than anticipated in the extremely optimistic trajectory. The largest and most complex West of Cheltenham and North West Cheltenham, have not. In South Gloucestershire, delivery of all but one of the largest strategic allocations made in the last plan has to date stalled. Smaller sites at Stoke Park, and Frenchay Hospital have nevertheless come forward. Current delivery has been reliant to a considerable extent on longer-standing strategic allocations at Filton North Field (Charlton Hayes) and Emersons Green East, allocation of which took place many years ago, and where delays following the 2008 recession have pushed delivery timescales substantially into the current plan’s scope.

The fundamental problems can generally be overcome at all through the application of very large amounts of government capital funding, if the issues can be resolved at all. This in itself creates a further problem given that even once funded, the capacity to delivery large and complex infrastructure schemes is nationally very stretched.

Whatever the relative merits of the strategic allocations proposed, especially at Sharpness, it is clear that commercial and technical challenges make it imprudent for the trajectory to be prone to significant slippage. Even a 2-3 year delay would involve hundreds of plots.

The third concern is the actual rate at which housing will be absorbed by the market at Sharpness PS 36 and Sharpness Docks PS35, if either site comes forward at all.

For this and other reasons, it is likely to be necessary to identify a selection of reserve sites, which, in line with the plan strategy, should be at the Tier 2 and 3a settlements. The nature of the challenges set up by the current portfolio of allocations actually leads us to the conclusion that sites that are solid candidates for this role, actually ought to be substantive allocations. One needs only to look at the situation in Mid Devon, where reserve sites in their Draft Local Plan are already needing to be called upon to meet housing needs, before their plan is formally adopted, and the Inspector’s report recommended these sites became substantive allocations.

## **6.2. Transport Impacts and Improvements**

The cumulative impact of a substantial increase in population and activity not just within the Plan area but adjacent areas, is a very significant issue, and one that is far from being appropriately highlighted in the plan itself, or the evidence base. It is, however, picked up in the Sustainability Appraisal at paragraph 6.77: *“As a whole, the development in the District and that in the surrounding areas, is likely to result in an increase in the number of trips being made regularly to commute or meet other local needs. As such, there is potential for both the minor negative effect and minor positive effect identified in relation to SA objective 10: air quality and SA objective 14: climate change to be increased to significant.”*

While some very limited modelling work has been done in SATURN to support the initial Regulation 18 consultation, there is no more substantial evidence base to help the Council, the County Highways Authority or indeed any other party, understand what the range of potential traffic

impacts is likely to be, dependent on arrangement of scenarios and subject to further more detailed work understanding trip assignment. 2011 Census data is now almost a decade out-of-date. The housing market, as well as spatial patterns of employment and the nature of the housing market, have significantly evolved in this period. In any case, it is not appropriate to assume that patterns of travel associated with house purchase decisions made historically, perhaps up to 30 years ago, will closely replicate those that are being made now or that will be made in the near future.

As is made clear in the STS and the SA Report, as well as alluded to in the Plan itself, Stroud District has extremely low levels of self-containment for employment trips, with over half of such journeys leaving the District entirely. This doesn't just relate to the immediate proximity of Gloucester, whose functional built up area extends into the District at Hunts Grove and Hardwicke, and at Coopers Edge and Upton St Leonards east of the M5. The average 17 km commute for residents – an extremely long distance for this region – highlights large and no doubt increasing numbers of journeys exiting the District to the south and east. The limited rail service, and the even more limited number of stations, especially on the line to Bristol, mean that provide credible alternatives to car trips for these journeys, is an extremely important challenge to resolve, not only to deliver sustainable new development, but to meaningfully address exceptionally high levels of existing car dependence, this is essential if the Council wishes to meet its wider sustainable development goals.

The existing capacity of both the local and national highways network to accommodate current demands is clearly becoming challenged. It is the congestion, delay and unreliability that arises from this that is the single biggest threat to the sustainability of our existing bus services in the area and beyond: a point we must raise, loudly and often.

Para 2.27 of the Draft Local Plan indicates that such capacity headroom that does exist is very modest and incapable of accommodating future demands. As a result, *“Initial transport work has identified the likely need for major improvements at M5 junctions 12, 13 and 14, together with improvements along the A419 and A38 corridors. These improvements are likely to be required whatever the pattern of growth envisaged. Larger sites have more potential to help fund major infrastructure schemes and are more likely to attract public funding.”*

We have already separately indicated in rather more detail to both Councils what the existing bottlenecks are, that cause disproportionate delay and disruption to the reliable operation of public transport. They also cause by far the most serious problems in terms of localised air quality. The Plan, and the emerging LTP, would do well to start to address these known issues beyond acknowledging problems in general terms. There is no indication on the part of any stakeholder of what the Councils are seeking to achieve in terms of network reliability, and delay, much less a target to reduce single-occupancy car journeys.

