

Technical Note

Project: Stroud LDP

Subject:	GCC Response to Inspectors Questions Stroud LDP Examination in Public		
Author:	C Currie		
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Distribution:	Luisa Senft-Hayward Nathan Dover Li Holdman Sarah Williams	Representing:	Gloucestershire County Council

Document history

Revision	Purpose description	Originated	Checked	Reviewed	Authorised	Date
1.0	Summary of Questions/Answers from TN1 to 3	CLC	LT	JJ	CLC	06/02/2023
1.1	Updated during client discussion	CLC	LT	JJ	CLC	09/02/2023
1.2	Reformatted for final issue	CLC	LT	JJ	CLC	10/02/2023

Client signoff

Client	Gloucestershire County Council
Project	Stroud LDP
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1. Introduction

1.1. Stroud LDP

Atkins are pleased to have been commissioned by Gloucestershire County Council to provide expert witness advice in support of the Examination in Public process for the Stroud LDP. This Expert Advice will be provided to Gloucestershire County Council through a series of targeted topic related Technical Notes

TN1 - Sharpness Vale Development Site

TN2 - Whaddon Strategic Development Site

TN3 - Cost of Transport Interventions

TN4 - Responses to Planning Inspectors Questions under the Examination in Public 'Matters and Issues'.

The technical notes provide a summary conclusion which highlights the key issues that contribute to GCC's conclusion that the evidence for these matters are 'not sound' or have insufficient evidence to reach a conclusion. The Technical Notes support the Gloucester County Councils' Regulation 19 response to Stroud District Council made in July 2021.

2. Inspectors Matters, Issues and Questions specific to the Sharpness

2.1. Matter 1 Compliance with statutory procedures and legal matters

Below is a full extract of the questions raised by the Planning Inspectors in reference to the issues of concern, or that required further investigation, The majority of the questions do not require a direct response from Gloucester County Council as the Highway and Transport Authority and have been marked below as **No/Qu** (no specific detailed questions) or **no additional response provided** (not applicable or not addressed) **and the remainder include a summary response and reference to three technical notes supporting the County Council's views on Sharpness, Whaddon and infrastructure costs.**

Issue 1.1 – Has the Council met the statutory duty to cooperate as set out under Sections 20(5)c and 33A of the Planning and Compulsory Purchase Act 2004? No/Qu

Issue 1.2 – Has the Plan been prepared in accordance with other legal and procedural requirements? No/Qu

2.2. Matter 2 Spatial Strategy and site selection methodology

Issue 2 – Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives? Has the site selection process used an appropriate methodology that is based on proportionate evidence? no additional response provided

Spatial strategy

- 5 Is the reliance on the delivery of most of the growth on a relatively small number of strategic development sites, including two new settlements, justified? How were the locations for the two new settlements at SHARPNESS and Wisloe identified and was the process robust? **no additional response provided**

Settlement hierarchy

16 New settlements are proposed within the Plan, at **Sharpness** and Wisloe, but are not included in the settlement hierarchy. The approach in the Plan is to define these as settlements through a future Local Plan Review. Yet reference is made to 'anticipated' local centres within these settlements within Core Policy CP12.

- a. Why are these proposed new settlements not in the hierarchy? **no additional response provided**
- b. If housing and employment growth will be centred at these new settlements, how will the distribution of growth in the Plan reflect the settlement hierarchy if they are not included within it? **no additional response provided**
- c. How will development proposals at these locations be dealt with where several policies in the Plan refer to the settlement hierarchy in their application? **no additional response provided**

2.3. Matter 3 Housing need and requirement

Issue 3 – Is the identified housing need supported by robust and credible evidence, justified and consistent with national policy? Is the Plan's housing requirement of at least 12,600 dwellings justified and consistent with national policy? Is the Plan's approach to addressing some unmet housing needs for Gloucester soundly based? No/Qu

2.4. Matter 4 Employment needs and requirement

Issue 4 – Are the identified employment needs supported by robust and credible evidence, justified and consistent with national policy? Is the Plan's proposal to accommodate 79 ha of employment land soundly based? No/Qu

2.5. Matter 5 New settlements at Sharpness and Wisloe

Issue 5 – Are the proposed new settlement allocations at Sharpness and Wisloe justified, effective and consistent with national policy?

Strategic Site Allocation Policy PS36 Sharpness new settlement

The policy proposes the allocation of land south and east of Newtown and **Sharpness** for a new mixed use garden community. This includes up to 2,400 dwellings by 2040 and 10ha of employment land. The policy requires a range of strategies and plans to be developed that will require approval by the Council. This includes 25 criteria to be addressed.

1. Does the proposed allocation meet the vision, spatial strategy and strategic objectives set out in the Plan? Does the policy ensure that these objectives will be met? **The Strategic objectives concerning accessible communities, transport and travel and climate change have to be considered in the context of NPPF paragraphs 104 and 105, the plan does not meet all of the required objectives and specifically with respect to significant developments. Paragraph 105 states that *developments should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes* and this is not the case with the Sharpness Vale development. See TN1 Sharpness.**
2. Does the evidence adequately demonstrate that the proposal will accord with the sustainable ethos of garden communities? **No, see Section 3 of TN 1 Sharpness, but specifically the areas of concern are failure to accord with the Garden City Principles:**
 - **Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport****TN 1 sets out why the envisaged rail and bus public transport offer is unlikely to come to fruition.**
3. Is the policy aim, of providing a new self-contained garden community settlement, viable and realistic? Has this been robustly demonstrated and is the development, as envisaged in the Plan, likely to be achieved during the plan period? **No see Section 3 of TN 1 Sharpness, but specifically the areas of concern are:**
 - I. **Key parts of the transport proposals which would be needed to ensure the Development reduces the need for travel in private cars are not within the direct control of the Developer. These are specifically the proposed rail improvements proposed and the road-based bus public transport provision.**
 - II. **There is no evidence of statements of common ground or commercial agreements in place between the Developer and local / national transport operators that demonstrate that the public transport provision by bus and rail will materialise nor with travel-planning service providers.**
 - III. **In evidence, the Developer has provided an Outline Case Submission prepared for the DfT/ Network Rail Restoring Your Railway Fund submission in October 2020. As stated within that document, this represents “an overview business case appraisal rather than one that is fully compliant with HM Treasury’s Green Book appraisal process”.**

The review by Atkins of the Outline Case Submission identifies the following issues:

- **There is no evidence that engagement with the relevant Train Operating Companies (TOCs) has taken place to understand whether a service is feasible. There also appears to be no consideration of other potential plans for upgrades by the TOCs or Network Rail to other routes or services in the area which may limit the possibility for services to Sharpness.**
- **The expectation is that the DfT / Network Rail would be responsible for funding the majority of the scheme. Given this Outline Case Submission was prepared for at least one specific funding opportunity (Restoring Your Railways) and there is no evidence of grants for further Business Case development or guarantees to fund the scheme from either funding party, doubts must be raised about the feasibility of the scheme being delivered.**
- **Whilst a positive Cost Benefit Analysis has been reported in the document, the robustness of that analysis must be questioned for several reasons, not limited to:**
 - o **The appraisal of benefits has not been conducted in line with the DfT’s Transport Appraisal Guidance.**
 - o **Calculations for scheme demand have been undertaken by applying a set of Trip Rates to the existing land uses and proposed Sharpness Development, which implies a guaranteed rail usage. This is as opposed to the use of the strategic rail modelling using standard industry tools which would identify how likely any demand for the new service would be.**

