

## Part B – Please use a separate sheet for each representation

Name or Organisation:

Robert Hitchins Ltd

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="√"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="√"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="√"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

### **PS36 Sharpness new settlement**

Pegasus on behalf of Robert Hitchins Ltd (RHL) object to the proposed new settlement/community at Sharpness, the allocation is considered to be unsound, it is not justified, effective and is not consistent with national policy. Our objections focus on the following points:

1. Location
2. Delivery- trajectory, garden towns
3. Sustainability Appraisal
4. Transport
5. Traffic Modelling
6. Infrastructure Delivery Plan

7. Flood Risk
8. Economic Strategy
9. Viability

### **Summary**

A summary is provided of our detailed representations – it is necessary to make these points in full at this stage as these will form the basis of any future Hearing Statements. Representors are required to ensure that all their evidence is provided with their original representations (para 3.18 of the PINs Procedure Guide for Local Plan Examination (March 2021))

- In December 2018, SDC declared a Climate Emergency and made a commitment to carbon neutrality by 2030.
- The Stroud Sustainable Transport Strategy confirms that in order to address the Housing Crisis and Climate Emergency, accessible, sustainable transport needs to be placed at the heart of planning for growth and recognise it as fundamental to policy-shaping and decision-making.
- Paragraph 103 of the NPPF (2019) states that significant development 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.
- The proposed new settlement/community at Sharpness is not a location which is considered sustainable, neither does it have potential to become sustainable development nor does it support the Strategic Objectives of the emerging Local Plan.
- Three main movement corridors have been identified by the Stroud Sustainable Transport Strategy, where integrated packages of initiatives can be delivered, which can “showcase multimodal use with a focus on sustainable travel modes” and underpin the allocation of sites for strategic development in the emerging Local Plan. The strategy recognises that it is important to focus limited resources where the greatest benefits can be achieved.
- Sharpness is a location which is some significant distance from the main movement corridors and major centres of employment and it is therefore considered that it cannot provide a sustainable opportunity for development.
- The Stroud Sustainable Transport Strategy acknowledges that Sharpness has an issue of “relative remoteness” (page 29), particularly in public transport terms. This is echoed in the Infrastructure Delivery Plan, which goes on to state that this increases demand for private car use.
- Because of the scale of development, remoteness of the location and likely spread of workplace destinations, the commercial case to provide a relevant bus or coach-based public transport service from Sharpness is questioned by both Gloucestershire County Council, in its role as local highway authority, and Stagecoach, a highly experienced public transport operator.
- The re-opening of the Sharpness branch line for rail passenger services is required to underpin the transport offer from Sharpness. However, there is no evidence to demonstrate that this can be delivered and it therefore cannot be guaranteed.
- The traffic modelling evidence under plays the traffic impacts on the wider highway network from the proposed allocation at Sharpness. Further mitigation to that identified in the ‘Preferred Highway Mitigation Strategy’ would likely be required should the development traffic reductions assumed by the sustainable travel interventions and/or the assumed distribution patterns not be realised.

- In contrast to Sharpness, the omission site of Grove End Farm, Whitminster, is located at the hub of main movement corridors as identified in the Stroud Sustainable Transport Strategy and is favourably located in relation to employment opportunities including at Stonehouse, Stroud and Gloucester. Locating development on existing or potential high-quality public transport corridors represents some of the most sustainable options for any development strategy.
- The approach is not consistent with concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure; neither is it consistent with concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth.
- A housing trajectory does not accompany the Plan. The only information that has been prepared is Table 6 on page 306 of the Plan, this table includes a figure for each 5 year period. As set out below these assumptions are disputed. No lead in times for infrastructure provision and services are provided. Pegasus considers that there are significant deliverability issues at this location and consequently it will not assist in meeting the districts housing needs.
- It is not clear what planned investment is proposed and its timing and delivery or indeed the viability as this is not addressed in the IDP. The IDP does not set out all the infrastructure required for each of the strategic sites.
- The Employment Land Review does not support the location for future employment development, instead it states that the best option is land at Grove End Farm, Whitminster.
- Based on the uncertainty of effects on habitats likely to be used by qualifying bird species of the Severn Estuary Special Protection Area and the efficacy of the proposed mitigation measures (particularly in the context of climate change) it is considered that the proposed PS36 allocation does not meet the legal requirements of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations") as amended by the Conservation of Habitats and Species Amendment (EU Exit) Regulations 2019.
- In respect of a new community at Sharpness it is considered that due to the level of environmental designations and constraints in and around the proposed development area, which will require extensive mitigation, this will have a significant impact on viability and hence deliverability of the proposal. In turn this may also impact on the ability of this proposed development to deliver other policy requirements of the plan.

### **1. Location**

The Plan proposes a new garden community/new settlement at Sharpness. Policy PS36 proposes a new garden village at Sharpness with up to 2,400 dwellings by 2040 and 10 hectares of employment, community uses and a new secondary school and another phase of development by 2050 totalling 5,000 dwellings. A new rail station enabling rail services to Cam and Gloucester and "*direct ...coach/bus services to key destinations including Bristol and Gloucester and contributions towards extending local bus services.*"

Pegasus object to the proposed development, for a number of reasons, including its location, as it is not within the key movement corridors identified in the Stroud Sustainable Transport Strategy (February 2021) prepared by AECOM, and it is not considered to be deliverable in the plan period.

The Sustainable Transport Strategy acknowledges that Sharpness has an issue of remoteness (page 29), particularly in public transport terms, there is a lack of a regular bus service to the area. The

STS states that this “remoteness” could assist with internal self-containment, however, this is not evidenced or justified and could actually create social and economic isolation.

The adopted Local Plan (2015) focusses on identifying those settlements that offer the best opportunities for sustainable development, this emphasis on sustainability is continued in the Local Plan review, however with the climate change agenda becoming a priority issue, (the Council having declared moving the district towards becoming Carbon Neutral by 2030) there is even more of a focus on sustainable and deliverable development.

The Priority Issues in the Pre-Submission Plan (May 2021), page 11 states that:

***“Ensuring new development is located in the right place, supported by the right services and infrastructure to create sustainable development, including by:***

- concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure;***
- creating new sustainable communities at locations where development can transform existing access to services and infrastructure;***
- concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth.”***

As set out in our representations below it is considered that the proposed new community at Sharpness will not address these priorities.

It is considered that meeting the housing needs of the district is not well served by proposing a major allocation at Sharpness. Such an approach is not consistent with concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure; neither is it consistent with concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth. Pegasus considers that there are significant deliverability issues at this location and consequently it will not assist in meeting the districts housing needs.

Whilst the NPPF (2019) acknowledges that large scale development can assist in delivering the housing needed, the important factor is that such locations should be well located and designed and supported by the necessary infrastructure and facilities and meet needs in a sustainable way.

NPPF paragraph 72 (2019)

***“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should: (my emphasis)***

***a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;***

**b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;**

**c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;**

**d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations);<sup>35</sup> and**

**e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.”**

<sup>35</sup> The delivery of large scale developments may need to extend beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset. Anticipated rates of delivery and infrastructure requirements should, therefore, be kept under review and reflected as policies are updated.

It is considered that the proposed new community at Sharpness does not satisfy the first part of paragraph 72 as it is not well located within the key movement corridors identified in the Stroud Sustainable Transport Strategy (February 2021) prepared by AECOM, and it is not considered to be deliverable in the plan period. The Sustainable Transport Strategy acknowledges that Sharpness has an issue of relative remoteness, particularly in public transport terms, there is a lack of a regular bus service to the area. The IDP prepared by ARUP June 2021 page 14, acknowledges that the site is geographically separate from the rest of the district. **“Highway improvements were required to enable access, including the creation of an access from Oldminster Road and reinstating the bridge crossing. Improvements to bus connectivity were seen as being required.”** It is not clear from the evidence base how the infrastructure will be delivered.

The following paragraphs response to the bullets points in paragraph 72 from the NPPF (2019):

**a) “consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;”**

No opportunities are presented by existing investment in infrastructure

It is not clear what planned investment is proposed and its timing and delivery or indeed the viability as this is not addressed in the IDP. Separate representations by Pioneer address the issue of viability.

The area is not consistent with the SEP strategy which focuses on the M5 corridor.

The Employment Land Review does not support this location as the best option for employment growth (see section below).

The sheer scale of the PS36 allocation and proximity to the Severn Estuary Special Protection Area (SPA) / Special Area of Conservation (SAC) / Ramsar Site and Site of Special Scientific Interest (SSSI) means that adverse effects on the qualifying / interest features of these designations is inevitable (particularly in combination with the PS34 allocation). Paragraph 5.17 of the Habitats Regulations Assessment (HRA) of the Stroud District Local Plan Review Pre-submission Draft Plan (23 May 2021) highlights that there is uncertainty as to the degree of risk of loss of supporting habitat (functionally-linked land) given the evidence of current occasional

usage of some of the fields within the PS36 proposed allocation site by qualifying species of the SPA/Ramsar. Whilst the HRA goes on to suggest that the uncertainty 'should' be resolved by provision of a Nature Reserve case law associated with the Habitats Regulations makes it clear that a plan or project may be authorised only if no reasonable scientific doubt remains as to the absence of effects. Reasonable scientific doubt will exist if the evidence is not sufficiently conclusive, or if there are gaps in the information (the 'Sweetman' case : Sweetman v An Bord Pleanala (C-258/11) [2014]). With regard to PS36, it is considered there are gaps in the information (further surveys required to establish use of the site by qualifying bird species) and a lack of the required 'certainty' as acknowledged within the HRA.