This is typical of the conceptual and strategic weakness of policy within local plans in England. That the current review seeks to perpetuate the general but essentially undefined aspirations, without actively looking to identify and delivery means of addressing them, is very disappointing, especially given the scale of the known problems, and the Council's stated attempt to go further and faster than almost any other governmental body in the world, to achieve net zero carbon emissions.

There is no clearly stated ambition for public transport, nor clearly-stated strategic goals, related to the clearly expressed main movement corridors that are a key and enduring feature of the District.

First the canals, then the railway, and now the main highways and bus routes follow the same broad overall pattern, which is a function of the very distinctive physical geography of the District.

If there is to be a significant shift towards more sustainable lower-carbon modes, and public transport in particular, then it is these corridors that must be targeted to deliver:

- Higher service frequencies: at least every 30 minutes, and ideally double that on key corridors;
- Improved timetable coverage, with regular evening and Sunday services, but also earlier morning departures on core corridors;
- Much faster journey times overall, with end-to-end running times from major origins (including the strategic allocations) to key destinations - ideally under 45 minutes;
- Achieving bus productivity and reliability at peak times that is the same as off-peak, through the use of corridor-wide approaches to bus advantage and priority.
- The highest standard of bus stops and roadside infrastructure, complementing seamless digital strategies and off-bus ticketing and payment being rolled out by companies including ourselves

The statements in the draft plan are very much more vague and anodyne. Para 2.28 states in very general terms that *“Improvements to public transport will need to include increasing rail and bus services along main transport corridors and improvements to interchanges and to Cam & Dursley rail station.”*

The Plan, reflecting the current LTP, only starts showing any really specific ambition and intent when it comes to the railway: *“The Council continues to support the provision of an additional rail station on the Bristol-Birmingham main line. Sites at Bristol Road, Stonehouse and Hunts Grove, Haresfield are safeguarded in the current Local Plan for this purpose.”* Ironically, it is these specific projects that remain, after over a decade, no more than aspirations, rather than demonstrably deliverable infrastructure schemes.

We remain fully committed to engage with both councils to help sharpen up the vision for transport, and high quality bus and coach services in particular, and then help define specific interventions, with robust specification of outputs and costs, to create the framework for both the plan strategy and its required mitigations, and to give all stakeholders confidence the Plan is deliverable. This cannot simply be achieved simply by us attending an occasional multi-stakeholder workshop. The matters involved are substantial and will involve this or any other operator assuming potentially very significant commercial risks.

We would separately advise that we will need to substantially invest in expanded operational support facilities, including, in all probability a new depot, to substantially increase our operating mileage in the district and beyond to support the plan’s growth agenda. Such substantial capital investment needs a considerable amount of certainty that business case assumptions can be met. A suitably ambitious, clear and robust LTP and Local Plan policy suite will be essential to helping justify such a business case. Currently, neither plan gives us the requisite level of confidence.

### **6.3. Gloucester City’s unmet needs**



There has, for many years, been a difficult tension across the Gloucester-Stroud boundary. Two successive Local Plan reviews have made strategic allocations – the largest in either plan – directly adjacent to the City, at Coopers Edge (former Gloucester Trading Estate) south of Brockworth, and at Hunts Grove in Hardwicke Parish. Delivering housing within the District directly adjoining the City certainly is a highly sustainable strategy in principle. Indeed both these developments also benefit from being directly adjoining not just services and facilities, but some of the largest employment areas in the whole County, easily accessible by walking and cycling.

The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy preparation and examination exposed the degree to which the City has grown up to its boundaries. The unusually direct recommendations of the JCS Inspector regarding both Hardwicke Green (Draft allocation G1) and Whaddon (Draft Allocation G2) flowed out from the evidence presented at that Examination.

We note that the Council is taking the view that, despite the recently rehearsed evidence, Gloucester City will in some way in the immediate future, be presented with alternative potential directions that demonstrably would more sustainably accommodate the City's unmet needs, as part of the Review of the JCS that has just started. Accordingly, until the site are re-evaluated against other options in Tewkesbury Borough and Forest of Dean Districts, the Council will make no commitment to allocate either or any site to address this issue. Given that the JCS is at least a year behind the Stroud Local Plan Review, and probably further, it is very hard to envisage that any such evaluation will have been completed, leading to a renewed request from the City, at any stage before the final pre-submission Stroud Local Plan is published.

Stagecoach notes and welcomes the acknowledgement at Para 2.32 that the District is holding open the potential to allocate land at Whaddon to meet Gloucester's unmet need: *"At this stage, pending further work on the Joint Core Strategy Review, a site at Whaddon is safeguarded in the Draft Plan to contribute to meeting Gloucester's needs. Further work is required with our neighbours before the Local Plan is finalised to agree how Gloucester's unmet needs will be accommodated in full."*

The other site evaluated to meet unmet needs arising in Gloucester proposed allocation G1 South of Hardwicke ("Hardwicke Green") had not been included in the original draft of this plan for consultation. It has now been added, at a late stage. However we note that Hardwicke is proposed to meet the District's own endogenous needs, while Whaddon is, in effect, being considered as a reserve site should it be required to meet Gloucester's needs, but alternatively, in the same way, might also be brought forward to meet the District's own.

