

Stroud District Local Plan Review Examination

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Mr Mark Russell
Head of Planning Strategy and Economic Development
Stroud District Council

Sent by email

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Dear Mr Russell

Stroud District Local Plan Review Examination

1. We wish to extend our thanks to the Council and all other participants for their contributions to the recent hearing sessions for the Examination of the Stroud District Local Plan Review (the Plan). We indicated at the end of June that we would need to take some time to consider the additional evidence submitted during the hearing sessions, before providing our thoughts on the way forward for the remainder of the Examination.
2. We now consider it expedient for us to express our current thoughts, particularly regarding our fundamental concerns on issues surrounding the Strategic Road Network (SRN) and the Sharpness new settlement. We also have concerns regarding the new settlement at Wisloe which we will consider first.

Wisloe new settlement and other soundness issues

3. Our concerns relate to the provision of the pedestrian and cycle bridge over the motorway. As a critical piece of infrastructure, we would require the evidence to clearly demonstrate that this is both viable and deliverable. During the hearing session it became apparent that the projected costs for this piece of infrastructure and timescales for delivery had not been recently agreed with National Highways. We therefore have concerns that the costs for implementing this scheme may be higher than anticipated which could affect the overall viability of the site.
4. The evidence shows that the provision of this bridge is essential to ensure there is a sustainable pedestrian and cycle route to and from the nearby railway station and to other local services and facilities. Without it, the sustainable accessibility of this new settlement is of concern. However, we feel that additional evidence on this issue, could potentially alleviate our concerns. Such evidence would need to demonstrate outcomes from further discussions with National Highways setting out agreed project costs and timescales and provide updated viability evidence for the site. We recognise that this would presumably take some time to achieve.
5. In addition to this, whilst we have a number of other soundness concerns with the Plan, we are confident that it is likely that these could be addressed by main modifications. However, these do not detract from our fundamental concerns over the soundness of the Plan, to which we now turn.

Strategic Road Network (SRN)

6. You will recall that at the start of the Examination, we held a focussed session to discuss issues relating to the SRN. This included discussion on Junctions 12 to 14 of the M5 motorway. The evidence base clearly identifies the need for improvements to all three junctions during the plan period. Those at Junction 13 appear to be specifically required to accommodate the site allocation under Policy PS20, whilst larger strategic junction improvements are necessary for Junctions 12 and 14 to accommodate the planned growth in the District. Indeed, the need for such improvements was not disputed by relevant parties. We focus our concerns in this regard on Junctions 12 and 14.
7. We fully recognise that issues with the capacity and safety of the SRN cannot be resolved by the District of Stroud alone. It is very much a wider regional concern that requires a more strategic resolution. Notwithstanding the engagement that has been held between the Council and key SRN stakeholders, we are concerned that the

evidence does not clearly set out when the improvements would be required during the plan period and how they would be funded and secured. We consider convincing evidence on these points to be fundamental to the soundness of the Plan.

8. At the end of the focussed session, we asked the Council to discuss a way forward on the SRN issues with relevant statutory stakeholders (specifically neighbouring Councils, the Highway Authority and National Highways) and to agree a project timetable with measurable outcomes. We were quite clear that simply agreeing to continue to talk about this issue would not address our concerns. We therefore provided the Council with the opportunity to prepare further evidence in connection with our concerns.
9. In response to this, the Council submitted the document Strategic Road Network – Agreed Next Steps. We wrote a brief letter in response to the Council dated 6 June 2023 stating that we were not convinced that the statement addressed our fundamental concerns. Whilst we appreciate the efforts of the parties involved in the process of producing the document, it does not include any timescales or measurable outcomes and commitments.
10. As regards the issue of funding, the Transport Funding and Delivery Plan (July 2022) (TFDP) sets out a methodology that calculates the financial contributions that specific developments within Stroud District would contribute towards the identified SRN schemes. We have concerns regarding this methodology, specifically the lack of justification for the apportionment method used which uses growth from Stroud alone as a proxy for growth in neighbouring areas and the lack of agreement with neighbouring Councils as to predicted growth within their areas.
11. Neighbouring Councils and the County Council have also made it clear that at the present time they are unable to clarify the quantum or location of future growth that will take place in their areas due to the early stage of their Local Plans. Whilst we appreciate that Stroud District Council wish to proceed with the adoption of their Plan, the approach proposed by the Council to attempt to deal with the SRN infrastructure requirements is inadequate. At this stage, we are neither satisfied that the methodology provides justified outcomes nor is it accurate in terms of presenting a pattern of future growth on which decisions about the funding of strategic infrastructure can be based.
12. During the hearing session held on 23 March 2023, which focused on Strategic Transport Infrastructure (Matter 11), it was acknowledged by the parties present that the costs for the M5 Junction 12 and