Similarly, paragraph 6.51 of the HRA raises further uncertainty with regard to the diversion of the Severn Way (to avoid recreational effects on the Berkely Pill roost, other roosts and the intertidal feeding areas within the SPA/Ramsar) as changes to the Public Right of Way network can only be brought about as the result of a procedure involving a legal order. As the PS36 development is dependent upon this mitigation being implemented, until this measure is made certain, it would not be appropriate to allocate the site in the context of the requirements of the Habitats Regulations.

The gaps in required information is further highlighted by the Local Plan Review: Infrastructure Delivery Plan (2021) Main Report (1 June 2021) (IDP). On page 94 it is stated "**Concerns were raised by Natural England during consultation in May 2021 that as population concentrations increase in proximity of the Severn Estuary, the likely impacts are to increase in intensity. The Covid-19 pandemic may have also altered habits and intensified impacts upon designated sites. This reiterates the need to update mitigation strategies. The developer for the Garden Village has developed a schematic proposal for a combined approach for suitable alternative natural green space (SANGs) and onsite open space, however work is ongoing to develop a baseline of bird survey data to understand whether this proposal for a new nature reserve close to the sea wall would be sufficient.**"

Page 95 the IDP goes on to state "**In advance of the further work needed to understand recreational impacts upon designated sites, it has been estimated that development would be required to contribute £1.69m towards the Severn Estuary Mitigation Strategy.**"

As such, the statutory authority is clear that there is not currently sufficient baseline data to support the allocation and ascertain effects on the integrity of the Severn Estuary. As already highlighted, such uncertainty and gaps in information would be contrary to the requirements of the Habitats Regulations.

**b) "ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;"**

The location is considered to be unsustainable and will not be self-sufficient in terms of facilities and services and consequently increase journey trips.

- c) ***“set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;”***

No comments

- d) ***“make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and”***

A housing trajectory does not accompany the Plan. The only information that has been prepared is Table 6 on page 306 of the Plan, this table includes a figure for each 5 year period. As set out below these assumptions are disputed. No lead in times for infrastructure provision and services are provided.

- e) ***“consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.”***

No comments

The Settlement Role and Function Study Update – May 2019 states at paragraph 3.34 that:

***“It is crucial that the bulk of future housing growth is planned, in order to make the most of opportunities to sustain or boost communities’ existing services and facilities and to enable people to access services and facilities elsewhere.”***

This statement is echoed in the STS (page 19 no paragraph numbers) which states that:

***“It is important that the people in future developments are not limited by their choice of sustainable travel modes and can connect to the key centres in the District with ease.”***

Paragraph 3.35 (of the Settlement Role and Function Study Update) in this context states that:

***“Careful planning should aim to:***

- ***Avoid sporadic development that offers little to sustain or boost existing communities.***
- ***Focus growth towards those settlements that have better access to services, facilities and infrastructure.***
- ***Support some growth in locations where there is the best chance to obtain coordinated improvements to community infrastructure, services and facilities as a direct result of development.***
- ***Support some growth in locations where there is the best chance to bring about coordinated improvements to accessibility, connectivity and public transport as a direct result of development.***
- ***Target and tailor future development in settlements where the vitality and viability of services and facilities may be under particular pressure from demographic or socio-economic trends.***

- **Establish appropriate limitation on the amount, scale and nature of any development at inaccessible lower tier settlements.”**

It is considered that Sharpness does not accord with the settlement strategy, neither does it address the bullet points above. Furthermore the Settlement Strategy acknowledges at paragraph 4.48 that:

***“Employment growth targeted towards the south of the District and the Berkeley Vale might help to moderate the relatively high levels of southward out-commuting seen amongst the populations of Berkeley, Newtown & Sharpness, Wotton-Under-Edge, Kingswood and North Nibley. However, the proximity of M5 J14 and particularly Bristol will always be a factor in drawing residents out of the District to work (and to access services and facilities).” My emphasis.***

## **2. Delivery, trajectory and garden towns/communities**

The NPPF (2019) states that plans should be prepared positively, in a way that is aspirational, but deliverable.

There is no housing trajectory showing anticipated dwellings per year included in the Plan, instead Table 6 on page 306 sets out the number or anticipated dwellings in 5 year periods.

It is noted that Table 6 anticipates 500 dwellings being delivered in the period 2025 to 2030 and in the subsequent five years a further 750 dwellings and in the final five years of the plan period, 1,150 dwellings. It is considered that this trajectory is unrealistic, it is widely acknowledged that although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times.

The Lichfield Study – “Start to Finish” Update February 2020 concluded that **“The average time from validation of an outline application to the delivery of the first dwelling for large sites ranges from 5.0 to 8.4 years dependent on the size of the site, i.e. beyond an immediate five year period for land supply calculations.”**

Figure 4 of the Study shows that for a site with 2000+ dwellings the average time from validation of the first planning application to the first dwellings being completed is 8.4 years

In which case for Sharpness assuming an application was submitted later this year in 2021, the first dwelling on site could be late 2029/early 2030 at best. In which case 500 dwellings would not be delivered by 2030.

The study concluded that **“Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations.”**

Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. In the last 5 years of the plan period the trajectory envisages 230 dwellings per annum, this was only achieved in two schemes considered in the NLP/Lichfield Study – Cranbrook and the Eastern Expansion Area of Milton Keynes. In both cases there were specific circumstances that led to higher rates of delivery.

The trajectory assumes increasing delivery rates for Sharpness, this is contrast to research by Lichfields. Their research has concluded that delivery rates are not steady. In the latest research



the average annual build rate for schemes of 2,000+ dwellings is 160 dwellings per annum. The research found that higher rates may occur between years five to ten after these sites have had to “ramp up”.

The research acknowledges that there may well be specific factors that mean a specific site will build out faster or slower than the average, however, no sites have been able to consistently delivery 300 dwellings per annum. The research found that the most significant point in terms of build rates is that because of economic cycles larger sites which build out over five years or more are inherently likely to coincide with a period of economic slowdown at some point during their build out. ***“It therefore makes sense for housing trajectories for such sites to include an allowance for the prospect that, at some point, the rate of build out may slow due to a market downturn, albeit the effect may be smaller than one might suspect.”***

The research concluded for large sites that are likely to span more than a decade, that the timing and rate of phases will be determined by a range of factors including: the characteristics of individual sites, the physical layout of the site, the ability to sell the homes; trigger points for payment for key social and transport infrastructure obligations; the economic cycle; and local market issues.

Consequently, as there is no housing trajectory included in the evidence base as part of the Reg 19 Pre-Submission consultation, it is considered that insufficient evidence has been provided to justify the delivery and trajectory for Sharpness, this undermines the soundness of the Plan.

In respect of a new community at Sharpness it is considered that due to the level of environmental designations and constraints in and around the proposed development area, which will require extensive mitigation, this will have a significant impact on viability and hence deliverability of the proposal. In turn this may also impact on the ability of this proposed development to deliver other policy requirements of the plan, indeed because of the extensive mitigation required and along with all the other abnormally high costs at this location; the proposed allocation is therefore unsound.

### **3. Sustainability Appraisal**

In our previous representations to the Reg 18 version of the Local Plan we have stated that in terms of Sharpness the area has a long history, a site was allocated for 300 dwellings in the adopted Local Plan, in 2017 an outline application was submitted, but has yet to be determined ( it is noted from the Council website that until 29<sup>th</sup> June 2021, Highways England had a holding objection to the site. This has now been replaced by a recommendation for a number of conditions). Recent correspondence from Biodiversity Team states that the proposal which includes 300 dwellings would result in significant impacts to the Severn Estuary SPA and has recommended further mitigation (26<sup>th</sup> May 2021). Furthermore it is not clear what the demand is for businesses to locate at Sharpness as the Strategic Economic Plan focuses on the M5 around junctions 9, 10, 11 and 13.

