

Department for Environment and Community Services

Local Plan Review  
The Planning Strategy Team  
Stroud District Council  
Ebley Mill  
Stroud  
GL5 4UB

Date: 22<sup>nd</sup> January 2020  
Our Ref: SGC/b11\_7/StroudLP/November 2019  
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**By email**

Dear Sir/Madam

**Stroud District Local Plan Review November 2019**

Thank you for the opportunity to comment on the Stroud District, Local Plan Review Draft Plan for Consultation, November 2019.

South Gloucestershire council provides the following officer comments, focussed on potential cross boundary considerations. We welcome the opportunity to explore these in more detail through the preparation a Statement of Common Ground, covering the emerging Stroud and South Gloucestershire Local Plans as required by the NPPF (Paragraph 27).

Our comments at this stage are primarily focussed on the key issue of the transport implications of the growth strategy set out in the plan and follow on from comments raised in response to previous consultations (see SGC response dated 18/1/19 to the Stroud Local Plan and Statement of Community Involvement Consultation). In addition we are raising a query at this stage in relation to the impact of proposed allocations on the Severn Estuary Special Protection Area.

It is acknowledged throughout the companion study document *Stroud District Settlement Role and Function Study* that current levels of out-commuting from the District to employment opportunities in South Gloucestershire, Bristol, Bath & North East Somerset and North Somerset are significant.

For settlements in the south of the District, the percentage of commuters currently travelling to South Gloucestershire, Bristol, Bath & North East Somerset and North Somerset for work is as follows:

- Newtown & Sharpness (32%)
- Berkeley (32%)
- Wotton-under-Edge (38%)
- Kingswood (38%)

These figures demonstrate the attraction of the major employment opportunities available in neighbouring authority areas to the south of the District.

With major development proposed at Newtown & Sharpness (2,400 homes in the plan period rising to 5,000 by 2050, plus 300 at Sharpness docks) and further infill at Berkeley (120 homes) and Kingswood (50 homes), the scale of development could pose significant challenges for the operation of the transport network in South Gloucestershire.

The *Stroud District Settlement Role and Function Study* also recognises that South Gloucestershire and Bristol are key workplace destinations for settlements closer to the centre of the District, such as Cam. With a new settlement at Wisloe (1,500 homes) and additional development north of Cam (880 homes across two sites) the scale of development in these locations is also likely to add significant commuter numbers to the South Gloucestershire transport network.

Proposals for new communities incorporating a range of services and facilities are welcomed at the major sites, helping to internalise trips. Further employment provision to the south of the District (10ha at Sharpness, 7ha at Sharpness docks and 10ha at Renishaw New Mills) is also broadly welcomed, although these developments should be prepared to contribute to local transport improvements to help facilitate more sustainable forms of travel and at the same time seek to constrain work-place parking provision.

SGC request proposals to expand employment provision at Renishaw New Mills, include contributions to the proposed rail station at neighbouring Charfield (approx. 1 mile from Renishaw) and delivery of sections of the Wotton-Charfield-Kingswood Greenway project, in order to provide a safe and convenient walking and cycling connection between Renishaw New Mills and Charfield. SGC would welcome this approach to joined-up cross-boundary working as it is essential if we are to reduce the impact of new development on local communities and to meet our shared ambition of carbon neutrality by 2030.

The consultation material includes the accompanying *Sharpness Natural Neighbourhoods – Promoter Material*, which provides further information on the proposed new settlement at Sharpness. The document's *Movement Strategy* outlines opening the Sharpness rail line for passenger services, focussed on connections north to Cam & Dursley and Gloucester, including presumably the opportunity to interchange at Cam for south bound trains (although this is not explicit), and bus provision for those travelling to South Gloucestershire and Bristol.

SGC welcome the inclusion of public transport provision and recognise the important role it can play in meeting objectives relating to climate change and minimising congestion impacts of development. While accepting that the detail of the public transport solutions are evolving, they are nevertheless fundamental to supporting the overall strategy and consequently need to be sufficiently robust and of high enough quality, to achieve the level of modal shift with a high degree of certainty. In this context it is not clear from the promoter material which route(s) the bus services would take, but presumably the A38 or M5 via junction 14 are likely options. There are no clear references to provision of bus priority measures, so further evidence is required as part of the next stage of the Local Plan and before it is submitted for examination, to establish how the bus will prove to be more attractive than private car use - which benefits from door-to-door journey times. Further evidence to support the Plan should also be provided to demonstrate the rail and bus services are financially viable and deliverable.