- There has been no estimation of the operational cost requirements for running services along the proposed route, nor have infrastructure costs been estimated in line with appropriate guidance.
- IV. No letters of support for delivering additional services in the area have been provided from either Network Rail or local bus operators since the 2020 discussions with the Developers of the Sharpness Vale site.
 - V. The proposals that the Developer has assumed will be delivered by Network Rail are not included in the *Bristol to Birmingham - rail corridor strategic study* and therefore are currently considered aspirational as they are unlikely to materialise.
 - VI. The significant improvements to the road based public transport service proposals are also not within the direct gift of the Developer and would be likely to require significant financial support to ensure their commercial viability. This can be evidenced by GCC's ongoing subsidised Berkeley 62 bus service which continues to remain unviable, with a very high subsidy and generally low passenger usage.
 - VII. GCC have commissioned their own assessment of the rail proposal by SLC Rail. The Rail Service Viability Report from SLC Rail (June 2021-V2) is included at Appendix C. In summary, the SLC observations are that, based upon the current situation, that there are considerable risks to the viability of the scheme which make it unlikely that it would gain the necessary approvals to progress to delivery.
 - VIII. Stagecoach's Schedule 19 representations are included in Appendix A and that states that "Stagecoach, has been abundantly and consistently clear about its very serious concerns about the appropriateness of a local plan strategy that includes a remote new settlement at Sharpness".
 - IX. Stagecoach and Atkins met on 9th January 2023, Atkins is able to confirm that currently there is no Statement of Common Ground between the Developers of the Sharpness Vales site and Stagecoach as the main road based public transport provider in the area. A note of this meeting is included in Appendix D.
4. In relation to infrastructure:
- a. Does the policy clearly identify what infrastructure is necessary to support the delivery of the allocation? Will it be delivered at the right time and in the right place? How will this be achieved? No it does not – see Section 3 of TN 1 Sharpness. There is no plausible funding and delivery strategy for the rail infrastructure and there is no SOCG with bus providers and funding mechanism for a long term sustainable bus based option. See TN 3 Infrastructure costing and the concerns about the under estimation of the M5 junction enhancements.
 - b. Has the impact of the new settlement on the surrounding road network, including nearby motorway junctions, been adequately assessed? Can any impacts be mitigated and if so, how and when? Is this feasible? Is the policy sufficiently positively worded in this regard, for example with reference to M5 junction 14.. See TN 3 Infrastructure costing and the concerns about the under estimation of the M5 junction enhancements, in particular Junction 12 and 14 of the M5.
 - c. The policy refers to a new railway station being delivered on the **Sharpness** branch line as part of the development.
 - i. What is the status of this project and is the delivery of the site allocation dependent on this coming forward? See Section 3 of TN 1 Sharpness - Network Rail have not included these proposals in their forward plans. SLC report (see Appendix C of TN 1) also casts significant doubt on the delivery of these rail proposals. No detailed proposals have been provided to GCC as the Highway and Transport Authority to review that demonstrate a plausible mechanism for funding and delivery or operational business case thereafter.
 - ii. What level and frequency of rail service is proposed and is this supported by Network Rail and relevant service providers? No agreed service provision – see Section 3 of TN 1 Sharpness. There is no realistic prospect of this rail link coming forward to support housing at Sharpness,
 - iii. Has funding been identified to support the delivery of this scheme? None appear to be readily identifiable in the EiP library and the Restoring Railways Bid was unsuccessful which supported the rail improvements for Sharpness. A planning application has recently been submitted for the restoration of the mainline Charfield station.

iv. What are the proposed timescales for its delivery and would it be in time to support the new settlement? **No timescales provided and there is concern that there is no realistic prospect of the sustainable transport provision being delivered for Sharpness – see Section 3 of TN 1 Sharpness.**

e Is the proposed new rail link (on the Bristol-Birmingham mainline) and express coach services deliverable and viable and have funding sources been identified for these schemes? What is the timetable for delivery for these projects and will they be delivered in time to support the allocation? The policy refers to the coach link being required at an early stage in the development, is this viable? Have discussions taken place with the relevant infrastructure providers taken place (such as Network Rail) and do they support the projects? Has funding been identified? Has capacity been identified on the Bristol-Birmingham mainline to accommodate additional passenger traffic? **Not supported – see Section 3 of TN 1 Sharpness and the specifically the areas of concern are:**

- I. Key parts of the transport proposals which would be needed to ensure the Development reduces the need for travel in private cars are not within the direct control of the Developer. These are specifically the proposed rail improvements proposed and the road-based bus public transport provision.
- II. There is no evidence of statements of common ground or commercial agreements in place between the Developer and local / national transport operators that demonstrate that the public transport provision by bus and rail will materialise nor with travel-planning service providers.
- III. In evidence, the Developer has provided an Outline Case Submission prepared for the DfT/ Network Rail Restoring Your Railway Fund submission in October 2020. As stated within that document, this represents *“an overview business case appraisal rather than one that is fully compliant with HM Treasury’s Green Book appraisal process”*.

The review by Atkins of the Outline Case Submission identifies the following issues:

- There is no evidence that engagement with the relevant Train Operating Companies (TOCs) has taken place to understand whether a service is feasible. There also appears to be no consideration of other potential plans for upgrades by the TOCs or Network Rail to other routes or services in the area which may limit the possibility for services to Sharpness.
 - The expectation is that the DfT / Network Rail would be responsible for funding the majority of the scheme. Given this Outline Case Submission was prepared for at least one specific funding opportunity (Restoring Your Railways) and there is no evidence of grants for further Business Case development or guarantees to fund the scheme from either funding party, doubts must be raised about the feasibility of the scheme being delivered.
 - Whilst a positive Cost Benefit Analysis has been reported in the document, the robustness of that analysis must be questioned for several reasons, not limited to:
 - o The appraisal of benefits has not been conducted in line with the DfT’s Transport Appraisal Guidance.
 - o Calculations for scheme demand have been undertaken by applying a set of Trip Rates to the existing land uses and proposed Sharpness Development, which implies a guaranteed rail usage. This is as opposed to the use of the strategic rail modelling using standard industry tools which would identify how likely any demand for the new service would be.
 - o There has been no estimation of the operational cost requirements for running services along the proposed route, nor have infrastructure costs been estimated in line with appropriate guidance.
- IV. No letters of support for delivering additional services in the area have been provided from either Network Rail or local bus operators since the 2020 discussions with the Developers of the Sharpness Vale site.
 - V. The proposals that the Developer has assumed will be delivered by Network Rail are not included in the *Bristol to Birmingham - rail corridor strategic study* and therefore are currently considered aspirational as they are unlikely to materialise.
 - VI. The significant improvements to the road based public transport service proposals are also not within the direct gift of the Developer and would be likely to require significant financial support to ensure their commercial viability. This can be evidenced by GCC’s ongoing subsidised Berkeley 62 bus service which continues to remain unviable, with a very high subsidy and generally low passenger usage.