The SA prepared by LUC for the Draft Local Plan (May 2021) supports the focus on the Tier 1 settlements for strategic growth (para 4.53). Paragraph 4.68

***“Directing much of the strategic growth to Tier 1 settlements (Cam and Stonehouse) as well as to the Gloucester fringe area is likely to ensure that most new residents will have a good level of access to existing healthcare facilities and areas of open space, as well as education facilities and cultural facilities. Opportunities to walk or cycle to access services and facilities and employment opportunities are also likely to be greater in those areas. In contrast, strategic growth at new***

***settlements (Sharpness and Wisloe) could leave new residents without immediate access to a wide range of existing services and facilities during the early stages of development. The critical mass provided is likely to support the delivery of new services and facilities as well as the delivery of supporting infrastructure through S016/CIL contributions, which will help to satisfy the needs of residents once the sites are built out.*** (my emphasis)

However, the SA alerts the Council to the fact that in the early years at the new settlements, new residents could be left without the access to the wide range of facilities and services and a lack of public transport; in which case these settlements will become reliant upon the private car. Whilst the SA indicates that the critical mass to support the delivery of new facilities and services will be obtained through S106/CIL contributions, the IDP (June 2021) does not provide the list of infrastructure required and the expected delivery programme and cost. It is noted in the conclusions of the IDP that it recommends that the Council should prepare an Infrastructure Funding Statement in accordance with the PPG. (Whilst the IFS prepared is dated December 2020 it does not relate to the emerging Local Plan. There is no justification for the policy requirements and consequently this undermines the delivery of the Plan). The PPG Plan Making states ***“The government recommends that when preparing a plan strategic policy-making authorities use available evidence of infrastructure requirements to prepare an Infrastructure Funding Statement. This should set out the anticipated funding from developer contributions, and the choices local authorities have made about how these contributions will be used. At examination this can be used to demonstrate the delivery of infrastructure throughout the plan-period.”***

Paragraph: 059 Reference ID: 61-059-20190315

Whilst there is an IDP that supports the Plan, there is no complete Schedule of Infrastructure Delivery Requirements, consequently it is not transparent.

The SA (paragraph 4.71) also alerts the Council to the implications of the delivery of 2,400 dwellings at Sharpness as this location is in close proximity to the Severn Estuary SSSI/SPA/SAC/Ramsar site and therefore there is potential for adverse impacts on these internationally designated sites.

The SA serves to further highlight the uncertainties (as highlighted previously in this representation) of the negative effects of the potential PS36 allocation on the Severn Estuary as is evident from the scoring under SA7 (Biodiversity) with ‘?’ cited alongside mixed significant effects. As already pointed out, such uncertainty is contrary to the requirements of the Habitats Regulations where such significant effects could arise.

The SA concludes that significant positive effects are expected in relation to SA Objective 16 employment and SA Objective 17 Economic Growth; this is in direct conflict with the Employment Land Review (ELR) which concludes that ***“For the new community at Sharpness, PS36 there is limited evidence of how, and by whom delivery would be achieved and similarly for the new settlement at Wisloe, PS37 much more planning is required as to how, by whom and to what timescale.”***

#### **4. Transport**

Paragraph 103 of the NPPF (2019) states that: ***“The planning system should actively manage patterns of growth in support of these objectives. Significant development 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.”***

The proposed new settlement/community at Sharpness is not a location which is considered sustainable, neither does it have potential to become sustainable nor does it support the Strategic Objectives of the emerging Local Plan for the reasons set out below.

The Stroud Sustainable Transport Strategy, (STS) referred to above states that the topography and settlement pattern of the district results in high levels of demand being funnelled along key movement corridors. Three main movement corridors are identified where integrated packages of initiatives can be delivered, which can “showcase multimodal use with a focus on sustainable travel modes.”

Importantly it is noted that:

**“These corridor packages enable movement by all modes, in all directions and, with interchanges, provide connections to other destinations.” (my emphasis)**

Such an approach accords with the NPPF (2019) paragraphs 102 and particularly 103 which states that:

**“Significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” (my emphasis)**

The STS states that:

**“It is important to focus limited resources where the greatest benefits can be achieved.”**

Given the above it is imperative that locations for development are deliverable and offer a real choice of transport modes and that resources are focussed where they can achieve the greatest benefits, on or adjacent to the main movement corridors would be in accordance with the STS. It is considered that development at Sharpness, a location which is some significant distance from the key movement corridors and major centres of employment cannot provide a sustainable opportunity for development.

**Figure 1** shows the location of Sharpness in relation to the main movement corridors as identified in the STS. This demonstrates that Sharpness is poorly located in relation to the main movement corridors. In respect of centres of employment, **Figure 2** shows the location of Sharpness in relation to workplace population, a proxy for employment opportunities. Clearly Sharpness is also poorly located in relation to employment opportunities. In contrast, the omission site of Grove End Farm, Whitminster, is located at the hub of movement corridors as identified in the STS and is favourably located in relation to employment opportunities including Stonehouse, Stroud and Gloucester. Locating development on existing or potential high-quality public transport corridors represents some of the most sustainable options for any development strategy. Opportunities to build on these corridors by increasing service frequency and reliability will ensure public transport is highly competitive with car use.

We are aware from previous representations submitted by Stagecoach that it has stated that in reality travel demands from the site at Sharpness will be split across a number of relatively distant journey destinations, such that there would be insufficient critical mass of demand for passenger transport on any one corridor. This is demonstrated by the workplace destinations of existing residents of Sharpness and Berkeley, which, as shown diagrammatically in **Figure 3**, are spread widely across Stroud District and neighbouring authority areas. This is in strong contrast to the workplace destinations of existing residents in Whitminster, which, as shown in **Figure 4**, are much

more aligned with the main movement corridors leading to Stonehouse and Stroud to the east and Gloucester to the north.

The relative proximity to junction 14 (which is highly constrained and acknowledged in the STS to have capacity issues) would enable commuting by car to be the very likely option for residents given that there would not be a sufficiently frequent or direct public transport service. Consequently, the traffic impacts from the development will have significant impacts on the operation of the local and national highway networks, which will further compound delays from congestion and affect and undermine the reliability of bus services.

The evidence in support of the promotion of Sharpness confirms that car is by far the dominant mode in regard to journeys to work from Sharpness with 88% mode share and only 2% by public transport, highlighting the lack of public transport options. This could be improved by investing in alternative modes of transport, but given the site's remoteness, there is a limit to what can be realistically achieved. It is considered that car driver will remain a dominant mode of transport particularly for journeys to work from Sharpness. Figure 5 shows the workplace population within 15 minute and 30 minute drive of Sharpness, which is around 7,000 and 195,000 respectively. By way of comparison, Figure 6 shows the workplace population within 15 minute and 30 minute drive of Whitminster, which is around 49,000 and 372,000 respectively. The workplace populations within 15 minute and 30 minute for Sharpness and Whitminster are also set out in the table below.

**Table of Workplace Population within 15 Minute and 30 Minute Drivetimes**

Site	Workplace Population within 15 Minutes	Workplace Population Within 30 Minutes
Sharpness	6,871	195,326
Whitminster	49,017	371,808

Source: 2011 Census

A comparison of workplace population within 5km cycling distance reveals that Sharpness is relatively poorly located in relation to employment opportunities within cycling distance when compared with Whitminster as shown in **Figure 7**, which shows that the workplace population within cycling distance of Sharpness is around 1,600 and Whitminster is around 9,200. The workplace populations within cycling distance for Sharpness and Whitminster are also set out in the table below.

**Table of Workplace Population within 5km Cycling Distance**

Site	Workplace Population within Cycling Distance
Sharpness	1,579
Whitminster	9,173

Source: 2011 Census

It is on this basis that it is considered likely that residents of development at Sharpness would typically have to travel further to access jobs than from a development on or adjacent to the main movement corridors, such as at Whitminster, where improvements to facilitate travel by alternative more sustainable modes of transport would also be much more readily achieved providing the greatest benefits with the limited resources available.

Furthermore 2,400 dwellings are less likely to achieve any significant levels of self-containment.

Evidence in support of the promotion of Sharpness has provided some initial estimates of trip generation at peak times and assigned the destination for these journeys. This has been undertaken only for the full build out, i.e. 5,000 homes, 10 hectares of employment and on-site school, shopping and leisure and estimates around 5,100 person trips in the morning peak hour, and 4,500 in the evening. Around 2,200 and 1,800 of these trips are estimated to remain on-site in the morning and evening respectively. These 'internal' trips would represent around 40% of the total person trips, which suggests a very high degree of trip containment. However, during the early stages of the commencement of the development neither employment or a wide range of facilities and services will be available on the development site, or within reasonable walking or cycling distance, unlike other locations proposed for development in the Draft Plan and the omission site of Grove End Farm, Whitminster, and it is therefore considered unlikely that the degree of trip containment suggested by the promotor would be achieved, particularly during the early phases of the development up to the end of the plan period.

