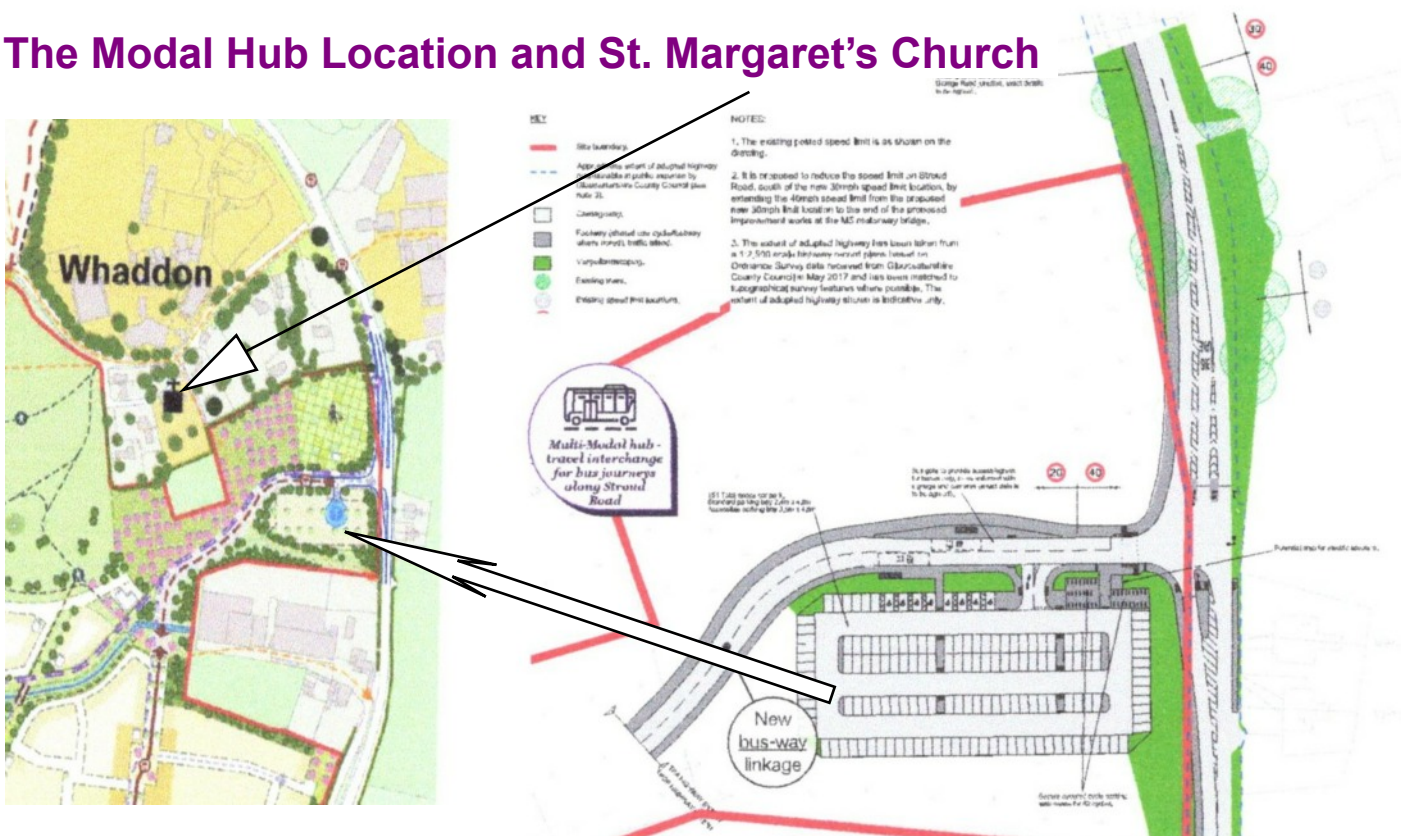


# Brookthorpe-with-Whaddon Parish Council



## Objections to Planning Application S.23/2428/OUT

### The Modal Hub Location and St. Margaret's Church





## Timeline:

10<sup>th</sup> January 1955 - St. Margaret's listed as Grade II\*

This provides the Church with the same listing as Battersea Power Station and the London Coliseum being a Grade applying to only about 8% of listed buildings.