It should be noted that the strategic allocation at Hunts Grove, Hardwicke, accounting for up to 2500 dwellings if the existing commitment and the re-confirmed allocation are taken together, is to meet the District's needs, not make any contribution to meeting Gloucester's.

This creates a situation where, should all this quantum ultimately be allocated in the Plan, as many as 7000 new homes directly adjacent to the Gloucester urban area would have been provided between 2011 and the plan horizon date of 2041.

We must stress that we stand by a view that all these sites are, broadly, amongst the most sustainable options for housing within the Plan area.

This might then lead to a view being formed that the matter is in some way, wholly academic. However this would be erroneous. If these relatively sustainable locations on the edge of the City, very well related to existing employment and services as well as future jobs growth, are drawn down to meet the assessed needs arising within Stroud, this simultaneously sets up two problems.

First this would represent an unbalanced spatial delivery of new homes to meet the District's OAN. The new allocations would deliver at least 4450 additional homes adjoining the city. This represents somewhat over a third of the entire housing need of the District over the period, while, across a broad swathes of the District, there would effectively no delivery to speak of, such as in the Wootton cluster. The amount of development well related to Stroud, the largest settlement by far - and its closely related Tier 2 settlement of Stonehouse – would also be disproportionately low. The high level of physical and landscape constraints around Stroud in no way diminishes the housing needs arising from it, that ought to be met in reasonably close proximity, for economic and social as well as environmental reasons.

Second, the unmet need from Gloucester needs to be accommodated elsewhere beyond the City's boundaries: the requirement does not "go away". This is likely to be on sites that, given the known physical and other constraints affecting the JCS area, are likely to be well beyond the existing edge of the City, and considerably more challenging to integrate sustainably with the City than either Whaddon and Hardwicke Green. Indeed, in such a scenario, it would be ironic indeed, if screening of options across Stroud, the Forest of Dean and Tewkesbury, indicated that a new or expanded community south of the City in the Whitminster area were among the most sustainable remaining options, as indeed such an exercise might well, in our view.

We are consistent in holding a view that housing need should as far as possible be met closest to where such need arises. While we support both draft allocations, on the grounds of their inherent sustainability, we therefore doubt that the current approach to meeting identified unmet need from Gloucester is sufficiently justified or appropriate.

#### **6.4. Cross boundary interaction with South Gloucestershire and the West of England**

Para 2.34 of the Draft Plan states that: *"Growth and infrastructure improvements beyond Stroud District, but near to settlements in Stroud District, may have an impact on the final Local Plan. At this stage, the strategy for the south of the District (including growth and infill within settlements at Berkeley, Cam, Dursley, Kingswood, Newtown/Sharpness, Wisloe and Wotton-under-Edge) will require improvements to M5 Junction 14, but may also benefit from public transport and other planned improvements to services and facilities within this wider area."*

It is evident from a variety of data sources, as well as some of the evidence base behind the plan, that the functional interaction of the southernmost part of the District with the west of England is strong and, if anything, growing. This is true of the Wootton and Berkeley clusters, but also for Cam and Dursley. We note the trip assignment assumptions in the proposals for Sharpness Vale, which indicate an expectation that destinations in the West of England will dominate.

The Joint Spatial Plan for the West of England has now been formally withdrawn by South Gloucestershire Council (SGC), as well as the other participants, following the evaluation of it made by the Planning Inspectorate. While proposals at a strategic scale just south of the county boundary

at Charfield and at Buckover no longer have any formal planning policy status, it remains the case that meeting SGC's housing needs in the short term, may well require further releases of land outside the plan-led system, and given statutory Green Belt constraints, there remains prospects of further development coming forward, in the foreseeable future, immediately to the south of the District, albeit likely to be on a non-strategic scale. We have signalled to SGC and SDC, as well as other stakeholders such as highways England, that there is already sufficiently strong grounds to believe that a substantial uplift in public transport frequency and connectivity can be delivered alongside new development between M5 junction 16 and this area, alongside new development, to offer a credible and sufficiently attractive choice to be effective.

This is clearly highly relevant to addressing the current transport challenges in the Wootton cluster, and at M5 junction 14. Notwithstanding an agreed position regarding the comprehensive upgrade of this junction in due course, there is a need to provide the best possible public transport offer across the wider corridor, to mitigate the traffic impacts of committed as well as potential further releases in the shorter term. We have previously agreed a package of measures to upgrade the entire Wootton-Kingswood-Charfield corridor towards Thornbury and beyond, to a half-hourly frequency at least as far as Kingswood, with the potential to extend hourly from Kingswood to both Wootton under Edge and Yate. Over 300 new homes are committed or recently delivered in Charfield alone, to which a further application for 250 is on the point of being registered by SGC on land adjoining the district north of Wootton Road. This is reflected in the evidence base for the withdrawn JSP.