In its representations (January 2020) to the Reg 18 version of the Local Plan, Gloucestershire County Council, the local highway authority, stated:

***"...given its geographic location, transport options and solutions for a new settlement in Sharpness may remain limited."***

Policy LTP PD 0.1 - Reducing Transport Carbon Emissions and Adapting to Climate Change, bullet 12 states that GCC will work with its partners to reduce transport carbon emissions by 2045 and improve air quality in the county by addressing travel demand, promoting the use of sustainable modes of transport and the uptake of ultra-low emission vehicles to tackle climate change by:

***"Make a positive contribution towards a step change in sustainable land use planning to enable a priority towards sustainable travel choices and reduce travel demand, while supporting digital connectivity to improve agile working"*** (my emphasis)

Core Policy CP5 - Environmental development principles for strategic sites, point 3 states that strategic sites will:

***"Be readily accessible by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities; and will contribute towards the provision of new sustainable transport infrastructure to serve the area, in seeking to minimise the number and distance of single purpose journeys by private cars"*** (my emphasis)

Core Policy CP13 - Demand management and sustainable travel measures, roman i states that in all development cases, schemes shall:

***"i) be located where there are, or will be, at the time of development, choices in the mode of transport available and which minimise the distance people need to travel"*** (my emphasis)

For the reasons set out above, it is considered that the allocation of land at Sharpness for development would not constitute sustainable land use planning, would not be readily accessible by bus and would not be located where there are or will be choices in the mode of transport

available, which minimise the distance people need to travel and would therefore be contrary to Policy LTP PD 0.4 of the adopted Local Transport Plan and Core Policies CP5 and CP13 of the emerging Local Plan and not in accordance with the NPPF (2019).

### **Bus public transport**

The STS acknowledges that Sharpness has an issue of relative remoteness (page 29), particularly in public transport terms. This is echoed in the IDP (June 2021 page 27), which goes on to state that this increases demand for private car use.

The evidence in support of the promotion of Sharpness confirms that there is one bus service, the 62, which provides a two-hourly service between Gloucester (approximately an hour and half journey time) and Bristol (approximately one-hour journey time). This level of public transport service is very unlikely to compete with the private car.

**Figure 8** shows the location of Sharpness in relation to existing bus routes by frequency. By way of comparison, the location of Whitminster is also identified on the plan. This demonstrates very well the relative lack of existing bus public transport provision in relation to Sharpness compared to Whitminster, which from September 2021 will be well served by bus public transport running at least every 30 minutes, to both Stonehouse and Stroud, and Quedgeley and Gloucester. Not only that it is located next to the single most important node between two of the main Movement Corridors where integrated packages of initiatives can be delivered, at low opportunity cost. This makes Whitminster one of the locations that could be best placed to “showcase multimodal use with a focus on sustainable travel modes” as envisaged by the STS. England’s new national bus strategy, bus back better, confirms that:

**“Buses are the easiest, cheapest and quickest way to improve transport. Building a new railway or road takes years, if not decades. Better bus services can be delivered in months. Experience shows that relatively small sums of money, by the standards of transport spending, can deliver significant benefits.”**

This supports the strategy of focusing development on the main movement corridors where existing or potential high-quality public transport corridors can be bolstered by additional patronage, rather than at Sharpness where new and bespoke infrastructure and services would be required.

The STS identifies that direct and attractive public transport services would be needed to key destinations, including Bristol and Gloucester and these services would be needed from a very early stage and would also need to be more attractive than the use of the private car for comparable trips. The promoter of Sharpness proposes a bespoke express coach service to be provided on a flexible basis as the solution. However, because of the scale of development, remoteness of the location and likely spread of workplace destinations, the commercial case to provide a relevant bus or coach-based public transport service from Sharpness is very questionable, which arises directly from its limited likely relevance and impact.

In its representations (January 2020) to the Reg 18 version of the Local Plan, Gloucestershire County Council stated:

***“This level of development [Phase 1: 2,400 dwellings by 2040 and Phase 2: additional 2,600 dwellings by 2050] is unlikely to be sufficient enough to create that critical mass for investment in***

***measures to support transport mode shift that would see the high levels of sustainable transport accessibility aimed for by the plan.”***

Furthermore, we are aware from previous representations submitted by Stagecoach that it sees no commercial case to provide a relevant bus or coach-based public transport service from Sharpness, on the basis of the proposals advanced by the promoters, including the bespoke facility proposed by the promoter.

Gloucestershire County Council LTP Policy PD 0.4 – Integration with Land Use Planning and New Development, bullet 1 states:

***“Development will be resisted where the impact on the transport network requires retrofitting or where safe and suitable access is not provided. GCC will support new compact, high density mixed use development of new sites already served by public transport over other more remote and inherently less sustainable locations”*** (my emphasis)

Delivery Policy EI12 ‘Promoting transport choice and accessibility’ states:

***“...Development should be located in areas which are already well served by public transport and have access to a range of local facilities within walking and cycling distance...”*** (my emphasis)

For the reasons set out above, it is considered that the allocation of land at Sharpness, an inherently less sustainable location, over sites already served by public transport, such as the omission site of Grove End Farm, Whitminster, would be contrary to Policy LTP PD 0.4 of the adopted Local Transport Plan and Delivery Policy EI12 of the emerging Local Plan. The commercial case for a relevant bus or coach-based public transport service from Sharpness is in question; this undermines the soundness of the inclusion of this location in the Plan.

### **Rail public transport**

The promoters of Sharpness set out a ‘Rail Strategy’ which states that the re-opening of the Sharpness branch line for passenger services would underpin the transport offer from Sharpness Vale with a service between a new station at Sharpness and Gloucester with an intermediate stop at Cam & Dursley. This service is expected to operate with a half hourly service. The STS states that the applicant has advised that the re-opening of the railway branch line for passenger services is feasible and can deliver an attractive train service to Gloucester. However, the latest promoter material states that the rail line re-opening to passenger services needs to be subject to further and on-going work. There is no evidence to demonstrate that the re-opening to passenger services can be delivered and it therefore cannot be guaranteed.

The ‘Rail Strategy’ would necessitate the service on the branch line joining the main line and occupying train paths that would otherwise be available for improvements to the longer distance services and the frequency of local rail services between Bristol and Gloucester/Cheltenham and possibly to Ashchurch as referred to below. It is not clear how the proposal by the promoters of Sharpness would affect the aims of increasing the frequency of services to Gloucester and Bristol which are referred to in the emerging LTP.

The GFirst LEP Draft Gloucestershire Local Industrial Strategy (2019) also refers (on page 69) to Gloucestershire’s Connecting Places Strategies (CPS), building on recent investment by Government and the LEP in:

- ***“Committing to the Bristol MetroWest Phase 2, which will double the frequency of rail services to Gloucester, to provide half-hourly services to Bristol.”***

(Although the Local Industrial Strategy had been signed off by central Government it was not published due to the COVID pandemic, so the only published version is that dated 2019.)

The GFirst LEP Draft Gloucestershire Local Industrial Strategy concludes with a Statement of what is needed for the County, this includes:

***“To develop a rail strategy to ensure that rail travel provides a viable alternative to the private car for travel within the county, between its key towns, and to other parts of the country.***

***As part of this we will seek to:***

- ***increase the frequency and passenger capacity of services between Gloucestershire and London, Bristol and Birmingham;***
- ***link with the planned MetroWest service to deliver direct services to and from Bristol; and***
- ***ensure Tewkesbury Garden Town is adequately linked to the rail network.”***

Consequently, it is not clear from the promoters of the Sharpness Garden Village how their proposals would affect the wider objectives of the Gloucestershire Local Industrial Strategy and the Gloucestershire LTP.

The LTP outlines a vision for Growth in Central Gloucestershire. Paragraph 4.8.14 states:

***“Transport infrastructure will have a key role in enabling delivery of this vision for cyber as well as the significant wider business and housing growth. This does not only mean the provision of a functioning, high quality and reliable transport network to provide mobility within this new City Region, but also high quality and fast access to key destinations in the City Region and beyond. Mass transit systems will play their part; systems such as; light rail, high frequency bus routes and guided busways.”***

The LTP refers to the continued functioning of the M5 as a reliable and fast link providing regional connectivity but this will be supported by a transport strategy that will also see a significant shift in demand from the M5 to the Birmingham to Bristol rail link that runs in parallel to the M5.

It is envisaged that strategic interchange hubs at all M5 motorway junctions, all railway stations and some other key locations will link the core public transport corridor and these high frequency, high quality bus services to long distance travel opportunities.

The LTP states that the rail network in this area offers great potential for growth, into the centre of Bristol from Cam and Dursley Station and from Stonehouse, or Stroud to London. Recent improvement to journey times and frequency to London have been made and the LTP refers to an ambition that service frequencies at Cam and Dursley Station would increase to three trains per hour in the future. Such a strategy supports further growth in and around Cam and Stonehouse being sustainable locations served by public transport rather than at Sharpness where existing transport infrastructure is limited in comparison.



The evidence in support of the promotion of Sharpness confirms that the nearest rail station to the site is Cam and Dursley Station, located approximately 11km from the site. The most likely means of travel to access the nearest rail station is therefore by car.