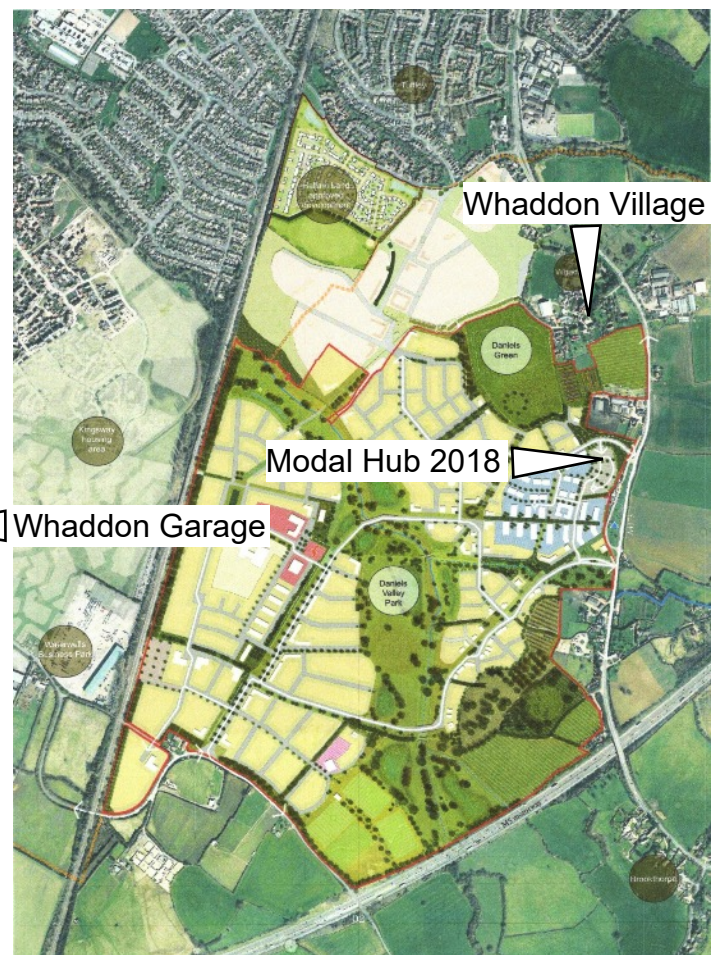
May 2017 - SDC SALA Heritage Impact Assessment

To prevent impact on the setting of the listed buildings it is proposed an adequate buffer from Grange Road on BRO 004 and up to half of BRO 003 from Church Lane to Brook Farm.

Heritage England commented on the 17<sup>th</sup> February 2023 that this did recognise the considerable harm to the significance of St. Margaret's.

August 2018 - Taylor Wimpey Vision for Whaddon

This shows the Modal Hub to the rear of Whaddon Garage with two entrances onto Stroud Road.



## October 2020 - EDP Heritage Impact Assessment for LQ Estates

“In assessing the setting of the Church of St. Margaret and the contribution that it’s setting makes to it’s significance as a designated heritage asset, it is considered that those elements of the church’s setting which make the greatest contribution to significance are:

- .....
- the view south from within the churchyard across the predominantly rural landscape towards the Cotswold Escarpment...”

The Modal Hub is shown in the Planning Application on land to the south of St. Margaret’s Church.

## August 2022 - SOCG SDC and Promoters

“Whilst the promoters agree with a primary vehicular access from the A4173 and additional vehicular access from Grange Road, with necessary improvements to the existing highway network, the objection remains that the plan should indicate 3 points of access along Stroud Road. A northerly access point which will serve the new modal interchange is omitted, contrary to previous submissions and the emerging masterplan for the site. It is suggested that wording “and others as agreed through the planning application process” should be added to provide appropriate flexibility for the development management stage.