- VII. GCC have commissioned their own assessment of the rail proposal by SLC Rail. The Rail Service Viability Report from SLC Rail (June 2021-V2) is included at Appendix C. In summary, the SLC observations are that, based upon the current situation, that there are considerable risks to the viability of the scheme which make it unlikely that it would gain the necessary approvals to progress to delivery.
- VIII. Stagecoach's Schedule 19 representations are included in Appendix A and that states that "Stagecoach, has been abundantly and consistently clear about its very serious concerns about the appropriateness of a local plan strategy that includes a remote new settlement at Sharpness".
- IX. Stagecoach and Atkins met on 9th January 2023, Atkins is able to confirm that currently there is no Statement of Common Ground between the Developers of the Sharpness Vales site and Stagecoach as the main road based public transport provider in the area. A note of this meeting is included in Appendix D.
- f. The Sustainable Transport Strategy (STS) lists a number of interventions for the site that will need to be incorporated into its design and layout and be delivered at an early stage. For instance, it identifies that sustainable transport movements should be prioritised over vehicle movements by providing high-quality and accessible cycling and walking routes, which connect to Quedgeley West Business Park and local community facilities on Green Lane. Are these requirements and the timing of their delivery sufficiently clear from the wording of the policy? Will sufficient suitable and available sustainable transport links connect the site with the surrounding area? **Not clear or supported – see Section 3 of TN 1 Sharpness regarding concerns about delivery of the STS proposed rail link and public transport links to Gloucester and Bristol. (Note the Green Lane and Quedgeley destinations are in association the STS provisions for 1200 units at Hardwicke).**
5. Has the effect of the development on the existing **Sharpness** Waste Water Treatment Works been adequately assessed? Will capacity improvement be required and if so, how will this be delivered and funded? **no additional response provided**
6. The text accompanying the policy acknowledges the site is near to areas subject to flooding and that the disposal of surface water flooding will need careful consideration to ensure that neither the development or adjoining areas are at risk of flooding or exacerbating existing areas of flooding. How will this be achieved? **no additional response provided**
7. Does the policy sufficiently ensure that the risk to existing flood risk management assets (due to climate change, rising sea levels and natural deterioration) will be addressed? **no additional response provided**
8. The policy refers to the development having ultrafast broadband to homes and businesses with top average speeds of 1Gbps. As this requirement would be delivered by a third party (Open Reach) and would be outside the control of the developers, is it justified and effective? **no additional response provided**
9. Has the potential of canal towpath degradation due to increased usage by future occupants of the development been considered? How would this issue be mitigated and addressed if necessary? **no additional response provided**
10. The text accompanying the policy lists a number of mitigation measures required due to the proximity of the site to the Severn Estuary SAC/SPA/Ramsar site. Taking account of these measures, will there be an effect on the developable area of the site that could impact on site densities or overall quantum of development? **no additional response provided**
11. Has full consideration been given to the impact of the proposal on other factors including the loss of agricultural land and local landscape and is this clearly set out in the evidence base supporting the Plan? **no additional response provided**
12. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities justified and effective? **no additional response provided**
13. How has the amount of employment land been determined and is this sufficient to ensure the site limits the need to travel and is self-sustaining? Are there job growth estimates and are these realistic? **no additional response provided**

14. How will phasing be used to ensure that employment land and local services and facilities, such as schools, are developed and completed in parallel with housing land completions? **no additional response provided as concerns with lack of sustainable transport options in general have been raised above – See Section 3 of TN 1. Land value capture to support business models for early provision of local services and employment land would be essential to support a garden community, but GCC did not raise this as an issue in their Regulation 19 response.**
15. Is the site boundary as shown on the policies map accurate? **no additional response provided**
16. General site layout / masterplanning questions:
 - a. Will the site be delivered in accordance with active design policies? **no additional response provided**
 - b. How will landscaping and layout address any visual impacts from the site’s development? **no additional response provided**
 - c. A comprehensive green infrastructure network is referred to in the text accompanying the policy. How will the policy ensure that this is designed and delivered as part of any future development proposal? How will this infrastructure be funded? **no additional response provided**
 - d. Design codes are referred to in order to ensure development is zero carbon and responds to the local context, specifically landscape and heritage elements. How and when will these design codes be brought forward? What will their status be? **no additional response provided**
17. Is the policy approach to the application of local standards for sports provision justified and effective? **no additional response provided** Should the policy define the required local provision depending on the size of development? **no additional response provided**
18. Will the HSE consultation on minimum distance for ammonium nitrate storage at **Sharpness Docks** impact upon the allocation? **no additional response provided**
19. The text accompanying the policy refers to community engagement and stewardship as being key to delivering a new community in line with garden city principles. How will this be achieved? **no additional response provided – see Section 3 of TN 1 Sharpness for comments on unsustainable nature of transport provision which does not support the garden cities principle where specifically the areas of concern that the Garden City Principles are not supported:**
 - **Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport**
20. Are there any barriers to the site coming forward as anticipated by the housing trajectory? Are delivery assumptions realistic? **no additional response provided**

Strategic Site Allocation Policy PS37 Wisloe new settlement (within the Berkeley Cluster)

Remainder of Matter 5 questions relate to Wisloe site – **No additional representation**

2.6. Matter 6 Site allocations

Issue 6 - Are the proposed housing, employment and mixed use site allocations justified, effective and consistent with national policy? No/Qu

2.7. Matter 7 Housing Provision

Issue 7 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy? Are the policies for housing development, including those to meet specific needs, sound? no additional response provided

2.8. Matter 8 Employment Provision

Issue 8 – Does the Plan set out a positively prepared strategy for the provision of employment land to meet identified needs within the Borough that is justified and effective. Are the policies for employment development sound? no additional response provided

2.9. Matter 9 Retail Provision and Town Centres

Issue 9 – Does the Plan set out a positively prepared strategy for the provision and delivery of retail development to meet identified needs within the Borough that is justified and effective. Are the policies for retail development and designated centres sound? no additional response provided

2.10. Matter 10 Environment

Issue 10 – Does the Plan set out a positively prepared strategy for the natural, built and historic environment that is justified, effective and consistent with national policy? Does the Plan adequately address other environmental matters and are the policies sound? no additional response provided

2.11. Matter 11 Infrastructure Provision and Viability

Issue 11 – Does the Plan set out a positively prepared strategy for infrastructure provision to meet the Plan’s development strategy and is this justified, effective and consistent with national policy? Are the policies relating to infrastructure sound? Is infrastructure provision viable?