We have made previous clear representations on the nature of the cross-boundary opportunities in this area, including Kingswood in particular. We are now apprised that primary school capacity is identified as the biggest single constraint on any growth in the cluster.

However, we also note that the remaining elements of a very substantial employment consent, expanding the headquarters of Renishaw plc is now well underway. In addition to this, the Council is now proposing a further 10Ha to the west for further employment growth. The expansion to this already substantial campus, folding in a smaller existing site within SGC in Charfield, would allow substantial consolidation of the business from numerous smaller locations as well as growth.

Since it is likely that the primary school capacity could be resolved with the allocation of a proportionate level of growth, the proposed employment allocation at New Mills would complement and indeed help support the development of a smaller-scale focus of residential growth meeting the existing and future housing needs in the Wootton cluster, that clearly cannot be appropriately and sustainably met in Wootton itself, given the physical and landscape constraints on the town.

We have also signalled clearly the opportunities to provide a step change in the public transport offer between Dursley/Cam, and the south along the A38 and/or the M5. We note and welcome that these comments have been picked up in the Sustainable Transport Strategy. The focus of growth at Cam and Wisloe can take advantage of both the rail offer, but a road-based solution towards Aztec west and this part of the Northern Fringe, which is not rail-served, is likely to be essential is a comprehensive public transport offer is to be provided to and from these proposed allocations.

## 7. The Preferred Development Strategy

Stagecoach has always expected that the ultimate strategy that would be likely to be taken forward would involve a hybrid approach to some extent.

We welcome the intention stated in the Plan at section 2, as to what the Strategy intends to secure.

*2.12 “The strategy supports the development of inclusive, diverse communities, with housing and employment in close proximity and good access to wider services and facilities, to reduce our carbon footprint and to improve the District’s sustainability and self-containment.”*

If the strategy were to be demonstrably achieved this across the entire suite of policy and allocations we would have no doubt that this would represent an appropriate strategy, when tested against reasonable alternatives.

In fact, **in the main, notwithstanding how it has been arrived at, we strongly support the broad approach of the spatial strategy.** Examining the allocations and the evidence base for these we recognise that much of our prior input has been recognised in parts of the evidence base, especially the Sustainable Transport Strategy, and it is mirrored by the evidence coming before the Council from its own work, and through other parties.

We believe that the broad approach, to seek to allocate land for employment and housing following a “cascade” process starting with appropriate locations within the Tier 1 and Tier 2 settlements, then adjoining Tier 1 and Tier 2 settlements, before looking at new and expanded settlements in sustainable locations, is absolutely the correct one. We have been consistent in expressing such a view to the Council.

Therefore, the identified strategic allocations in Policy CP2 are, with two exceptions, considered to be exactly those that should be looked at, not least having regard to a deep analysis of the data behind much of the evidence base, and arriving at a rational disposition of land uses, that among manifold other considerations being weighed by the Council and covered in the Sustainability Appraisal Report.

Our strong concerns arise in the approach taken to identify appropriate locations for that quantum that simply cannot be accommodated within and adjoining the Tier 1 and Tier 2 settlements. Given the existing and likely future transport related challenges, that immediately apply as soon as the need for a more widely distributed approach is unavoidable, **we have urged the Council to focus on a “corridor” approach, that allows the strategy to be anchored to existing and potential high quality public transport corridors. This is exactly the same conclusion reached latterly by the Councils own Consultants, in the Sustainable Transport Strategy published alongside this consultation.**

Focusing development on a small number of key Sustainable Movement Corridors defined within the STS in this way, retains as far as possible the ability to site development in the closest possible proximity to existing and future activity and population, while ensuring that the credible choice of modes is available. In Stroud District, where the public transport offer is quite sparse, this also serves to create the density of demand that could catalyse an unprecedented increase in the use of sustainable modes of all kinds. By looking at developing the key A38 Sustainable Movement Corridor

highlighted by the Council's STS, and a subordinate arm to Wootton via Kingswood, direct, frequent and efficient bus and coach services could be provided, use of which by both existing and new residents could be leveraged to secure the fullest possible use of public transport, walking and cycling, as NPPF paragraph 102-103 intends.

Looking dispassionately at the evidence base now published by the Council, and in line with our own views and analysis summarised in the rationale above, there seems to be a particularly strong case for growth at two settlements, which stand out among all the other third tier settlements. This potential is explicitly highlighted in the Draft Plan itself at paragraph 2.16:

*"These (Kingswood, Whitminster) are villages that have a range of local facilities and already benefit from good transport links, or they have the potential to develop better transport links to strategic facilities at the nearby towns of Stroud and Wotton-under-Edge, where growth potential is limited by environmental constraints."*

To this we would add that Whitminster is also relatively close to Gloucester, and offers the immediate prospect of direct, frequent and relatively fast public transport journeys both to there and Stonehouse and Gloucester. The settlement lies directly on the Sustainable Movement Corridor of the A38.