This indicates that the SDC did not initially agree to a northerly access point.

## October 2022 - Border Archaeology HIA for SDC

“St. Margaret’s Church may be regarded as a heritage asset of **High** significance...”

“In order to minimise these potential impacts, as shown on the draft masterplan, it is thus proposed to include a buffer zone of approximately 150 m radius within the NE portion of the site located closest to the Grade II\* listed church, to preserve it’s immediate setting...”

“It is respectfully suggested that it may be advisable to further increase the buffer zone around the immediate setting of the church...”

## February 2023 - SOCG SDC and Historic England

This set out matters which were not agreed including how best to ensure site-specific recommendations from the evidence will be fully appreciated by prospective developers and given appropriate weight by decision makers. The unresolved issues included a reasonable buffer zone of approximately 250 m.

## 21<sup>st</sup> June 2023 - Draft Modification SDC and Historic England

Modifications to supporting text paragraph 3.4.28

“This will include a green buffer on the western, southern, and eastern edges on the development. A green buffer of approximately 250 m around St. Margaret’s Church will help retain the historic buildings prominence in the surrounding landscape...”

## 22<sup>nd</sup> June 2023 - Hearing EiP Stroud DC YouTube

Inspector Wright said that she and Inspector Lucas had visited St. Margaret's and were aware of ongoing discussions with Historic England. They had concerns on heritage issues, particularly regarding the church, and took evidence on this first on the G2 discussion. She mentioned specifically that the setting was part of the listing.

Natalie Whalley for SDC said that the council wanted to preserve "a sense of openness" and "underdevelopness" and would only permit a small shelter or building in a community context. The type of building should be determined at the Development Management stage. She stressed the importance of landscape impact saying that the Court Farm buildings would be appropriate as the extent of the buffer. She told the Inspector that the buffer should be a green buffer.

## October 2023 - RPS HIA for Taylor Wimpey

".. Stroud District Council have suggested the possibility of expanding the buffer, in places, and providing a uniform 250 m offset from the church. However it is considered that such a rigid response is not appropriate in this case.

## February 6<sup>th</sup> 2024 Historic England to SDC

".. while there is agreement that the harm is likely to be less than substantial, as defined under the NPPF, the significant loss of rural setting to the Church will result in a high degree of less than substantial harm.."

# **1. The Modal Hub Location and St. Margaret's Church.**

## **Objection :**

**The Modal Hub and its access to the A4173 is against the policy of the current Local Plan and the location is within both the 150 m and the proposed 250 m distances of the Church in the emerging Local Plan. The distance from the Church to the fence line next to Court Farm buildings is approx 150 m.**

**The County Council have confirmed that they do not require the Hub at this location and Stroud District Council did not agree to an access to the A4173 there at the masterplanning stage or in the emerging Local Plan, see page 160.**

**If built, the Hub will adversely impact the Church and its setting, including the extended graveyard, with noise, floodlighting and visually, particularly with the 62 and 63 double-decker buses. Historic England have confirmed that it would cause a high degree of less than substantial harm with the loss of rural setting. There is an alternative site for the location of the Hub so that there is no basis for a wider benefit argument.**

# **2. The Stroud Local Plan and the Strategic Local Plan.**

## **Objection :**

**The application is against current development policy and under the safeguarding policy in the emerging Local Plan a request for allocation is required from Gloucester under the approved strategy of the S and LP has been approved after Examination and adoption by the three authorities. An approved strategy is required by the emerging Local Plan at page 158.**

### **3. The SRN and Javelin Park.**

#### **Objection :**

**Until the EiP of the emerging Plan is completed it is not known whether the upgrades of J12 and J14 on the M5 can take place within the the Plan period. Whaddon G2 has been identified as impacting J12 and even if a Plan is adopted it is not known whether National Highways will object to a Planning Application or impose Grampian conditions. In addition to G1 and Hunts Grove Extension, Javelin Park will increase traffic impacts as the site is to be enlarged to 27 hectares.**

