



Department for Environment and Community Services

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

Date: 20 July 2021
Enquiries to: Strategic Planning
Section: ECS
Tel: 01454866152
E-mail: Planningpolicy@southglos.gov.uk

By email

local.plan@stroud.gov.uk

Dear Sir/Madam

Stroud District Local Plan Regulation 19 consultation

Thank you for the opportunity to comment on the Stroud District Local Plan Review Regulation 19, July 2021.

Our comments follow on from comments raised in response to previous consultations (see SGC responses dated 22/1/2020 and 18/1/19 to the Stroud District Local Plan and Statement of Community Involvement Consultation). We would like to make the following comments focussed on potential cross boundary considerations.

1. Impact of strategic growth at Sharpness and Cam and Dursley on the Severn Estuary Special Area of Conservation

This issue was raised by SGC in previous consultation responses. We note that SDC has followed national guidance in undertaking a Habitats Regulations Assessment and Appropriate Assessment on the potential impact of its proposals on the Severn Estuary European sites. We note that a significant mitigation measures are proposed in relation to these impacts in allocation policies at the Sharpness and Wisloe strategic development sites.

2. Transport impacts

Issues have been raised previously on the potential impacts on SGC's transport network arising from development in the Stroud Local Plan.

The impact of proposed growth within Stroud is a cross boundary issue for us as this scale of development could pose significant challenges to the operation of the transport network in South Gloucestershire. In particular we are concerned about the impact of strategic housing and mixed use developments at Sharpness/Berkeley and Wisloe and the employment allocation adjacent to Renishaws (P47). We welcome recognition of the capacity issues at M5J14. However, references to this issue in the Plan (para 2.30; 2.35 referencing SGC's new Local Plan, and para 2.36 which suggests unspecified improvements to strategic infrastructure) are limited. We would welcome further clarification on what Stroud DC consider to be the infrastructure evidence base and the degree of certainty that can be attributed to infrastructure interventions/ possible responses.

In relation to P47 it can be anticipated that jobs on this site are likely to be high value and high skilled. Accordingly they are likely to experience travel patterns from a wide geographical area with associated impact on M4 J14 and Wotton Road in Charfield. It is essential therefore that a robust Transport Assessment and Travel Plan is provided, and SGC consulted at the earliest opportunity. Para 3.149 is an upgrade on the previous iteration of this policy and text, and reference to contributions to Charfield Station, the Greenway and public transport improvements is welcome, but not well-defined. It is considered this could be better defined at this stage and given more certainty of delivery. The impact on M5 J14 should also be referenced and a contribution towards M5 J14 should be included in this paragraph.

As a relevant matter of fact the Sustainable Transport Strategy shows very limited reference to J14, and does not include the assessment of J14 discussed in meetings between SGC and SDC prior to COVID. Recent M5J14 modelling suggests that capacity at the junction is already exceeded and that improvements are needed ahead of any new growth (HE has proposed a Grampian condition on proposed development Land West of Park Farm, Thornbury to this effect).

The impacts from different developments therefore require fuller investigation and more detailed proposals for mitigation. We would assign a higher priority towards these issues working towards a comprehensive solution, including further joint working and a greater commitment to seeking developer contributions (potentially via a roof tax approach) to be worked up jointly with HE, SGC and WECA.

We note and welcome potential contributions to Charfield Station and the Charfield-Wotton Greenway Project within Policy P47. However these should be given more prominence and certainty of delivery with ongoing work with SDC and SGC officers on further defining details and delivery mechanisms.

3. Berkeley nuclear policy

Policy E12a Former Berkeley Power Station safeguards the site for B2/B8 as well as training and educational purposes associated with the decommissioning of the power station and the Science and Technology Park. Para 5.28 refers to and supports the joint bid by SGC, SDC GCC, and the Western Gateway for a prototype nuclear fusion power plant and associated facilities as part of the STEP UK programme. SGC notes this paragraph and looks forward to continuing joint working through the Western Gateway. However we suggest that it would be helpful to add reference to the need to secure improvements to related infrastructure to support sustainable delivery of this project into policy E12a and supporting text.

4. Statement of Common Ground

The supporting Statement of Common Ground between West of England and Stroud is dated 9/11/18 and refers to JSP spatial strategy. This included proposals for specific strategic development in the north of SGC which are also referenced within the Reg 19 Local Plan. Since this time the JSP has been withdrawn and therefore has no weight or status. Work on the West of England Spatial Development Strategy and South Gloucestershire Local Plan has commenced but no allocations have been proposed as yet.

Any references to the JSP strategy in the Stroud Local Plan should be removed and a new Statement of Common Ground will be required prior to the examination of the Stroud Local Plan. We would welcome an early opportunity to progress a new Statement of Common Ground with Stroud DC.

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 updated Statements of Common ground, to address cross boundary issues in the run up to your Regulation 22 submission.

Yours sincerely



Strategic Planning Policy and Specialist Advice Team Manager