In its representations (January 2020) to the Reg 18 version of the Local Plan, Gloucestershire County Council stated:

***“In particular, demand for a Rail link at Sharpness will be inherently compromised. It is still not known whether there is sufficient network capacity to accommodate a new service to Gloucester from Sharpness or whether it is financially viable or value for money. In addition, the evidence provided suggests that approx. 60% (AM) and 40% (PM) of trips would be made into south Gloucestershire and Bristol, which would not be served by the introduction of a direct link to Gloucester, but would have to change at Cam and Dursley Station. GCC is undertaking some further modelling work, to understand the viability of a new rail service from Sharpness to Gloucester via Cam and Dursley and we will feedback the outcomes of this modelling exercise, once available. It is also understood that Network Rail is currently looking at the line capacity between Sharpness and Gloucester for additional services which will also be crucial evidence to understand the viability of the proposed rail link. Even if it is demonstrated that there is network capacity, it must also be demonstrated how this would impact upon Gloucestershire’s wider ambitions for increasing frequencies on other regional or high speed services.”***

The IDP (June 2021 page 16) refers to the Gloucestershire Rail Investment Strategy (March 2020), this identifies a number of key corridors with a set of potential improvements which could be made to each of them, Sharpness and Severn bridge are included.

Page 29 of the IDP states that a bid has been submitted as part of the “Restoring Your Railway Fund” which seeks to re-open the Sharpness branch line to passenger services. The bid was submitted to the DfT by Vale of Berkeley Railway Charitable Trust and Sharpness Development LLP and Stroud District Council, under Round 3 in March 2021. It is nothing more than a funding bid for Government support for initial studies up to Network Rails GRIP (Governance for Railway Investment) Stage 2 Project Feasibility. GRIP Stage 3 is Option Selection, which starts to isolate a preferred option to progress to detailed design, and Stage 4 is Single Option Development, at which stage outline designs are produced, and technical or legal issues that could ‘cancel’ an option or a project are usually identified. It will not, therefore, provide designs to a degree of resolution that will allow realistic costs to be assigned, which takes place at GRIP Stage 5 Detailed Design. A successful RYRF Bid does not, in fact, establish deliverability, or cost, much less a business case. The bid, far from proving the deliverability of a rail-based solution, in fact exposes how the proposals are little more than hypothetical meaning that there is considerable uncertainty whether the outcome will ever happen as defined by Table 4.1 of the Stroud Local Plan Traffic Modelling – Traffic Forecasting Report, March 2021. The level of funding and costs involved and the timescale to delivery of any rail-based intervention at Sharpness remains quite speculative. It is not clear on the level of funding and costs involved and the timescale if it is to support PS36 which is a remote location and not sustainable. The development concept at Sharpness Vale relies on this to address the remoteness of its location and resulting tendency towards car-dependent development.

Page 29 of the IDP reports that ***“Concerns were raised in the Gloucestershire Rail Investment Strategy that whilst the reopening of the line could provide sustainable transport to Sharpness and enable significant growth in the area, analysis shows a very limited GVA impact for a very costly new piece of infrastructure. This was also reflected in the comments from Network Rail and GCC Highways. It is understood Sharpness Development LLP has commissioned Network Rail to***

***undertake a capacity study to determine the impact of reopening the branch line on existing services."***

A Restoring Your Railway: Ideas Fund Application Form, in respect of the use of the Sharpness Branch Line for passenger services, has been uploaded to the Local Plan Review Evidence website. A review of the form confirms that an Outline Business Case (OBC) supports the bid and that the OBC is not currently compliant as further work is needed. The application is for funding from the Restoring your Railway fund to allow a 'fully compliant' Strategic Business Case to be developed. If the bid is successful, then SDC would then tender the next stages of research and business case development work. The form states that the output would be a Strategic Business Case that could be submitted to secure funding for the project and a clear programme and delivery strategy.

The Restoring Your Railway bid confirms that without the successful adoption of the Local Plan, the demand for passenger service on the branch line would fall away, as the growth point would provide the majority of potential passengers for the service. The form also states that if the project was not taken forward, the opportunities for sustainable growth at Sharpness would be stifled and there may be a need for increased highway infrastructure.

Under 'Project Dependencies and Risks', the Restoring Your Railway bid sets out a 'preliminary list' of dependencies and constraints. It is envisaged that the formal Strategic Business Case would bring clarity to some but may identify others. The preliminary list includes: Sources of Funding, Local Plan Delivery, Planning Risks, Railway Operations (GWR franchise and timetabling issues and overlap with South-west Metro proposals), Gloucester (pressure for improvements) and Patronage.

A timetable modelling study has been undertaken as part of the OBC, but the Restoring Your Railway bid confirms that timetabling constraints may be different in a few years' time when the services come to be introduced, and the 'risks and issues' faced by the project, as set out in the bid, include changes to mainline traffic, which could impact on the deliverability of the scheme over time.

The Restoring Your Railway bid acknowledges concerns raised by the County Council regarding the interaction of the growth point and railway development; their concerns being that the scheduled passenger trains may never arrive at Sharpness, or that, if they do, they would be too late in the development programme to achieve transformational change. The form confirms that these concerns are valid.

Capital costs are set out in the bid, but they are obscured on the version of the form available to the public. By obscuring this critical information in the document that has been made available to the public makes it impossible to analyse. The capital costs alone could render the entire scheme unviable and undeliverable. Each rail project is unique and costs vary accordingly. By way of example:

- Borders Railway - Re-opening of a section, between Edinburgh and Tweedbank, of the former Waverley Route, which was closed in 1969. 35 miles, single track with three passing loops and 7 Stations. Re-opened in 2015. Cost £294m (2012 prices). Circa £8.4m per mile.
- Cirencester Community Railway - Proposal to re-instate a rail route between Cirencester and Kemble that was closed in the 1960s. The provision would be by way of a 'Very Light Railway' (lightweight, energy efficient rail vehicles that offer low manufacturing and operational costs) operating on a 3.5 mile single track. Early days but a guide figure of £52m has been given for the project. Circa £14.9m per mile.

Upgrading of the Sharpness branch line would require around 4 miles of track improvements. Applying the cost per mile from the Borders Railway and Cirencester Community Railway projects above to the upgrading of the branch line would result in a range in cost from around £35m to £60m. The example projects involve/d working on closed lines. The Sharpness branch line is a live freight line with associated constraints on the carrying out of works, which would require possessions/blockades affecting contractors' timeframes, which could have significant cost implications.

The form confirms that subsidies to operational costs could be required for fifteen years after opening with the first train envisaged in 2025. The project programme envisages two stages of delivery with the first train (hourly service) to Gloucester being delivered 'as soon as possible' and the second train (half hourly service) being added by the time of the next Local Plan being approved in around 2035, which the form states would deliver a further 2,600 homes at Sharpness.

There is no guarantee that the current bid will be successful and, if it is, the funding it secures would be towards a formal Strategic Business Case, which, as set out in the form, may bring clarity to some project dependencies and risks, but may also identify others.

A fundamental concern with the Rail Strategy is that the OBC is based on the potential patronage derived from Stantec's Sharpness Vale – Transport Technical Appraisal (June 2021), which has taken a 'first principles' approach rather than the 'industry standard' approach utilising TRICS multi-modal data derived from surveys reflecting the use of the various transport modes at existing sites in operation. It is also based on a development of 5,000 dwellings and 10 Hectares of employment land rather than the 2,400 dwellings envisaged over the Local Plan period.

Stantec's Transport Technical Appraisal states: **"In order to determine the mode share for trips from Sharpness Vale, we have had to adopt an essentially first principles approach. The traditional approach has been to extrapolate trends forwards from historic data – but we believe that this is flawed, as it perpetuates the outcomes that are an inherent part of the philosophy of adding highway capacity and allowing unfettered use of the private car. If we are to break this cycle, we will have to start deriving mode share parameters that are closer to what we are planning and providing for, and not so much about continuing historic trends, which are based on behaviours that we want to change."**

To provide a comparison of Stantec's first principles approach with the industry standard TRICS approach, two tables have been produced setting out the morning and evening peak hour trip generation and mode share, based on a development of 5,000 dwellings and 10 Hectares of employment land as set out below.