Junction 14 improvement schemes are, in reality, likely to be significantly higher than the costs identified in the TFDP. The significant increase in costs makes it unrealistic for these schemes to be funded solely from developer contributions. Accordingly, and as acknowledged by the Council and other parties present at the session, some form of external government funding would need to be attained. No such funding bids are currently in preparation or actively being sought.

13. We are aware that it usually takes many years to bid for and secure appropriate funding for such strategic road infrastructure, so it is clearly not a quick process. As things stand, there are no current realistic plans for how and when the improvements to Junction 12 and Junction 14 would be funded or delivered. Based on the evidence, we have significant concerns as to whether the SRN infrastructure improvements required to accommodate the planned growth would be delivered during the plan period.
14. We are mindful of the Council's desire to have a Plan in place and recognise the contribution towards sustainable development objectives that having an up-to-date Plan in place would make, not least by increasing the supply of housing and employment opportunities which are important Government objectives. However, such growth must be planned and delivered sustainably. Part of that consideration involves ensuring that the necessary infrastructure will be in place to support that growth.
15. In response to our request at the focussed session held on 23 March 2023, the Council produced a note indicating which site allocations they considered could be delivered without triggering the need for the mitigation schemes to be delivered at M5 Junctions 12 and 14 (SLP-AP-002, Appendix 2, dated 12 May 2023). The note also usefully sets out those sites which would trigger the need for the mitigation works to be delivered. In relation to Junction 12 these are identified as: G1 (South of Hardwicke), G2 (land at Whaddon) and PS30 (Hunts Grove Expansion). For Junction 14 these are identified as: PS34 (Sharpness Docks), PS36 (New Settlement at Sharpness) and PS37 (New Settlement at Wisloe).
16. We note the concerns raised by National Highways to the Council's approach in determining this list of sites. Whilst we acknowledge these concerns, the Council's list usefully emphasises the fact that the delivery of the Plan's spatial strategy for growth, which includes the creation of two new settlements, is dependent upon the SRN infrastructure improvements at Junctions 12 and 14.

17. National policy emphasises the need for development, including new settlements, to be supported by necessary infrastructure. The Planning Practice Guidance (PPG) sets out how a Plan can demonstrate that it can deliver strategic matters, through identifying how infrastructure can be funded and brought forward, and where existing infrastructure cannot meet forecast demands how these can be addressed. Also, whilst acknowledging that there may be uncertainty regarding securing funding for strategic infrastructure, the PPG states that it must be demonstrated that there is a reasonable prospect that proposals can be developed within the timescales envisaged.
18. Based on our concerns as expressed above, we do not at this stage have confidence that necessary improvements to M5 Junctions 12 and 14 will be funded and delivered during the plan period. We therefore cannot conclude that there is a reasonable prospect that the relevant site allocations will be delivered and, therefore, that the spatial strategy as a whole is sound.

Sharpness new settlement

19. In relation to Sharpness, the proposal in the Plan seeks to build a sustainable settlement based on garden city principles and the prioritisation of transport by means other than the private car has been put at the heart of the development's ethos. However, whilst a significant amount of evidence has been submitted regarding the provision of a passenger train service and bespoke Mobility as a Service transport scheme (MaaS), we have serious concerns relating to the viability and deliverability of these schemes.
20. Specifically, the cost of providing a passenger train service has not been audited or agreed with Network Rail or the relevant Train Operating Company (TOC). The costs therefore may well be subject to change. In response to suggestions that the scheme would not meet the criteria to apply for external funding, the developer has said that it would be self-funded by the development. However, this leaves limited flexibility should costs rise as is often the case with infrastructure projects. Furthermore, the developer advised that any subsidy for the railway service would end after 3 years at which point it would be expected to be self-funding. We are not convinced that this would allow a sufficient timeframe for a new service to be established. In addition, the train service would call at Gloucester and would not extend to Bristol, which is an important economic centre. Given that the service would need the agreement of Network Rail and the TOC we are also concerned about the lack of recent engagement. We therefore have concerns that the train service is not viable or deliverable whether it is self-funded or not.