We also would highlight the fact that the conclusion above with respect to Kingswood is drawn by the Council, despite the fact that the presence of the secondary school and leisure facilities is entirely overlooked. Equally, the Council places no weight, it seems, on the plans own draft allocation of 10 ha of further employment, consolidating the already substantial employment complex at New Mills within the Parish and a little over 1km from the edge of the village.

In terms of the spatial strategy, this potential is all but entirely overlooked, in favour of the expansion of Sharpness Docks (where there is virtually no pre-existing community) and a new/expanded community focussed on Sharpness/Newtown. These sites depart entirely from what is set out in the evidence base, not least, they are the only draft strategic allocations that lie well adrift of the Sustainable Movement Corridors in the STS, which should be the focus for growth. Here the Strategy purports to take advantage of *"the opportunity to transform local transport facilities through a new rail station with services to Gloucester and rapid bus services to main towns including Bristol;"* to create a large new settlement that, at full build-out beyond the Plan period, would actually become the District's second largest town. As we point out at length elsewhere in our representations, this potential is illusory. As one of the UK's largest public transport providers, both of bus, coach and rail services, we would re-state once again, unequivocally, that we see absolutely no realistic prospect of relevant public transport services by road or rail being deliverable to this area during the plan period. It is important to note that the promoter of the new settlement, in their latest submissions to the Council published with the consultation, entirely concur with this analysis.

This arises from the fundamental limitations of a new settlement in a location which, as the former presence of a nuclear power station testifies, is as remote as possible from major infrastructure and significant centres of population and economic activity, and lies well off-line of any existing or potential high-quality public transport corridor. The identification of this site, and its fundamental perceived underpinning virtue, is the abandoned freight branch line, reinstatement of which for passenger services is something that poses very substantial practical difficulties, especially when the

nature and operational requirements of the wider rail system in the District and beyond are considered. The promoter now appears to place no reliance on this for the delivery of 2400 homes in this location by 2041. It is important to note that a further allocation of 300 homes at Sharpness Docks, carried over from the current plan, has been the subject of two historic applications, but has not been advanced.

**We strongly support the other proposed new settlement at Wisloe Green.** This contrasts entirely with Sharpness, in terms of its scale, and its location. It is a new garden village of 1500 dwellings scope lying directly on the existing A38 and A4135 junction, amongst the most important nodes in the identified Sustainable Movement Corridors system highlighted in the STS and thus the existing and future high-quality bus and coach network, that would directly link Gloucester and Stonehouse with Cam and Dursley. The plan also signals the unique opportunity to provide longer-distance journeys sustainably, arising from the potential to make use of the only station in the District on the Bristol-Birmingham Main Line: Wisloe Green offers *“the opportunity to improve access to Cam & Dursley rail station and to local facilities for existing residents and businesses whilst protecting the setting of existing villages.”* (para 2.26) By virtue of its quite close proximity to Cam and Dursley, many day-to-day journeys out of the settlement could also credibly made by cycling, given the potential to extend an attractive off-road dedicated facility a little further west. **Compared with most of the other options, Wisloe represents a singular opportunity to plan for low-carbon, active lifestyles, in a relatively otherwise unconstrained location.**

Rather than pursue a “dead end” option at Sharpness, the wider deliverability of which must also be considered immensely challenging, we urge the Council to return to the core logic set out in its own evidence base: to examine the case for growth at the most sustainably located Tier 3a settlements, alongside the identified Sustainable Movement Corridors, where these demonstrably can meet the requirements set out at Paragraph 102-103 of the NPPF 2019.

**It is only in these locations that Stagecoach can confidently commit to delivering the step change in the attractiveness and relevance of public transport necessary to drive the delivery of the Strategic objectives of the Plan.**

Following from this, we believe that Land East of Whitminster could offer the opportunity for development of a new or expanded village-scale community on a similar model to that at Wisloe, while also accommodating 15 Ha of employment on a site that also accord entirely with the spatial strategy.

We also believe that Kingswood warrants significant and detailed attention, albeit to accommodate growth on a rather more modest scale, but sufficient to ensure that existing local infrastructure deficits, in particular primary school provision, can be tackled, while also transforming the availability and attractiveness of public transport from the village and the wider area.

Two strategic allocations are proposed related to the urban fringe of Gloucester. We acknowledge and understand the significant ongoing issues arising from the inability of the City of Gloucester to accommodate the housing needs arising within its own boundaries. We support the allocation of both. We cover the issue of what housing need these sites ought to address in or comments at page 33 above. **The Strategic Allocations**

We **strongly support** all but two of the strategic allocations identified to meet the objectively-assessed development needs of the District to 2041 set out in Policies CP2 and CP3.

Can North West 700 dwellings – **support**.

Cam North East Extension 180 dwellings – **support**.

South of Hardwicke 1200 dwellings – **support**.