**Sharpness New Settlement Trip Generation by Mode (Two-Way) – 5,000 dwellings and 10 Hectares of employment land - Stantec First Principles Approach**

Time Period	Internal Trips	External Trips				Total
	Walk/Cycle/ Micro-mobility	Bus/Coach	Rail	Vehicle Passenger	Vehicle Driver	
<b>Trip Generation</b>						
AM Peak Hour (08:00 – 09:00)	2,196	1,471	524	336	543	5,070
PM Peak Hour (17:00 – 18:00)	1,771	1,313	517	343	527	4,471
<b>Mode Share</b>						
AM Peak Hour (08:00 – 09:00)	43%	29%	10%	7%	11%	100%
PM Peak Hour (17:00 – 18:00)	40%	29%	12%	8%	12%	100%

Note: Based on 5,000 dwellings and 10 Hectares [40,000sqm GFA 50% Business Park/50% Industrial Estate] of Employment Land  
 Assumes all internal trips are by walk/cycle/micro-mobility as per Section 6.2 'Internal Trips' of Stantec's Transport Technical Appraisal, June 2020  
 Trip generation obtained from Tables 12 and 34 of Stantec's Transport Technical Appraisal, June 2020

**Sharpness New Settlement Trip Generation by Mode (Two-Way) – 5,000 dwellings and 10 Hectares of employment land - TRICS Approach**

Time Period	Walk	Cycle	Bus	Rail	Vehicle Passenger	Vehicle Driver	Total
<b>Trip Generation</b>							
AM Peak Hour (08:00 – 09:00)	545	87	113	42	1,513	2,756	5,056
PM Peak Hour (17:00 – 18:00)	408	122	78	36	1,237	2,578	4,459
<b>Mode Share</b>							
AM Peak Hour (08:00 – 09:00)	11%	2%	2%	1%	30%	55%	100%
PM Peak Hour (17:00 – 18:00)	9%	3%	2%	1%	28%	58%	100%

Note: Based on 5,000 dwellings and 10 Hectares [40,000sqm GFA 50% Business Park/50% Industrial Estate] of Employment Land  
 Trip generation based on TRICS outputs taken from Appendix B of Stantec's Highway Capacity Assessment, October 2020

From a comparison of the two tables, it can be seen that Stantec's first principles approach leads to inflated levels of rail use, which would be over ten times the number that would be expected based on the industry standard TRICS approach. Similarly, bus, walk and cycle use would be exceptionally high and vehicle driver trips would be over 2,000 less than would be expected.

The potential patronage set out in the OBC is taken from Chapter 8.0 'Rail Strategy' of Stantec's Transport Technical Appraisal. The rail demand from the completed Sharpness Vale development is set out in Table 36 and is 306 two-way in the AM Peak Hour and 335 two-way in the PM Peak Hour. It is not clear why the demand is lower than 524 in the AM Peak Hour and 517 in the PM Peak Hour as set out in Table 34 of Stantec's report and reflected in the table above. With that said, the demand is still significantly greater than would be expected based on the TRICS approach. In addition, the rail demand from the existing community has been included on the basis of a 3% mode share, which is three times the mode share based on TRICS. The total rail demand of the completed Sharpness Vale development and existing community in the OBC is 393 in the AM Peak Hour and 413 in the PM Peak Hour.

Stantec's first principles approach, which underpins the rail business case, is highly speculative and idealistic. It relies upon exceptionally high levels of uptake of sustainable modes of transport in a remote location where the necessary services and infrastructure do not currently exist and the demand necessary to justify rail, and/or bus/coach, services is unlikely to materialise. There is uncertainty over the Rail Strategy, it is subject to further and on-going work, and it is on this basis that it is considered that allocating land at Sharpness for development represents a high risk that could work against SDC's commitment to carbon neutrality by 2030.

It is considered that the detail of rail information critical to understanding the deliverability of the new community does not exist. There appears to be no certainty, clarity of what is proposed or the timing of the provision of new infrastructure to support the proposed allocation; consequently, the allocation is not justified and effective and the inclusion of the new community at Sharpness seriously undermines the soundness of the Plan.

## 5. Traffic Modelling

A review of the Stroud Local Plan Traffic Modelling – Traffic Forecasting Report, March 2021, reveals that significant highway mitigation will be needed to reduce the impacts of traffic growth associated with the Local Plan.

For the Sharpness area the modelling identifies large traffic flow increases on the various routes connecting Sharpness with the A38; whilst most of this traffic is shown to use the B4066 notable increases are shown on the minor routes through Stone to the south and Breadstone to the north.

Significant increases are shown on the A38 and at M5 Junction 14 which is forecast to have significant congestion without mitigation.

Highway Mitigation identified for the Sharpness area includes:

- A38 / B4066 (ID17) – junction signalised
- A38 / Breadstone (ID18) – no improvements to avoid rat-running traffic on inappropriate road
- A38 / B4066 Berkeley Road (ID19) – junction signalised
- A38 at Stone (ID20) - no improvements to avoid rat-running traffic on inappropriate road
- A38 / Alkington Lane (ID21) – junction signalised
- B4066 / Station Road (ID22) – widening on B4066 approach
- A38 / A4135 (ID23) – widening on A38 northbound approach
- A38 / Wick Road (ID24) – no improvements as junctions improved elsewhere
- B4066 / Alkington Lane (ID30) – junction signalised
- M5 Junction 14 (ID25 & ID26) – new grade separated all movements interchange

From the above it is clear that significant highway mitigation is needed to accommodate the additional traffic from the strategic allocations at Sharpness.

M5 Junction 14 currently experiences significant congestion at peak times which will be further exacerbated with Local Plan demand. As such a significant improvement scheme comprising a new all movement grade-separated junction incorporating two overbridges is proposed as part of the 'Preferred Highway Mitigation Strategy'. Such an improvement would be very costly and would take time to deliver particularly as it is not currently in a capital programme and no funding sources have yet to be identified. The timing of the works would likely affect the delivery of development at Sharpness, as given the existing capacity issues the improvement would be needed prior to any significant scale of development.

A review of the traffic modelling methodology has been undertaken with respect to the allocation at Sharpness. The modelling has assumed a significant level of self-containment at Sharpness (18% reduction to residential trip rates in the AM peak and 10% reduction in the PM peak). This reflects the on-site employment and secondary school. Following an allowance for self-containment vehicle trips have been distributed onto the modelled highway network.

The residential distribution (Appendix H - Table H.1) reveals that the traffic modelling has assumed nearly a quarter of all vehicle trips (23%) from the allocation at Sharpness (PS36) to be to the Berkeley area. This figure appears high given the relatively few jobs within the Berkeley area, as is evident from the plan showing workplace populations at **Figure 2**. This pattern of local trip distribution has also been applied to the proposed employment at Sharpness with the employment distribution (Appendix H - Table H.2) showing 26% of vehicle trips from Berkeley.

Further reductions have been applied to vehicle trips for the strategic allocations to account for proposed sustainable travel interventions set out in the STS. Appendix K of the modelling report reveals that for trips to/from Gloucester and Bristol a 20% reduction has been applied for trips to/from the Sharpness site (PS36) to reflect the proposed “direct public transport services to key destinations including Bristol, Gloucester and employment nodes”. This percentage reduction is significantly greater than all the other Local Plan strategic allocations where reductions of between 3% - 10% have been applied reflecting contributions and support for public transport services. It is unclear why Sharpness has been assumed to have a greater potential for transfer to public transport than the other Local Plan sites, particularly given its isolated location away from the sustainable movement corridors, greater travel distances and the disparate range of employment destinations for journeys to work.

The modelling does however recognise the feasibility concerns associated with the potential re-opening of the Sharpness railway branch line for passenger services with no further reductions in car trips allowed for this element in the model forecasts.

Based on the above, the modelling potentially under plays the traffic impacts on the wider highway network from the proposed allocation at Sharpness. Further mitigation to that identified in the ‘Preferred Highway Mitigation Strategy’ would likely be required should the development traffic reductions assumed by the sustainable travel interventions and/or the assumed distribution patterns not be realised

## **6. Infrastructure Delivery Plan (IDP)**

The latest version of the IDP prepared by ARUP is dated June 2021.

The PPG Plan Making Paragraph: 059 Reference ID: 61-059-20190315 states that the government recommends that when preparing local plans an Infrastructure Funding Statement is prepared.

***“This should set out the anticipated funding from developer contributions, and the choices local authorities have made about how these contributions will be used. At examination this can be used to demonstrate the delivery of infrastructure throughout the plan-period.***

***Authorities will also need to ensure that policies setting out contributions expected from development do not undermine delivery of the plan. Plan viability assessment should be carried out in accordance with guidance.***

***Where plans are looking to plan for longer term growth through new settlements, or significant extensions to existing villages and towns, it is recognised that there may not be certainty and/or the funding secured for necessary strategic infrastructure at the time the plan is produced. In these circumstances strategic policy-making authorities will be expected to demonstrate that there is a reasonable prospect that the proposals can be developed within the timescales envisaged.”***

Section 15 of the IDP (page 176) advises the District Council to use the IDP to inform the preparation of an Infrastructure Funding Statement in accordance with Planning Practice Guidance (Plan-making, paragraph 16160). ***“This should set out the anticipated funding from developer contributions, and the choices local authorities have made about how these contributions will be used.”*** The Infrastructure Funding Statement (IFS) is dated December 2020, it is a report which is published by the end of December each year, outlining both the agreed spend of infrastructure income (CIL and S106) from the previous financial year and also the areas that Stroud District

Council will be prioritising for future spending. The Infrastructure Funding Statement will cover both CIL and Section 106 planning contributions. The information within the document relates to all new activity in the year as well as unspent money from previous years. The IFS refers to the draft IDP (2020) setting out the expected infrastructure requirements to support these future growth proposals.

However, as referred to above this is not explicit for all areas of infrastructure. Consequently, the June 2021 version of the IDP does not satisfy the requirements of the PPG above and therefore undermines the deliverability and therefore the soundness of the Plan.