No, see Section 3 of TN 1 Sharpness, but specifically the areas of concern are:

- I. Key parts of the transport proposals which would be needed to ensure the Development reduces the need for travel in private cars are not within the direct control of the Developer. These are specifically the proposed rail improvements proposed and the road-based bus public transport provision.
- II. There is no evidence of statements of common ground or commercial agreements in place between the Developer and local / national transport operators that demonstrate that the public transport provision by bus and rail will materialise nor with travel-planning service providers.
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 - o The appraisal of benefits has not been conducted in line with the DfT’s Transport Appraisal Guidance.
 - o Calculations for scheme demand have been undertaken by applying a set of Trip Rates to the existing land uses and proposed Sharpness Development, which implies a guaranteed rail usage. This is as opposed to the use of the strategic rail modelling using standard industry tools which would identify how likely any demand for the new service would be.
 - o There has been no estimation of the operational cost requirements for running services along the proposed route, nor have infrastructure costs been estimated in line with appropriate guidance.
- IV. No letters of support for delivering additional services in the area have been provided from either Network Rail or local bus operators since the 2020 discussions with the Developers of the Sharpness Vale site.
 - V. The proposals that the Developer has assumed will be delivered by Network Rail are not included in the *Bristol to Birmingham - rail corridor strategic study* and therefore are currently considered aspirational as they are unlikely to materialise.

- VI. The significant improvements to the road based public transport service proposals are also not within the direct gift of the Developer and would be likely to require significant financial support to ensure their commercial viability. This can be evidenced by GCC's ongoing subsidised Berkeley 62 bus service which continues to remain unviable, with a very high subsidy and generally low passenger usage.
- VII. GCC have commissioned their own assessment of the rail proposal by SLC Rail. The Rail Service Viability Report from SLC Rail (June 2021-V2) is included at Appendix C. In summary, the SLC observations are that, based upon the current situation, that there are considerable risks to the viability of the scheme which make it unlikely that it would gain the necessary approvals to progress to delivery.
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- IX. Stagecoach and Atkins met on 9th January 2023, Atkins is able to confirm that currently there is no Statement of Common Ground between the Developers of the Sharpness Vales site and Stagecoach as the main road based public transport provider in the area. A note of this meeting is included in Appendix D

2.12. Matter 11a Infrastructure – general questions

Infrastructure and Developer Contributions – Core Policy CP6

The policy seeks 'to ensure that infrastructure will be in place at the right time to meet the needs of the District and to support the development strategy.' . This is not specific to the Sharpness Vale Development site so has not been separately addressed in TN1. Additional information on highway mitigation and transport provision are addressed in TN3. Concerns about the Sharpness Rail and Bus infrastructure are set out above. There are concerns about the costings and delivery of M5 junction improvements that are set out in TN3.

2.13. Matter 11b Transport

Since the submission of the Plan and the production of the Council's Transport Topic Paper (EB6), technical updates on transport and viability have been published. This is not specific to the Sharpness Vale Development site so has not been separately addressed in TN1. Additional information on highway mitigation and transport provision are addressed in TN3. Concerns about the Sharpness Rail and Bus infrastructure are set out above. There are concerns about the costings and delivery of M5 junction improvements that are set out in TN3.

2.14. Matter 12 Monitoring and Implementation

Issue 12 – Is the Plan deliverable, capable of being effectively monitored and is it viable? No/Qu

3. Inspectors Matters, Issues and Questions specific to Whaddon

3.1. Matter 1 Compliance with statutory procedures and legal matters

Below is a full extract of the questions raised by the Planning Inspectors in reference to the issues of concern, or that required further investigation. The majority of the questions do not require a direct response from Gloucestershire County Council as the Highway and Transport Authority and have been marked below as **No/Qu** (no specific detailed questions) or **no additional response provided** (not applicable or not addressed) and the remainder that require further explanation of Gloucestershire County Council's Officer concerns are detailed in Technical Note 2.

Issue 1.1 – Has the Council met the statutory duty to cooperate as set out under Sections 20(5)c and 33A of the Planning and Compulsory Purchase Act 2004? No/Qu

Issue 1.2 – Has the Plan been prepared in accordance with other legal and procedural requirements? No/Qu

3.2. Matter 2 Spatial Strategy and site selection methodology

Issue 2 – Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives? Has the site selection process used an appropriate methodology that is based on proportionate evidence? No additional response provided

3.3. Matter 3 Housing need and requirement

Issue 3 – Is the identified housing need supported by robust and credible evidence, justified and consistent with national policy? Is the Plan's housing requirement of at least 12,600 dwellings justified and consistent with national policy? Is the Plan's approach to addressing some unmet housing needs for Gloucester soundly based? No/Qu

Gloucester's unmet housing need

The Plan, at paragraph 2.5.5, states that it 'addresses unmet needs from neighbouring Gloucester by allocating a site for 3,000 dwellings at Whaddon for delivery by 2040'. Core Policy CP2 identifies the location and proposed number of dwellings and Strategic Site Allocation Policy G2 states that the site is 'safeguarded' and includes specific requirements. The policy is subject to the site being required to meet Gloucester's housing needs and providing the location accords with the 'approved strategy' for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Review (JCS Review), which is currently in preparation. **No additional response provided**

8 When will it be determined whether the site at Whaddon would be required and when it would be consistent with the 'approved strategy' of the JCS Review? Would this be at the point of adoption of the JCS Review? Does the Plan clearly set this out and does this justify the need to allocate/safeguard this site now? **No additional response provided**

9 Overall, is the inclusion of land at Whaddon to meet the needs of Gloucester justified, effective and consistent with national policy? **No additional response provided**

3.4. Matter 4 Employment needs and requirement

Issue 4 – Are the identified employment needs supported by robust and credible evidence, justified and consistent with national policy? Is the Plan's proposal to accommodate 79 ha of employment land soundly based? No/Qu

3.5. Matter 5 New settlements at Sharpness and Wisloe

Issue 5 – Are the proposed new settlement allocations at Sharpness and Wisloe justified, effective and consistent with national policy? No the Sharpness allocation would not comply with para 104 and 105 of NPPF, in particular it is not in a location which is or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

3.6. Matter 6 Site allocations

Issue 6 - Are the proposed housing, employment and mixed use site allocations justified, effective and consistent with national policy? No/Qu

Matter 6e Gloucester’s rural fringe site allocations

Strategic Site Allocation Policy G2 Land at Whaddon

Further to our previous questions under Matter 3 on meeting Gloucester City’s unmet housing need and whether the principle of this site allocation as safeguarded land is soundly based, we have the following additional questions on the specific details within the policy.

- 40 The site is proposed to be ‘safeguarded’ to meet future housing needs of Gloucester City, if required. The policy seeks a development brief incorporating an indicative masterplan, that will address 22 listed requirements. This includes the provision of at least 3,000 dwellings, 8 serviced plots for travelling showpeople and necessary infrastructure. No/Qu
- a. If this is proposed as a safeguarded site and a decision on whether it would be allocated for development would be made through a future review of the Plan, why is it necessary at this stage to set out specific requirements for the site? No/Qu
 - b. Are all the 22 listed requirements justified by up to date robust evidence and are they sufficiently clear and effective in their level of detail? Do any duplicate other Plan policies and if so, why? No/Qu
 - c. Have all site constraints and development impacts been robustly assessed, particularly as regards highways and opportunities for sustainable modes of transport? No, the proposed measures are insufficient to ensure the impact on the highway is minimised, particularly at St Barnabas Roundabout, and the sustainable options have not been fully developed in respect of the severance issues linked to access across the railway line to support sustainable transport options (see below).
 - d. Are necessary infrastructure requirements and mitigation measures proposed within the policy and would these ensure the development was sustainable, particularly in terms of travel modes? See Technical Note 2 which highlights the concerns in respect to the delivery of the proposed highway interventions for the Whaddon development and in particular the impact on St Barnabas Roundabout
 - I. The off-site highways mitigation at St Barnabas roundabout currently proposed is not deliverable within the highway boundary and will require land take which is not in the Developers’ control. The preliminary design uses a ‘decide and provide’ assessment and has provided a solution that is car dominated not compliant with current design requirements included in the new LTN1/20 for cycling infrastructure and thus the proposed highway mitigation is not fully acceptable to GCC as the Highways and Transport Authority.
 - II. The highways mitigation proposed at Junction 12, although apportioned using industry standard methodology, has not been established as being deliverable within the Plan Period. Currently there is an absence of sufficient Statements of Common Ground to reassure GCC as the Highways and Transport Authority that there will be sufficient funds available to deliver the proposed highway mitigation. In addition, there are concerns that the construction cost figures for Junction 12 are underestimated and are not supported by sufficient evidence – See technical Note 3. If the plan is to be