Hunts Grove Extension 750 dwellings – **support**.

Sharpness Docks 300 dwellings – **do not support**.

Sharpness/Newtown 2400 dwellings – **do not support**.

Stonehouse North West 650 dwellings – **support**.

Wisloe Garden Settlement 1500 dwellings – **support**.

We over the reasons for this in our commentary each of the potential strategic allocations, that follows.

We note and welcome that, both through strategic allocations and through other supporting policy the Strategy seeks to achieve *“managed growth at each settlement, through a combination of site allocations and a policy framework that identifies an appropriate overall scale of growth, to be delivered through windfalls and other exceptions.”* However the key for us, is that the scale of growth identified and deliverable is indeed appropriate, reflecting the contribution of the resulting distribution to achieving a spatial strategy that concentrates development in those places that are, or can be made sustainable, not least in terms of providing a credible choice of modes to meet a large proportion of travel needs, as NPPF requires at paragraph 102-103. It is essential that such an approach does not in its effect, amount to an extreme dispersal policy, with cumulatively significant amounts of housing being delivered in a very large number of small settlements that would only substantially compound existing problems of car dependence.

We have been consistent that for the larger and more sustainable settlements, and especially those on identifiable existing and potential public transport corridors, there should be a more flexible approach to meeting development needs within certain parameters. Depending on how such parameters were set, this might also provide some scope to adding resilience to the housing trajectory, rather than specific reserve allocations. For example, if a half-hourly bus service is provided to at least one Tier 1 or 2 centre (or equivalent outside the District) reachable within 25 minutes this might present a criterion allowing a Tier 3a or 3b settlement to accommodate additional homes up to a fixed proportion of those existing, or alternatively, a notional growth ceiling.

Away from such locations, a much more restrictive approach is warranted. We recognise though that settlement of all size must be allowed to appropriately evolve, and blanket development ban in smaller settlements risks undermining their vitality and demographic balance over the plan period.

We note that the plan will continue to support smaller-scale windfall sites within settlement limits, as described in paragraph 2.49: *“Other housing proposals will be supported, in accordance with the Draft Plan’s settlement hierarchy, within settlement development limits and, in specifically defined policy cases, outside of settlement development limits. These additional elements of supply will deliver levels of housing growth above the minimum requirement, providing for flexibility and headroom.”* We support this broad approach, and agree that this is likely to achieve the effects intended.

This is established in draft policy CP3, which establishes, with helpful graphics, a graduated approach related to the categorisation of the settlement.

This of course assumes that the settlement category adequately reflects its innate sustainability, something that we question, having looked at the evidence in some depth. The relative ability of tier 3 settlements to meet travel needs without recourse to a car is especially poorly understood in our analysis, as discussed in our sections concerning the Plan’s evidence base, and thus the suitability of some settlements to accommodate growth without giving rise to further extreme car-dependency is either significantly over- or under-played.

We would also caution strongly against a blanket assumption that the smallest Tier 4 settlements could accommodate up to a 10% growth over the plan period, across the District, without creating a significant exacerbation of car-dependency and accompanying pressure on highways capacity.

It is also perverse that the most permissive approach to social rent housing is effectively focused on the smallest and least sustainable settlements. These have the fewest opportunities for employment and demand car use for each active member of the household to participate to any meaningful extent in wider society. We would strongly urge rural exceptions sites to be concentrated in Tier 3 settlements alone, minimising the likelihood of exacerbating wider social and economic exclusion. In fact, the most appropriate solution would be to rely on a suitably balanced spatial distribution of site allocations across the District, which ought to provide for adequate affordable housing within reasonable reach of existing family and job connections, without leading to a quite extreme dispersal of affordable housing provision.

This logic again would support a better balance of allocations in the south and central part of the District, at Tier 3a settlements including Kings Stanley, Whitminster and Kingswood, where significant likely improvements in public transport can be envisaged.

## **8. Local Economy and Jobs**

Stagecoach notes and welcomes the recognition that the current availability and distribution of employment has significant transport and accessibility implications, at paragraph 2.56 of the draft Plan: *“There is considerable out-commuting to work, which presents a big challenge if we are to reduce our District’s carbon footprint: as a rural district, many people are car-dependent, so we also need to ensure that access to jobs, services and facilities can be improved in the future and our chosen strategy must enable more sustainable forms of transport to be used.”*

We **support** all of the standalone employment allocations, each of which relate well to the existing and potential access and movement corridors identifiable within the District. This includes the new employment allocation added to this Preferred Strategy draft, of 10Ha at New Mills, in Kingswood,



which relates well to an emergent high quality bus corridor between Wootton and M5 j14, thereafter south towards Thornbury and Bristol.

This is equally true where strategic mixed use allocations, such as at Wisloe Green Garden Village relate well to these corridors, as most do.