#### **IDP – transport issues**

In respect of Highways and Public Transport the IDP June 2021 page 27 (no paragraph numbers) states:

***“The proposed allocations at PS34 Sharpness Docks and PS36 New settlement at Sharpness have an issue of relative remoteness, particularly in public transport terms. This increases demand for private car usage.”***

The IDP confirms that a total of eight ‘pinch-points’ have been identified in the transport model within the Berkeley Cluster, although nine locations are included in the list consistent. M5 Junction 14 is also separately identified. This is consistent with the highway mitigation identified in the Traffic Forecasting Report, March 2021 as set out above.

It should be noted that in respect of the A38, the IDP page 28 states that further consideration will be required to address potential link capacities on the A38 and the mitigation at the A38 / Alkington Lane junction would require land acquisition either side of Alkington Lane.

The IDP June 2021 page 28 (no paragraph numbers) states:

***“Concerns are raised in the draft LTP that the B4066 and Alkington Lane which link the above site allocations to the A38 Bristol Road are not sufficient to support the levels of growth set out in the Local Plan Review. Corridor improvements remain a short-term priority on the B4066 in the Local Transport Plan.”***

The IDP June 2021 page 29 states:

***“Although in South Gloucestershire, the transport model has indicated that the new settlement at Sharpness Garden Village may result in capacity issues relating to Junction 14 of the M5 and the B4509 which links the motorway to the A38.***

***A joint working group has been established with South Gloucestershire Council, Stroud District Council and a number of developers with the aim of delivering a comprehensive scheme and avoiding a piecemeal approach to development and infrastructure delivery.***

***Highway mitigation in the form of a new junction at Junction 14 has been tested as part of the transport model. A scheme to widen the A38 and the approach from the B4509 are also included within the highway mitigation. It is expected that development within the vicinity of the junction would provide financial contributions towards addressing capacity issues in this location.”***

Again no delivery plan or costings have been published consequently it is not clear how this relates to the housing trajectory on page 306 of the Reg 19 Plan.

It is noted that Gloucestershire County Council Highways have raised concerns about Sharpness and have ***“highlighted the reliance on the PS36 New settlement at Sharpness providing a high level of trip internalisation. It is therefore vital that supporting infrastructure, such as shops and services, are provided in a timely fashion to minimise out-commuting and reduce pressure on the surrounding highway network.”***

However, in order to ensure internalisation is maximised the supporting infrastructure needs to be provided early in the development before other travel patterns become established, there is no programme for this provision and these issues need to be considered in terms of the viability of the proposed new community. This further undermines the soundness of this location being included in the Reg 19 Plan.

It is noted that page 31 of the IDP states that ***“Sustainable transport measures should be implemented as early as possible in development proposals to ensure residents have suitable travel options for walking, cycling and public transport.”*** It is not clear how this could be achieved in respect of the proposed allocation at Sharpness PS36.

#### **Other infrastructure**

The IDP not only covers transport infrastructure, but other important infrastructure related to the delivery of the proposals in the Plan. Page 150 refers to the provision of electricity in the Berkeley cluster which includes the new communities of Wisloe and Sharpness. Whilst Wisloe will be supplied from the Dursley primary substation which currently has sufficient headroom, Sharpness will be supplied by Berkeley primary substation which would supply (Sharpness, Sharpness Docks, Berkeley and Newtown and Sharpness), (and Brimscombe & Thrupp 0.3MVA) and does not have sufficient capacity - there is a shortfall of 1.1MVA at this substation for all of these developments. This shortfall is equivalent to approximately 500 homes or 6ha of employment land use.

The IDP states on page 150 ***“It is likely that Sharpness Docks, Berkeley, Newtown & Sharpness and the initial Sharpness plots will be able to be supported by the remaining available capacity Berkeley primary substation. Based on the provided housing trajectory, it is likely that upgrades will be required by 2037 to support the later plots at Sharpness.”*** It is assumed that this will be required in the plan period i.e. by 2040 to support the development envisaged with the plan period, although it is not specifically referred to in Policy PS36.

However, this does not correspond to the housing trajectory on page 306 of the Reg 19 Plan, by 2035, 1,250 dwellings are expected to be have been completed at Sharpness ( i.e. over half the development which is envisaged in the plan period) and 700 dwellings at Sharpness Docks.

Apparently ***“there are no reinforcements currently planned for Berkeley primary, WPD noted that these would be considered in more detail in the future, once the demand nears the capacity of the substation”***.

Consequently, it is not clear whether there is sufficient provision to support the proposed growth of a new community at Sharpness.

It is noted that Wessex Water forecast that no capacity improvements to Sharpness Sewage Treatment Works were required before 2020, however improvements to increase the sewer network would be necessary to support the proposed developments, but again the IDP is not clear when this will be undertaken.



Page 158 of the IDP refers to the Wessex Water Business Plan (2020-25) but there are no improvements planned for Sharpness STW.

***“An appraisal is required to better understand the potential impact that the new settlement at Sharpness (PS36) will have on the STW, as proposed growth triples the existing flows. Capacity improvements may not be possible within its existing environmental constraints, so the developer should contact Wessex Water for this assessment. Wessex Water also notes that the site is adjacent to the STW and so the impact of odour and flies on the development should be assessed. Severn Trent noted that due to the size of the proposed site at Wisloe, it is important for them to be kept updated with any progression in design, changes to land use/units or its withdrawal, in order to appropriately account for growth in the region. It would be classed as a high-risk site if it were to connect to the Cambridge catchment to the north.*”**

Wessex Water also noted that capacity improvements at Sharpness STW, sufficient to accommodate the proposed developments may not be possible within their existing environmental constraints.

There are no Environment Agency sponsored schemes proposed within its current 6-year FCERM (Flood and Coastal Erosion Risk Management) Capital Investment Programme that relate to any of the sites highlighted within Stroud District.

It is clear from the IDP that there are several areas of infrastructure which raise significant concerns about delivery of the proposed development and also the timing and availability of infrastructure which may well affect the viability of the proposed development. These do not appear to be addressed in the policy.

This was an issue which led to the new garden communities in Essex Local Plans being removed from the Local Plans, albeit they were significantly larger new communities, the Inspector concluded that the new communities should be removed from the Plan because they were not viable and it could not be demonstrated that supporting infrastructure could be delivered.

## **7. Flood Risk**

The area adjacent to the River Severn are shown as Flood Zones 2 and 3; flood defences provide protection to part of the site for the 1:100 annual exceedance probability event.

Because of climate change effects, the standard of protection afforded by the flood defences will be reduced over time. To ensure that the development is protected for its lifetime improvements to the flood defences will be required.

The main accesses to the site will be from the B4006 that is currently subject to flooding. Safe access and egress will be required for the 1:100 plus climate change fluvial and rainfall events. To achieve this access routes will need to be raised above the flood level.

The River Severn forms the western boundary of the southern parcel, with the Little Avon forming the boundary to the south of the site. A large part of the site is within Flood Zones 2 & 3; the site was subject to fluvial flooding in 2012 from the Little Avon.

Over a third of the site is considered to be at risk of a 1 in 100-year flood event from tidal/fluvial flooding from the River Severn and around a quarter of the site is considered to be at risk of a 1 in 100-year flood event from Little Avon. The extent of the flooding will increase over the lifetime of

the development because of climate change and the predicted increase in sea/tidal levels and fluvial flows, and the increase in rainfall intensity.

The southern part of the site benefits from flood defences in the form of a coastal embankment, which provides a protection from a 1 in 100-year flood. The northern part of the site is not covered by this embankment and there remains a risk across the site from the Little Avon. The effectiveness of the defences will decrease over time because of climate change; improvements to the defences will be required to provide protection for the lifetime of the development.

The Environment Agency is actively considering changes to the Shoreline Management Plan that would affect the site. Details, funding, and timescales are not identified in the IDP.

## **8. Economic strategy**

The Gloucestershire Strategic Economic Plan (SEP) update 2018 continues to focus on the M5 around junctions 9, 10, 11 and 13. Page 21 of the SEP states:

***“The Growth Zone seeks to identify and secure the availability of quality employment land in proximity to the M5 motorway corridor that is attractive to businesses and has excellent connectivity throughout Gloucestershire and to the rest of the UK. The importance of the M5 in this context remains as significant now as it was in the original SEP.”***

Within this context it is not clear what the demand is for businesses to locate at Sharpness. To some extent proposing significant development which is not consistent with the current SEP is a high risk strategy and pre-judges further work, in particular the Industrial Strategy and other aspects of the evidence base such as the Landscape Sensitivity Assessment.

In our previous representations in response to the Reg 18 consultation in we have stated that in terms of Sharpness the area has a long history, a site in the adopted Local Plan 2015 was allocated for 300 dwellings (Policy SA5) and also included 7 hectares of employment land for expansion, but has yet to come forward for development (an outline application was submitted in April 2017, S.17/0798/OUT but according to the Council website is awaiting decision).