It should be an objective of new development to the south of the Stroud area to not exacerbate existing congestion and to ensure impact on the M5 Junction 14 is minimised.

The *Sharpness Natural Neighbourhoods – Promoter Material* explicitly states that no increased highway capacity will be considered as part of the transport mitigation package:

*“We won’t limit car use if people really want to use this mode, but we aren’t planning to provide any extra capacity for them” ... “This approach recognises that where highway capacity is provided as part of development schemes – especially where it is provided as a “backstop” in the event that the sustainable modes are not taken up by users, then this effectively encourages use of the private car. If capacity is provided, irrespective of what alternatives exist, then it is clear that capacity will be used.” (p41 and 44 Sharpness Natural Neighbourhoods – Promoter Material)*

The above quotes suggest that contributions towards improvements at M5 J14 would not be considered by the developer. It appears too early in the process for the developer to rule this out at this stage and it is imperative that the potential for contributions to J14 should not be lost. In order for this approach to be credible, there needs to be absolute certainty that the modal shift

interventions, including rail, will deliver the desired outcomes as once the opportunity for contributions to J14 have passed they cannot be recaptured at a later stage, the risk is therefore significant to both Councils. Also, this potentially contradicts the *Local Plan Final Draft Plan Consultation Document* which states in the Key Challenges section:

*“Initial transport work has identified the likely need for major improvements at M5 junctions 12, 13 and 14” ... “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” (p29 of Local Plan Final Draft Plan Consultation Document)*

The two seemingly opposing strategies from the Sharpness promoter and the District Council need to be reconciled. SGC are supportive of the Local Plan text in relation to M5 Junction 14 improvements, pending an alternative strategy that can deliver substantial and sustained modal shift within both new and existing communities to the point where the safe operation of J14 can be sustained and endorsed by Highways England.

The proposed changes to Core Policy CP13 (page 166) on Transport and Travel to better emphasise the importance of prioritising sustainable transport options and implementing Stroud’s Sustainable Transport Strategy (currently being consulted on) is welcomed.

### **Gypsy & Travellers**

We note that your policy is focussed on addressing the accommodation needs identified in your GTAA and that through this approach SDC will meet all identified need within the District. Through our joint ongoing DtC liaison, SGC would expect to be made aware of the evidence and outcomes of this work to help inform our own G&T policy and evidence base preparation.

### **Impact on European nature conservation sites**

We note that a Habitats Regulation Assessment (HRA) screening report has been published to assess potential impacts on European wildlife sites arising from the Stroud Local Plan at emerging strategy stage. This HRA has identified potential significant impacts from the proposed strategic development allocation around Sharpness on the Severn Estuary SPA and we understand that an appropriate assessment will be required to further examine potential impacts. The Council considers that, in addition to any (direct or indirect) deleterious effects on the European Site itself, either alone or in combination, the assessment should address any impacts arising from an increase in recreational use, such as disturbance; and any effects on in-land wetlands/coastal floodplain which might be outside the SPA/Ramsar if used by significant numbers of waterfowl (‘high tide roosts’). To that end, the Council would ask that it is made aware of any significant effects identified within the assessment which cumulatively might have implications for that part of the European Site within South Gloucestershire; and that, in such circumstances, that it is involved in developing and delivering a suitable stratagem to mitigate against such adverse effects prior to the next stage of the Plan being prepared and submitted for examination.

### **Ongoing Engagement and Duty to Cooperate**

South Gloucestershire council officers look forward to working with Stroud District Council, through our ongoing Local Plan officer meetings, the ‘Sustainable Transport Strategy & Local Transport Group and through the preparation of Statements of Common ground, to address cross boundary issues ahead of the next stage of your Local Plan and in the run up to your reg 22 submission.

Yours Sincerely

  
**Strategic Planning Policy and Specialist Advice Team Manager**

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