reliant on government funding beyond that which can be viably supported by the allocations then that should be made clear.

- III. The current development proposals do not support sustainable transport options as no additional 'crossing points' of the railway line are proposed. The Developer currently proposes using Naas Lane as a modal filter for public transport and active travel use. However, safety concerns remain that this is not safe for pedestrians, cyclists and public transport service vehicles to use as it is a single-track road constrained by the railway bridge. The alternative option would be an intensification of use for the existing at Grade Crossing of the rail line which is also not safe or sustainable.
- e. Has the boundary been correctly drawn on the maps within the Plan (pages 155 and 160) and on the policies map? **No/Qu**
- f. Some representors raise other concerns relating to the development of the site, including the impact on wildlife, flooding and the character of the area and the recreational pressures on the AONB. Have such factors been suitably assessed as part of the process to allocate/safeguard this site? **No/Qu**

The site does not form part of the housing trajectory. If the site was found to be required to meet unmet housing needs, what would be its delivery timeframe and would this be realistic? **No/Qu**

3.7. Matter 7 Housing Provision

Issue 7 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy? Are the policies for housing development, including those to meet specific needs, sound? No additional response provided

3.8. Matter 8 Employment Provision

Issue 8 – Does the Plan set out a positively prepared strategy for the provision of employment land to meet identified needs within the Borough that is justified and effective. Are the policies for employment development sound? No additional response provided

3.9. Matter 9 Retail Provision and Town Centres

Issue 9 – Does the Plan set out a positively prepared strategy for the provision and delivery of retail development to meet identified needs within the Borough that is justified and effective. Are the policies for retail development and designated centres sound? No additional response provided

3.10. Matter 10 Environment

Issue 10 – Does the Plan set out a positively prepared strategy for the natural, built and historic environment that is justified, effective and consistent with national policy? Does the Plan adequately address other environmental matters and are the policies sound? -No additional response provided

3.11. Matter 11 Infrastructure Provision and Viability

Issue 11 – Does the Plan set out a positively prepared strategy for infrastructure provision to meet the Plan's development strategy and is this justified, effective and consistent with national policy? Are the policies relating to infrastructure sound? Is infrastructure provision viable? No specifically for Whaddon, the following concerns have been raised in Section 2 of TN 2:

- I. The off-site highways mitigation at St Barnabas roundabout currently proposed is not deliverable within the highway boundary and will require land take which is not in the Developers' control. The preliminary design uses a 'decide and provide' assessment and has provided a solution that is car

dominated and not compliant with current design requirements included in the new LTN1/20 for cycling infrastructure and thus the proposed highway mitigation is not fully acceptable to GCC as the Highways and Transport Authority.

- II. The highways mitigation proposed at Junction 12, although apportioned using industry standard methodology, has not been established as being deliverable within the Plan Period. Currently there is an absence of sufficient Statements of Common Ground to reassure GCC as the Highways and Transport Authority that there will be sufficient funds available to deliver the proposed highway mitigation. In addition, there are concerns that the construction cost figures for Junction 12 are underestimated and are not supported by sufficient evidence – See technical Note 3.
- III. The current development proposals do not support sustainable transport options as no additional ‘crossing points’ of the railway line are proposed. The Developer currently proposes using Naas Lane as a modal filter for public transport and active travel use. However, safety concerns remain that this is not safe for pedestrians, cyclists and public transport service vehicles to use as it is a single-track road constrained by the railway bridge. The alternative option would be an intensification of use for the existing at Grade Crossing of the rail line which is also not safe or sustainable.

3.12. Matter 11a Infrastructure – general questions

Infrastructure and Developer Contributions – Core Policy CP6

The policy seeks ‘to ensure that infrastructure will be in place at the right time to meet the needs of the District and to support the development strategy.’. This is not specifically addressed towards the Whaddon Development site so has not been separately addressed in TN2. Additional information on highway mitigation and transport provision are addressed in TN3 which raises concerns about the timely deliverability of the proposed highway interventions within the Plan Period. In relation to Whaddon specifically there are concerns about the funding and delivery of Junction 12 of the M5 improvements and the measures to reduce severance caused by the railway do not currently form part of the STS.

3.13. Matter 11b Transport

Since the submission of the Plan and the production of the Council’s Transport Topic Paper (EB6), technical updates on transport and viability have been published. This is not specific to the Whaddon Development site so has not been separately addressed in TN2. Additional information on highway mitigation and transport provision are addressed in TN3.

The specific areas of concern are:

- I. there seems to be a reliance on a proportionate allocation to a few large developments that may not be sound in other matters.
- II. there seems to be a reliance on a proportionate allocation to development sites and neighbouring authorities without an incremental modelling assessment, so that it is not clear how the proportions were derived, nor how the apportionment of background growth has been separately identified as this would relate to committed development.
- III. the apportionment to specific developments has not clearly identified the trigger points confirming when each of the improvements will need to be in place.
- IV. it is unclear if all transport interventions, both highway and public transport (rail and bus), have been clearly captured and priced for each development.
- V. the cost estimates of the proposed highway improvements have not been provided with sufficient detail to determine if all appropriate elements have been considered:- e.g. traffic management, construction, land costs (including land identified through CPO), design fees, etc.
- VI. the funding mechanisms for other transport interventions, particularly for the Sharpness Vale Development, rely on significant passenger numbers that have not been fully substantiated (See TN1) for both the rail interventions and the local road based public transport. It is unclear how the infrastructure and service providers will be required to make their contributions either through Section 106 Agreements or the Community Infrastructure Levy. Without this being clearly set out to ensure the

funding of the highway improvement schemes and other transport interventions come forward at the appropriate time, concern will remain over their timely deliverability.

- VII. There is no evidence that the required interventions on the Strategic Highway will be delivered in any future Road Investment Strategy (RIS) Period. The RIS 3 period would cover 2025 to 2030 and RIS 4 would cover 2030 to 2035 which would have a significant impact on the deliverability of the interventions proposed as part of the highway interventions for the Stroud LDP (plan period to 2040).
- VIII. The need for a series of Statements of Common Ground, confirming the details of the intervention and the full associated costs, would need to be in place to ensure the transport interventions will materialise and therefore remove the 'unsoundness' concerns that Gloucestershire County Council as the Highways and Transport Authority have with the evidence provided to the Examination in Public. There appears to be no "Plan B" if these Statement of Common Ground do not materialise.