21. Whilst additional evidence has been submitted regarding the MaaS scheme, this does not provide indicative costs for implementing such a scheme at Sharpness. We therefore have concerns regarding its likely cost, how it would be funded and whether it would be viable. In addition, we are still not clear how a scheme like this has been successfully implemented in the context of a new settlement rather than an urban area where existing public transport options already exist and are well-established.
22. Taking these issues together, they call into question whether the sustainable accessibility of the site can be achieved. Should both the train service and the MaaS scheme not be delivered as proposed within the Plan then what would remain would be a large new settlement where the use of the private car for external journeys would likely become the default option for the majority of residents. This outcome would fundamentally conflict with the Plan's overall vision, its spatial strategy and the garden city ethos for new settlements.

Way forward

23. We have carefully considered various possible alternative ways forward, including whether an early review of the Plan would be acceptable or whether pausing the Examination to allow for the preparation of further evidence on the SRN and new settlement issues would be productive. However, we believe that our concerns are so fundamental to the Plan as a whole that this would not be something that could be appropriately addressed by an early review of the Plan. Moreover, recognising our concerns about how long it would be likely to take to progress this additional evidence, particularly in relation to the successful securing of external funding bids and determining when the infrastructure would be delivered, we seriously question the usefulness of allowing a delay to the Examination which could be for an extensive period.
24. Given the issues that we have identified regarding the SRN and the new settlements, this potentially means that a significant proportion of the Plan's allocated sites may not have a realistic or reasonable prospect of being delivered within the plan period. The lack of an immediate solution to the SRN issue is a significant constraint and on this basis we recognise that it is possible that Stroud District may not be able to meet its Objectively Assessed Need for housing in full.
25. However, before reaching a conclusion as to whether or not this is the case (and if so the extent of the shortfall), the Council would be likely to need to consider whether it could allocate omission sites to make up some or all of the shortfall. Inevitably, this would be a lengthy process as considerable additional evidence would be

required, including the assessment of cumulative impacts on the SRN. This work would also need to be agreed with key SRN stakeholders including National Highways. The outcomes of this work cannot be predicted at this time and the process would likely cause significant delays to the Examination process. It could also ultimately result in a fundamentally different spatial distribution of development which would be likely to require further extensive consultation and assessment. It would not be appropriate for this to be dealt with through an ongoing Examination.

26. Agreeing to a considerable delay or pause in the Examination process could also cause other issues as some existing evidence could become outdated, requiring more delays to allow for updates. At this time, we are not convinced that a significant delay to the Examination would be genuinely more effective than stepping back several stages in the plan making process to allow for adequate time to engage on the SRN and other issues, in order to achieve successful outcomes and consider the implications for the spatial strategy and for meeting the District's OAN.
27. Consequently, whilst we recognise the need for pragmatism in the examination of local plans and the desirability of an up-to-date plan for Stroud District being found sound as soon as possible, we think it only fair to advise you that we currently consider that withdrawal of the Stroud District Local Plan Review from this Examination may well be the most appropriate way forward. Given that the Plan's spatial strategy needs to be supported by necessary infrastructure provision and we have raised fundamental concerns about this issue, we seriously question how such matters could be addressed by alternative means.
28. Given that the relevant hearing sessions regarding the SRN, spatial strategy and site allocations have now been held and that these all relate to our fundamental concerns regarding soundness, there seems little merit in resuming the remainder of the hearing sessions after the summer break. This is because they would not change our views on the soundness issues that we have raised in this letter as they cover other matters that do not go to the heart of our concerns.
29. We recognise that you may need some time to consider your response to this letter and, therefore, we are setting no deadline for it. However, we will not reach final conclusions on the way forward for the Examination until we have had the chance to consider your response to this letter. It would therefore be helpful if you were able to give us a broad indication of the likely timescale for us to receive a full response as soon as possible. We have asked the Programme Officer to post a copy of this letter on the Examination website, but

we are not inviting, nor envisage accepting, comments on it from any other Examination participants.

30. We appreciate that the Council will be extremely disappointed by this letter. However, we trust that you recognise that we have not reached these initial conclusions lightly and have done so only after careful consideration of the evidence.

Yours sincerely

Victoria Lucas and Yvonne Wright

Inspectors appointed to examine the Stroud District Local Plan Review