#### ***Quedgeley East Extension 5 ha***

We support this allocation which is a logical rounding out of the current site and the commitment under construction by St Modwen. The site extends away from the B4008 and the current main Stonehouse-Quedgeley bus corridor, which will be retained in some form, and is likely to retain a half-hourly frequency if the whole network is augmented as the Plan seems to envisage.

However the opportunity exists for the bus route to run through the site to Haresfield Lane, crossing the M5 on the existing overbridge to link directly to the Hunts Grove Spine Road. This may offer scope for mode filtering in favour of sustainable modes, to prevent rat-running, and could provide an attractive bus route, if properly aligned. It is important that such an opportunity is fully explored and taken up. This proximity to Quedgeley and Kingsway is also a strong basis for its sustainability as cycling and walking represent a credible choice from substantial residential areas, damping demand for car use.

The consolidation of employment uses in this area and at Javelin Park is helpful to creating a critical mass of demands for bus services.

#### ***Javelin Park 9 ha***

We **support** this allocation. The comments we make above for Quedgeley East apply to a great extent to this site also, though the penetration of the site by bus services is clearly not appropriate or feasible.

#### ***Sharpness Docks 7 ha***

While some allocation to support existing port activity and existing employer may be justified, **we do not support** the allocation in principle. The site is all but entirely car-dependent and there is no credible scope to provide relevant and attractive public transport choices to this highly isolated location, which relates entirely to the historic operational requirements of the Ship Canal.

#### ***Sharpness 10 ha***

This allocation is made as part of the mixed use proposals at Sharpness Vale, which **we do not support**, for reasons outlined in depth elsewhere.

#### ***Stonehouse North West 5 ha***

This allocation relates to the larger residential-led mixed use proposals at Stonehouse North West, which we **support**. We cover our site specific commentary under the residential allocations.

#### ***Stonehouse Eco-Park (M5 J13) 10 ha***

We **support** this allocation, which lies adjoining an already committed public transport enhancement covering the wider area West of Stonehouse. Therefore, a baseline level of service in the short term is already assured.

We note that an outline application (S.2016/0043/OUT) for a wider area of land north of the A419 in this location, under the same promoter's control, has now received a resolution to grant permission for a Football Stadium and associated uses, which might be called in by the Secretary of State and recovered for his decision. It is not entirely clear to us if the proposed allocation relates to this site or land south of the A419.

By virtue of its location and the scale of proposed parking facilities the Stadium, if implemented, creates some potentially significant opportunities to achieve bus and coach interchange, including important potential to create some kind of "Coachway" operation, consolidating flows on the SRN onto inter-urban and longer-distance coach services. Whatever the ultimate mix of uses that emerges in this location, we urge that this potential is further explored and understood, and that the opportunities identified are secured through the Plan.

This is likely to involve a significant amount of collaborative work with the County Council and Highways England, as well as other long-distance coach operators, including Megabus.

#### ***Wisloe 5 ha***

This allocation relates to the larger residential-led mixed use proposals at Wilsoe Green, which we **support**. We cover our site specific commentary under the residential allocations.

#### ***Renishaw New Mills 10 ha***

Stagecoach recognises that Renishaw plc is one of the most important and well-established members of the economic ecology of the County and the District. It is an innovation and technology-led company, of vital importance to the prosperity of the wider UK economy. Its established headquarters is at Kingswood on a campus site that has seen steady planned expansion, which is ongoing. This is reflected in a further application for about 11,000 sqm of additional office space, which represents a reconfiguration of the balance of a previous planning commitment.

We note a further 10Ha to the west of the New Mills site has been proposed for allocation. This would consolidate an already important employment and innovation cluster. We understand that this is intended, less for Renishaw's own use, but to facilitate the co-location of a wider constellation of similar technology and knowledge intensive organisations and businesses, that can mutually support and draw on each other's expertise.

The site is directly on an emergent Sustainable Movement Corridor we highlight elsewhere in this response, between Wootton and Thornbury via Charfield. We have already committed, subject to pump-priming funding being released, to providing a 30-minute frequency along this corridor, and potentially directly to Bristol Northern Fringe, associated with an imminent planning application in Charfield for up to 250 dwellings.

The site is within reach of both Charfield and Kingswood by sustainable modes, at least in terms of close proximity. We have no doubt that substantial improvement not just of public transport, but

walking and cycling links, would be provided both by this promoter, and also, potentially associated with an appropriate quantum of new housing west of Kingswood, an opportunity we also highlight.

The strong potential complementarity of this allocation with a radically more sustainable pattern of travel, means that **we support this allocation.**

## 9. Core Policies

We comment here on the notable aspects of the main Core Policies, to the degree that we haven't already done so.

The most significant shift is the addition of the new Policy DCP1. This sets a whole new tone, with which the rest of the Plan and its strategy needs to be much closer in conformity, which we outline at length in our commentary elsewhere in this response. Otherwise the Draft Policy can only be ineffective, and thus unsound in planning terms. We have a real concern that the Council has yet to fully understand the implications of its own policy position in DCP for planning. Bolting such a Policy on to a Plan that is quite agnostic about transport, in most regards, risks a clear deficit in credibility opening up in this area in particular as the Plan progresses to examination.