3.14. Matter 12 Monitoring and Implementation

Issue 12 – Is the Plan deliverable, capable of being effectively monitored and is it viable? No/Qu

4. Inspectors Matters, Issues and Questions -Cost and Transport Interventions

Matter 1 Compliance with statutory procedures and legal matters

Below is a full extract of the questions raised by the Planning Inspectors in reference to the issues of concern, or that required further investigation, The majority of the questions do not require a direct response from Gloucester County Council as the Highway and Transport Authority and have been marked below as **No/Qu** (no specific detailed questions from the Inspectors) or **no additional response provided** (not applicable to GCC as the Highway and Transport Authority or further information required to be shared with the Inspectors) and the remainder that require further explanation of Gloucester County Council's Officer concerns are detailed in Technical Note3.

Issue 1.1 – Has the Council met the statutory duty to cooperate as set out under Sections 20(5)c and 33A of the Planning and Compulsory Purchase Act 2004? No/Qu

Issue 1.2 – Has the Plan been prepared in accordance with other legal and procedural requirements? No/Qu

2. Matter 2 Spatial Strategy and site selection methodology

Issue 2 – Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives? Has the site selection process used an appropriate methodology that is based on proportionate evidence? No/Qu

3. Matter 3 Housing need and requirement

Issue 3 – Is the identified housing need supported by robust and credible evidence, justified and consistent with national policy? Is the Plan's housing requirement of at least 12,600 dwellings justified and consistent with national policy? Is the Plan's approach to addressing some unmet housing needs for Gloucester soundly based? No/Qu

4. Matter 4 Employment needs and requirement

Issue 4 – Are the identified employment needs supported by robust and credible evidence, justified and consistent with national policy? Is the Plan's proposal to accommodate 79 ha of employment land soundly based? No/Qu

5. Matter 5 New settlements at Sharpness and Wisloe

Issue 5 – Are the proposed new settlement allocations at Sharpness and Wisloe justified, effective and consistent with national policy? No/Qu

6. Matter 6 Site allocations

Issue 6 - Are the proposed housing, employment and mixed use site allocations justified, effective and consistent with national policy? No/Qu

7. Matter 7 Housing Provision

Issue 7 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy? Are the policies for housing development, including those to meet specific needs, sound? No/Qu

8. Matter 8 Employment Provision

Issue 8 – Does the Plan set out a positively prepared strategy for the provision of employment land to meet identified needs within the Borough that is justified and effective. Are the policies for employment development sound? **No/Qu**

9. Matter 9 Retail Provision and Town Centres

Issue 9 – Does the Plan set out a positively prepared strategy for the provision and delivery of retail development to meet identified needs within the Borough that is justified and effective. Are the policies for retail development and designated centres sound? **No/Qu**

10. Matter 10 Environment

Issue 10 – Does the Plan set out a positively prepared strategy for the natural, built and historic environment that is justified, effective and consistent with national policy? Does the Plan adequately address other environmental matters and are the policies sound? **No/QU**

11. Matter 11 Infrastructure Provision and Viability

Issue 11 – Does the Plan set out a positively prepared strategy for infrastructure provision to meet the Plan's development strategy and is this justified, effective and consistent with national policy? Are the policies relating to infrastructure sound? Is infrastructure provision viable? **no additional response provided**

12. Matter 11b Transport

Since the submission of the Plan and the production of the Council's Transport Topic Paper (EB6), technical updates on transport and viability have been published. **Additional information has been provided in Sections 2 and 3 above for the Sharpness Vales and Whaddon development sites.**

Definition and scope of transport infrastructure required

2. Have all essential transport infrastructure elements been identified and does the Plan adequately address these needs in its identification of the scale and location of proposed development? Has the preparation of the Plan been consistent with paragraph 104 of the Framework which states that transport issues should be considered at the earliest stages of plan-making? **Transport issues have been considered from the earliest stages of the plan, but in GCC's opinion inadequate weight had been given to locational issues associated with the Sharpness allocation.**
3. In general terms will Core Policy CP6, the Infrastructure Delivery Plan (IDP) and other policies of the Plan, including allocation policies, ensure that necessary transport infrastructure will be delivered and in the right place and at the right time? **No – there is concern that the bus and rail interventions may not materialise for a number of sites within the require plan period (up to 2040). Specific representation on Sharpness and Whaddon are provide in TN1 and TN2 respectively. Concerns remain in respect the potential shortfall in funding for the various Infrastructure packages that is required from neighbouring Local authorities and developers (72.2%). In addition, there are concerns that the level of funding that has been identified may be too low as the cost estimates for Junction 12 and 14 are lower than previously suggested in the Transport Topic Paper (see TN3).**
4. Will the mitigation measures identified be sufficient to address the highway impacts identified? **No, the information provided on highway mitigation to date is conceptual and is not clearly defined. Generally the A38 packages are scalable and could be implemented, subject to land acquisition where necessary. The exception being St Barnabas roundabout which has serious constraints that is unlikely to support a car focussed mitigation package, it is GCC's preference that this is mitigated by more robust interventions at the Whaddon allocation if that is supported. There are concerns about the funding and hence timing and delivery of the M5 junctions 12 and 14. Therefore there is currently no certainty that the impacts at St Barnabas, Junction 12 and 14 of the M5 would accord with Para 111 of the NPPF.**

5. Is the Council satisfied that the Plan proposals would not have an unacceptable impact on highway safety or that the residual cumulative impacts on the road network would not be severe? **No, the information provided on highway mitigation to date is conceptual, is not clearly defined and does not have an agreed funding mechanism.. In addition, at the St Barnabas Roundabout there are concerns that the preliminary proposals to manage the development impact may have adverse affects.. Thus, causing an unacceptably severe impact on the highway which will in turn leave residual safety issues unresolved in contravention of NPPF paragraph 111.**

6. How will the Council work with infrastructure and service providers (including National Highways, developers, landowners and neighbouring authorities) to identify and address any impacts of proposed development, including through the use of contributions, CIL and through the implementation of any highway improvement schemes? **No additional response provided**

Demand management and sustainable travel measures – Core Policy CP13

7. Core Policy CP13 seeks to support major development subject to three transport related criteria. It also provides a further 4 criteria to be met by all development schemes. The policy also expects proposals to ‘consider all possible sustainable transport options’ before increasing the capacity of the road network and to be consistent with and contribute to the implementation of the agreed transport strategy. **No additional response provided on the Policy.**

a. Is the policy consistent with national policy which includes seeking to minimise the need to travel and promoting sustainable transport modes? **No additional response provided on the Policy.**

b. Does the policy set out clear requirements for sustainable transport provision? **No additional response provided on the Policy.** What is meant by the term ‘consider all possible sustainable transport options’? **No additional response provided on the Policy.** What are developers meant to do after they have considered such options? **No additional response provided on the Policy.**

c. Does the policy recognise that opportunities to maximise sustainable transport solutions may vary between urban and rural areas as recognised in paragraphs 85 and 105 of the Framework? How does this apply to Stroud District? **No additional response provided on the Policy.**

d. Are the criteria justified and effective? Is it clear how a decision-maker should determine future proposals against each of the relevant criteria? **No additional response provided on the Policy.**

e. Is the reference to ‘having regard to ... the Council’s adopted (parking) standards’ appropriate? Are these the standards set out in Appendix C? **No additional response provided on the Policy.** Is the policy clear on this and are the standards justified? **No additional response provided on the Policy.**

f. Is the requirement to be consistent with the transport strategy justified? **No additional response provided on the Policy.**

g. How does this policy relate to Delivery Policy E112? Are the policies consistent? Is there unnecessary or confusing duplication between these policies? **No additional response provided on the Policy.**