### **4. St Barnabas and Traffic Impacts.**

#### **Objection :**

**As Taylor Wimpey do not accept the modelling on which the Traffic Forecasting Report and Addendum are based, they rely on their own Transport Assessment but this has not been supported by the County Council. The Statement of Common Ground with the County Council and TPA confirms that queuing lengths would increase with cycling and pedestrian priorities and minor roads such as Firwood Drive, Epney Road, and Upton Lane will have major increases in traffic flows.**

### **5. Sustainability.**

#### **Objection :**

**Technical Note II from Atkins on behalf of the County Council and submitted to EiP of the emerging Local Plan concluded that the Whaddon Site was not sustainable on transport without additional crossing points over the railway. Taylor Wimpey do not agree they are necessary and also propose the closure of the existing level crossing. They do not agree with the requirement from the County Council for a low traffic neighbourhood so that there will be no restriction on private cars at Whaddon Grange. This will only increase dependence on car travel at a site with the lowest accessibility scoring in the Stroud District. The proposed Travel Plan has been criticised by Active Travel England as being underfunded and potentially ineffective.**

**The County Council has submitted to the EiP that a junction upgrade can cost £350 - £400 million and take up to 15 years.**



## **6. Stagecoach and Public Transport.**

### **Objection :**

**The Planning Application does not ensure proper public transport provision. Stagecoach stated in a Reg 19 submission to the Emerging Local Plan that Whaddon G2 was not sustainable as the Stroud Road route was congested and an alternative route was needed. In a statement of common ground with Travel Planning Associates Stagecoach agreed that Stroud Road could be bypassed using Firwood Drive. This is not now adopted. As the site builds out the 62 and 63 buses will be more heavily used on Stroud Road with an additional Orbital bus using the same route. The planning application shows all three buses using Stroud Road without diverting to Firwood Drive. See page 58 of Transport Assessment.**

**Without a halt on the railway line and spaces for only 150 cars in the Hub the site will rely on public transport for modal change. With limited active travel this means that buses will be the main option. As the diversion to Firwood Drive is not to be used for the 62, 63, and orbital buses then Stroud Road will become increasingly congested as will be St. Barnabas.**

## **7. Naas Lane.**

### **Objection :**

**The Planning Application is not evidenced with any modelling on Naas Lane. The scheme for the underbridge is unsafe as it shows a virtual pavement on the road surface being the only pedestrian crossing proposed across the railway. The County Council, Ramblers Association, PROW, and Active Travel England all state that the virtual pavement is unsafe. That route had been moved to the level crossing for the Glevum Way for safety reasons.**

**Historically, Naas Lane used the level crossing with the underbridge being an access route from the East to farmland on the West. There was no road or track on the West side. The underbridge did not include a safe route for pedestrians as found at Grange Road and Tuffley Lane underbridges. "The Chartered Institute of Highways and Transportation specifies the Absolute Minimum width of a pavement at 1.8 m the Desirable Minimum width at 2.0 m"**



## **8. Tuffley Farm.**

### **Objection :**

**The Planning Application contains no commitment to create an access to Grange Road across Tuffley Farm which is required by Stroud District Council and Active Travel England. Without it bus movements through the Hub will increase. It is also unclear whether there has been modelling of potential car numbers from that site as part is not within the G2 site but neighbours it. That land is within Gloucester District and is shown for housing development by LQ Estates Ltd.**

## **9. Gloucestershire County Council and Gloucester City Council.**

**The Parish Council notes that the County Council says in its response that it has significant concerns whether the St. Barnabas scheme will mitigate the impact of the development. And the City Council say that they remain concerned about the potential impact on the highway network, particularly St. Barnabas and J12, with the application being premature.**