For this reason we trust that the Council will consider our wider representations very carefully.

We suggest that the implications of the accelerated journey to net zero carbon are much more clearly spelled out in this policy as follows, to establish the basis for its effectiveness, and that of the wider strategy and Policy suite:

*“DCP1 Stroud District will become Carbon Neutral by 2030 ahead of the Government target of net Zero Carbon 2050. To support this target all new development must be:*

- *located where the form and mix of development itself or proximity to essential services and facilities minimises the need to travel;*
- *designed to discourage the use of the private car, irrespective of fuel source, by prioritising in order of importance: walking, cycling and public transport to deliver **the highest possible share of trips by the most sustainable travel modes;***
- *...”*

We **support** the Council's commitment to plan positively for the objectively assessed needs of the District in Policy DCP2:

*“DCP2 Strategic Growth and Development Locations*

*Stroud District will accommodate at least 12,800 additional dwellings, 650 additional care home bedspaces and at least 50 hectares of additional employment land to meet the needs of the District for the period 2020-2040.”*

We set out above, in our analysis of the evidence base, why we have significant concerns about the manner and categorisation of the settlements in the District, particularly at Tiers 2 and 3. We believe that this categorisation does not consistently follow from the evidence.

We are the view that the settlements highlighted present significantly more opportunities for the use of sustainable transport modes than the other settlements in Tier 3a, while the others, in many cases, represent localities that cannot realistically accommodate any development without that development being fundamentally and unavoidably car-dependent.

We also disagree that the evidence shows that all these Tier 3a settlements are in any way equally constrained in their capacity to accommodate an appropriate level of growth. This part of the policy is unjustified by evidence. Those directly on the Sustainable Movement Corridors identified in the evidence base clearly are likely to represent much more appropriate locations for growth, including some on a more strategic scale, than those that are not. Thus we suggest that Tier 3a is split into two sub-tiers, with the existing tier 3b reviewed entirely to become Tier 4, with a decision then to be made if this then leads to sub-tiers within category 4 or a reversion to a Category 5.

#### *DCP3 Settlement Hierarchy*

##### *Tier 3a - Accessible Settlements with Local Facilities*

~~Hardwicke, Chalford, Manor Village (Bussage), Brimscombe & Thrupp, Eastington, Kings Stanley, Leonard Stanley, Frampton on Severn, Newtown & Sharpness, Kingswood, Whitminster, North Woodchester~~

##### **Tier 3b – Settlements with local facilities:**

**Chalford, Manor Village (Bussage), Brimscombe & Thrupp, Eastington, Leonard Stanley, Frampton on Severn, Newtown & Sharpness**

~~“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. They greatly vary in ntheir ability to benefit from existing or potentially high quality links by sustainable transport. Tier 3a settlements These villages benefit from their existing and potential proximity and/or connectivity to higher tier settlements or transport corridors, which enables access to employment and key services and facilities elsewhere. Tier 3b settlements do not offer this scope. ...Accordingly some of these Tier 3a and 3b settlements outside the AONB may are likely to offer some have scope to help meet the housing needs of more constrained Tier 1 or Tier 2 settlements. However, their scope appropriateness to accommodate for future growth (in addition to any sites already allocated in this Plan) is constrained. variable, and dependent on several factors, including their ability to support much more sustainable patterns of travel.”~~

Stagecoach notes and broadly **supports** the content of Draft Policy CP5. We support a focused change:

#### *CP5 Sustainable Development Principles for Strategic Sites*

*“Strategic sites will:*

*1. Be built at an appropriate density that is acceptable in townscape, local environment, character and amenity terms*

*2. Be low impact in terms of the environment and the use of resources*

*3. Be readily accessible by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities; and will contribute towards the provision of new sustainable transport infrastructure to serve the area, in seeking to minimise the number and distance of single purpose journeys by private cars, **and maximise the use of sustainable modes.***

*4. Have a layout, access, parking, landscaping and community facilities in accordance with an approved indicative masterplan*

*5. Be located to achieve a sustainable form of development and/or support regeneration. Development proposals should incorporate a negotiated design code/framework.”*

We note there is no change to existing policy DCP6 Developer Contributions.

## **10. Concluding Comments**

We trust that the Council, stakeholders and the wider community recognise from the depth and breadth of this response that we have a very deep interest and concern in the District, and that we believe that bus and coach services can and should play a much greater role in supporting sustainable economic activity and lifestyles than they are able to today.

Faced with the twin goals of accommodating an unprecedented level of development within the District, and the need to move as rapidly as possible towards a greatly more sustainable future, we applaud the Council's efforts to date with the Local Plan Review.

We would reiterate our strong desire and our on-going commitment to work as constructively as possible with the Council and its other partners to formulate the best possible strategy for the sustainable development of the District, and then, more importantly thereafter, to deliver it.