Promoting transport choice and accessibility – Delivery Policy E112

8. The policy seeks to promote transport choice and accessibility.

a. The policy requires parking standards and principles for development to be provided to the adopted standards in Appendix C. Is this requirement consistent with Core Policy CP13 which only requires regard to be had to the standards? Is the policy clear and are the standards justified and consistent with national policy? **No additional response provided on the Policy.**

b. How does this policy relate to Core Policy CP13? Are the policies consistent? Is there unnecessary or confusing duplication between these policies? **No additional response provided on the Policy.**

District-wide mode-specific strategies – Delivery Policy DE11

9. The policy describes what the Council's intention is in relation to working with key partners rather than setting clear policy requirements for development? Can the Council explain the purpose of the policy? **No additional response provided on the Policy.**

Protecting and extending our walking and cycling routes – Delivery Policy EI13

10. The policy includes not permitting development where it would significantly harm an existing walking or cycling route or prejudices the proposed routes as listed. What is meant by 'significant harm' and are the 8 listed routes justified? Are these clearly identified on the policies map? **No additional response provided on the Policy.**

11. Overall, is the policy justified, effective and consistent with national policy? **No additional response provided on the Policy.**

Provision and protection of rail stations and halts - Delivery Policy EI14

12. Is the policy justified, effective and consistent with national policy? **No additional response provided on the Policy.**

Protection of freight facilities at Sharpness Docks - Delivery Policy EI15

13. Is the policy justified, effective and consistent with national policy? **No additional response provided on the Policy.**

Provision of public transport facilities - Delivery Policy EI16

14. Is the policy justified, effective and consistent with national policy? **No additional response provided on the Policy.**

Delivery and viability

15. Does the viability evidence supporting the Plan make realistic assumptions about costs? **No – specific concerns regarding the cost assumptions have been raised above and in TN 3. The specific areas of concern are:**

- I. there seems to be a reliance on a proportionate allocation to a few large developments that may not be sound in other matters.
- II. there seems to be a reliance on a proportionate allocation to development sites and neighbouring authorities without an incremental modelling assessment, so that it is not clear how the proportions were derived, nor how the apportionment of background growth has been separately identified as this would relate to committed development.
- III. the apportionment to specific developments has not clearly identified the trigger points confirming when each of the improvements will need to be in place.
- IV. it is unclear if all transport interventions, both highway and public transport (rail and bus), have been clearly captured and priced for each development.
- V. the cost estimates of the proposed highway improvements have not been provided with sufficient detail to determine if all appropriate elements have been considered:- e.g. traffic management, construction, land costs (including land identified through CPO), design fees, etc.
- VI. the funding mechanisms for other transport interventions, particularly for the Sharpness Vale Development, rely on significant passenger numbers that have not been fully substantiated (See TN1) for both the rail interventions and the local road based public transport. It is unclear how the infrastructure and service providers will be required to make their contributions either through Section 106 Agreements or the Community Infrastructure Levy. Without this being clearly set out to ensure the funding of the highway improvement schemes and other transport interventions come forward at the appropriate time, concern will remain over their timely deliverability.

- VII. There is no evidence that the required interventions on the Strategic Highway will be delivered in any future Road Investment Strategy (RIS) Period. The RIS 3 period would cover 2025 to 2030 and RIS 4 would cover 2030 to 2035 which would have a significant impact on the deliverability of the interventions proposed as part of the highway interventions for the Stroud LDP (plan period to 2040).
- VIII. The need for a series of Statements of Common Ground, confirming the details of the intervention and the full associated costs, would need to be in place to ensure the transport interventions will materialise and therefore remove the 'unsoundness' concerns that Gloucestershire County Council as the Highways and Transport Authority have with the evidence provided to the Examination in Public. There appears to be no "Plan B" if these Statement of Common Ground do not materialise.

16. The Transport Funding and Delivery Plan (July 2022) (TFDP) identifies three transport mitigation packages. These are:

M5 Junction 12:

- improvements to M5 J12 (a new grade-separated junction);
- Improvements to the A38 / A430 / B4008 'Crosskeys' Roundabout; and
- Improvements to the B4008 / Stonehouse junction.

M5 Junction 14: comprising improvement to M5 J14 (a new grade-separated junction) and dualling of the B4509 between M5 J14 and A38.

A38 Corridor (This package includes the following number of individual junctions which have been identified for highway capacity improvements in the Traffic Forecasting Report (EB61)):

- A38 / Grove Lane;
- A38 at Claypits;
- A38 / B4066;
- A38 / B4066 Berkeley Road;
- A38 / Alkington Lane; and
- A38 / A4135.

Are these mitigation measures necessary and justified? Do they represent a comprehensive set of mitigation measures required to support the levels of growth set out in the Plan? **No additional response provided**

17. As regards the proposed dualling of the B4008 and new park and ride:

- a. Should these be included in the M5 J12 mitigation package? **No additional response provided**
- b. Is it reasonable and realistic to expect the dualling of the B4008 to be delivered as part of the Javelin Park extension site? Has a scheme been identified and costed to deliver this piece of infrastructure? Are there any implications for the delivery of the Javelin Park extension site? For example, is it necessary for this scheme to be delivered at a particular stage of the development and is that achievable? **No additional response provided**
- c. If the new park and ride scheme is still at scoping stage does this have implications for the viability and deliverability of the Plan? **No additional response provided**

18. The TFDP sets out indicative costs for the three schemes (page 5). For the M5 J12 scheme this is £9,437,500; the M5 J14 scheme is £27,246,837; and the A38 package is £3,812,500. Are these indicative costs realistic and do they provide a reasonable basis upon which to consider the viability of delivering the growth set out in the Plan? **No – the specific areas of concern are:**

- I. there seems to be a reliance on a proportionate allocation to a few large developments that may not be sound in other matters.
- II. there seems to be a reliance on a proportionate allocation to development sites and neighbouring authorities without an incremental modelling assessment, so that it is not clear how the proportions were derived, nor how the apportionment of background growth has been separately identified as this would relate to committed development.
- III. the apportionment to specific developments has not clearly identified the trigger points confirming when each of the improvements will need to be in place.

- IV. it is unclear if all transport interventions, both highway and public transport (rail and bus), have been clearly captured and priced for each development.
- V. the cost estimates of the proposed highway improvements have not been provided with sufficient detail to determine if all appropriate elements have been considered:- e.g. traffic management, construction, land costs (including land identified through CPO), design fees, etc.
- VI. the funding mechanisms for other transport interventions, particularly for the Sharpness Vale Development, rely on significant passenger numbers that have not been fully substantiated (See TN1) for both the rail interventions and the local road based public transport. It is unclear how the infrastructure and service providers will be required to make their contributions either through Section 106 Agreements or the Community Infrastructure Levy. Without this being clearly set out to ensure the funding of the highway improvement schemes and other transport interventions come forward at the appropriate time, concern will remain over their timely deliverability.
- VII. There is no evidence that the required interventions on the Strategic Highway will be delivered in any future Road Investment Strategy (RIS) Period. The RIS 3 period would cover 2025 to 2030 and RIS 4 would cover 2030 to 2035 which would have a significant impact on the deliverability of the interventions proposed as part of the highway interventions for the Stroud LDP (plan period to 2040).
- VIII. The need for a series of Statements of Common Ground, confirming the details of the intervention and the full associated costs, would need to be in place to ensure the transport interventions will materialise and therefore remove the 'unsoundness' concerns that Gloucestershire County Council as the Highways and Transport Authority have with the evidence provided to the Examination in Public. There appears to be no "Plan B" if these Statement of Common Ground do not materialise.

19. The TFDP states that following discussions with National Highways, neither the M5 J12 or M5 J14 schemes are likely to attract funding from the Road Infrastructure Strategy (RIS) in the foreseeable future. Is that assumption still valid? Have all external sources of national funding for these schemes been fully explored? **No additional response provided**

20. In the absence of national funding being available, the TFDP sets out a proposed apportionment methodology which would seek to take account of external growth from neighbouring authorities (including Gloucester, Cheltenham, Tewkesbury and South Gloucestershire). The TFDP goes on to explain that at this stage, the scale, location and nature of growth in these Districts is uncertain due to their respective Plan's being at an earlier stage of development. Nevertheless, modelling assumptions have been made in order to take account of growth from neighbouring Districts.

a. Were neighbouring Districts involved in discussions to develop these modelling assumptions and has any agreement been reached on this issue (such as Statements of Common Ground)? **No additional response provided**

b. In looking at housing growth assumptions and the split between major and minor/windfall development it is noted that this was derived from housing delivery data from Stroud District. Was this a reasonable and realistic assumption to make? Are patterns of housing delivery data between Stroud and neighbouring authorities sufficiently similar to make this assumption valid? **No additional response provided**

c. The TFDP goes on to apportion background growth between neighbouring authorities developments based on these assumptions. Table 7 sets out the results of the apportionment exercise. M5 J12 is set out as 38% Stroud and 62% from neighbouring authorities; M5 J14 is 20% from Stroud and 80% from neighbouring authorities; A38 Corridor is 60% from Stroud and 40% from neighbouring authorities. It would therefore appear that the majority of funding required for these infrastructure schemes is expected to be provided by neighbouring authorities, presumably sourced from developer contributions. Are these assumptions realistic or reasonable? Is there a realistic prospect of this funding coming forward to deliver the infrastructure required? **No additional response provided**

d. Have discussions with neighbouring authorities taken place regarding the apportionment of these costs? **No additional response provided** Has any formal agreement been reached? **No additional response provided** How would funding for these schemes be collected and distributed? **No additional response provided**

response provided Which Council would lead the co-ordination and provision of these infrastructure schemes? No additional response provided

e. How would the global figure assigned to neighbouring authorities be broken down at the individual district level? No additional response provided

f. Is the level of funding that is expected to be sourced from developments in neighbouring authorities realistic and is there a reasonable prospect of it being secured during the lifetime of the Plan? No additional response provided If not, are there any implications for the delivery of the Plan? No additional response provided

g. Are any of the schemes identified reliant on land in third party ownership for their delivery? No additional response provided If so have discussions with relevant land owners taken place? No additional response provided If necessary, have realistic acquisition costs been included when calculating likely scheme costs? No additional response provided

h. The TFDP distributes the growth apportioned for Stroud District to 12 site allocations. Is the scale and distribution of costs reasonable? No additional response provided Is there agreement that the costs set out are reasonably accurate? No additional response provided Have viability considerations been appropriately considered? No additional response provided

i. The TFDP states that sites delivering over 150 dwellings were considered capable of contributing towards strategic mitigation packages. How was this threshold set? Is it justified? No additional response provided

j. If agreement on the apportionment of growth to neighbouring authorities cannot be reached, or if it is found that Stroud should meet a greater proportion of the cost of these schemes would there be implications for the deliverability and viability of these allocations? No additional response provided

k. Equally, if agreement cannot be reached would failure to deliver the infrastructure schemes during the plan period affect delivery assumptions for these allocations? No additional response provided

l. Are any allocations or development reliant on the delivery of any of these schemes at a particular point during the plan period? There is not specific timescales or trigger points in the Plan for the mitigation measures, so there it is assumed that all are needed before the end of the Plan Period in 2040. For example we note comments from National Highways that improvements to Junctions 12, 13 and 14 of the M5 are likely to be required early in the plan period. If so, is a lack of identified funding likely to affect delivery assumptions in the Plan? No additional response provided

21. The Sustainable Transport Strategy (STS) Addendum (July 2022) lists 14 interventions to be included in the STS Addendum (Table 2.2). The schemes include a number of significant infrastructure projects that are referred to in the Plan including public transport for a strategic park and interchange hub scheme for M5 J12 and a new railway station (s) south of Gloucester, north of Bristol. Under funding status, all the interventions state 'still required'.

a. Has any funding been identified to support the delivery of these interventions? No additional response provided

b. Reference is made to a Strategic Outline Business Case (SOBC) being produced for a potential rail station at Stonehouse which will test options and deliverability. What are the timescales for this piece of work and when is it expected to be completed? No additional response provided If the SOBC concludes that a new station would not be viable would there be any implications for the Plan? No additional response provided

c. Are any allocations or development reliant on the delivery of any of these schemes at a particular point during the plan period? There is not specific timescales or trigger points in the Plan for the mitigation measures, so there it is assumed that all are needed before the end of the Plan Period in 2040 If so, is a lack of identified funding likely to affect delivery assumptions in the Plan? Yes - see TN3

d. Are these interventions expected to be delivered during the plan period and if so how will they be funded? **No additional response provided**

22. The STS Addendum also refers to land being safeguarded for the potential rail stations at Stonehouse and Charfield. The Stonehouse site is safeguarded through Delivery Policy EI14, but Charfield is not included. Is there sufficient evidence available at this stage in the process to justify safeguarding land for these two potential stations? **No additional response provided** Are they likely to be delivered during the plan period? **No additional response provided**

13. Matter 11c Other Infrastructure

25. In general terms will Core Policy CP6, the IDP and other policies of the Plan, including allocation policies, ensure that other necessary infrastructure will be delivered in the right place and at the right time? **No additional response provided** Are the requirements clearly set out and are they justified and consistent with national policy? **No additional response provided**

14. Matter 12 Monitoring and Implementation

Issue 12 – Is the Plan deliverable, capable of being effectively monitored and is it viable? **No/Qu**