The Draft Gloucestershire Local Industrial Strategy September 2019 aims to ***“build on recent success to drive inclusive growth and secure an economy fit for the future, which benefits everyone who lives and works in the county.”***

The draft strategy identifies Gloucestershire’s strengths, opportunities and challenges. It also aligns with the Government’s National Industrial Strategy, which focuses on five ‘Foundations’ for productivity, and four ‘Grand challenges’. The Industrial Strategy looks to focus ***“around the “Growth Zone” which runs through the county adjacent to the M5 and will deliver thousands of new homes and commercial land to generate economic growth for the county”***.

***“These proposals have highlighted the potential for a Central Gloucestershire City Region – a vibrant central Gloucestershire area that builds on the two urban centres, working together to provide the transport infrastructure and housing needed by those people we want to attract and retain in the county.”*** GFIRST LEP DRAFT LOCAL INDUSTRIAL STRATEGY Page 80 (2019)

The Draft Industrial Strategy page 33 refers to:

***“Gloucestershire’s future garden towns and villages will put green energy and green construction at the heart of their design.***

***These developments have been identified in:***

- ***Tewkesbury at the Tewkesbury Garden Town;***
- ***Cheltenham at the Cheltenham Garden Village; and***
- ***Stroud district at the Sharpness Eco Village.”***

Interestingly, whilst the anticipated contribution from Tewkesbury Garden Town, in the M5 Growth Zone, is mentioned i.e. it *“will provide opportunities for new developments and productive businesses. It promises to deliver £74m in GVA and 3,300 jobs with no taxpayer expense.”* ; there is no mention of the expected contribution from the Sharpness eco village.

In fact Sharpness is only mentioned three times in the whole document, in relation to cycle links (page 69), and in respect of the new communities (page 70)

Furthermore, it is not clear how the Sharpness eco village will deliver, when the focus in the Draft Industrial Strategy is on developing ***“a vibrant business and education offer at Berkeley Science and Technology Park, as a hub for future low-carbon technology innovators”*** which is intended to ***“work in tandem with a proposed future Eco-Park at junction 13 of the M5, creating a vibrant hub for green technology and skills in Stroud district”***. Page 38 GFIRST LEP DRAFT LOCAL INDUSTRIAL STRATEGY. However, it should be noted that the Employment Land Review (March 2021) at paragraph 5.5 states that: ***“Premises are affordable although older so are unlikely to attract major employers who want top quality accommodation. Also, there is a limit on HGV movements through Berkeley Village which means GSTP is unlikely to attract larger B2/B8 firms.”***

The Employment Land Review (March 2021, the (ELR) takes the employment land requirements set out in the Gloucestershire Economic Needs Assessment (ENA) and identifies a supply of suitable land to meet the needs of the District over 2020-2040. The Executive summary states at xxi)

***“Questions of deliverability remain over the Knowledge Park proposal at the Sharpness New Settlement and to a lesser degree at PS37: New settlement at Wisloe. However, these issues do not mean that no employment land can be brought forward in these schemes.”***

It is noted that paragraph xxi) acknowledges the benefits of employment land at Grove End Farm as part of a mixed use proposal. ***“Employment land in the Land north of Grove End Farm mixed-use proposal seems a stronger prospect. Located at Junction 13, M5 and linking to the Stonehouse employment cluster. The land is also under the control of an active local commercial developer.”***

Furthermore the recommendations of the report question the deliverability of PS36 new settlement at Sharpness and also the deliverability of the new settlement at Wisloe, indicating that further information is required.

The ELR paragraph 5.7 and Section 7 reports the concerns that GFirst have in respect of any business park for knowledge-based businesses at the eco Settlement/new Settlement at Sharpness:

***“GFirst feel this will be hard to deliver in practice for several reasons:***

- ***The high-grade premises required will be expensive and hard to deliver viably***
- ***Will need an experienced developer partner, also partners willing to accept long term management responsibility to attract occupiers and maintain to a high standard***

**• Given the isolated position of the site it was felt that this would not work unless the ‘Knowledge Park’ can attract an anchor tenant who will bring in others.”**

The ELR goes on to state that “...it is felt there will be strong pressure for the development partners to avoid a high risk specialised business park development and just deliver basic B2/B8 units here.”

The above demonstrates how sceptical GFirst are about the deliverability of employment at this location, this undermines the proposed new settlement. If only B2/B8 employment is provided then the number of jobs will be less than a business park and therefore increasing the propensity for out commuting as residents seek employment elsewhere.

At paragraph 5.15 South Gloucestershire and Stroud College (SGS Commercial Services) also questions whether a ‘Knowledge Park’ can be supported here **“as most technology requirements can be accommodated at GSTP, now and for approx. the next decade. Commercial development at Sharpness New Settlement could be focused on small trade counter uses instead or considered a long term, 10-20 year development, when GSTP is full and local companies need grow-on space. In the more immediate future the ‘Eco Park’ proposal by Ecotricity at Junction 13, M5 is viewed as a viable source of expansion space for GSTP companies. SGS are therefore in support of this proposed development”**. It is noted that the ELR reports that the proposal for a knowledge based business park has not been marketed yet.

Table 35 provides a summary of the Employment Site Assessment (page 149) and concludes that the Knowledge based business park is an ambitious proposal. Most of the demand is currently being met by GSTP, Berkeley, the College intends expand GSTP into the area begin decommissioned, this will meet demand for the next decade, to meet larger requirements in the short term the College is looking to the Eco Park proposal of Junction 13 (Policy PS20) and only in the longer term is development at the Knowledge Based Park considered. This raises questions about the ability of PS36 new community at Sharpness to meet the Priority Objectives of the Plan i.e. ensuring new development is located in the right place, supported by the right services and infrastructure to create sustainable development - in particular **“concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth.”** (page 11 of the Reg 19 Plan); and clause 25 of Policy PS36 which states that: **“Phasing arrangements to ensure that employment land is developed and occupied in parallel with housing land completions and retail and community provision is made in a timely manner.”** (my emphasis)

Table 35 also identifies practical barriers to delivery of the site:

**• “Delivery/Management – A Knowledge Based business park would require a specialist developer to deliver, to market and to manage premises over the long term to maintain high standards. No such partner has been secured or is understood to have shown an interest at this time.”**

**• Anchor Occupier – The two other specialist business park schemes proposed in the District, the Eco Park (Junction 13, M5) and the expansion of Renishaw New Mills, both have anchor occupiers secured, Ecotricity and the Renishaw linked company. These businesses will take up a high proportion of the space, ensure development occurs and attract other occupiers from their supply chains/customer base to the sites. At Quedgeley and Stonehouse development will build on an extensive critical mass of existing businesses. However, no equivalent anchor exists at Sharpness”**

**and existing companies at Sharpness Dock are unrelated to those which might be accommodated at the Knowledge Park” (my emphasis)**

All of the above undermines the deliverability of the new settlement at Sharpness and this is found in the Council’s own evidence base, it raises questions about the site selection and the viability of the proposal at Sharpness.

It should be noted how positive the ELR is towards land at Grove End Farm, Whitminster (which we are promoting as an alternative site to Sharpness) in a far more accessible and sustainable location and attractive to the market. The Executive Summary of the ELR recommends that the Council consider allocating Grove End Farm as part of employment land supply. The report considered the site (in Table 29 as Employment land for up to 52,000 sqm within mixed-use development including 2,250 dwellings), this is a far more sustainable location and accessible from the movement corridor and enabling public transport to be supported.

Table 35 of the ELR provides a summary of the employment sites assessment. Page 158 concludes for Grove End Farm, Whitminster that:

**“Although only a Local Plan/SALA Call for Sites submission at this stage, with no detailed masterplanning or agreements amongst the landowners about the nature of delivery, *this location does have some advantages over the other New Settlement proposals, at least in terms of employment land deliverability. These include the fact that the land is under the control of an experienced developer who is already active in the area, marketing E/B-Class plots at West of Stonehouse, thus knows the local market and business requirements.***

**The employment land is in a very strong location off Junction 13, M5 allowing it to tap into the two core markets of the District – larger sub-regional/regional requirements on the M5 Corridor and large business growth in Stroud/Stonehouse. The linear nature of the proposed employment site would prevent development of the very largest B2/B8 units here, but it could still provide some 52,000 sqm of space at standard developer ratios.**

**The site would also benefit from proximity to the Eco Park proposal, which would build up a critical mass of businesses at Junction 13. There could be some competition between the two sites, however, the Eco Park will focus on accommodating businesses with specialisms in green technology. There is no assumption the Land north of Grove End Farm will have a similar, overlapping focus.” (my emphasis).**

The above clearly demonstrates the suitability credentials of land at Grove End Farm, Whitminster as a sustainable and deliverable location. **This is further endorsed by paragraph 7.15 of the ELR** which considers the three new settlement options (only the employment element of Grove End Farm, Whitminster has been considered),

- **“this would seem to be the strongest of the options. Land here is optioned to a commercial developer who is already active locally, marketing/developing E/BClass plots at SA2: West of Stonehouse, so has existing knowledge of local market conditions. Positioned at Junction 13, M5 it can tap into both the M5 Corridor market and demand for Stonehouse, a centre for both B2/B8 business expansion in the Stonehouse/Stroud Valleys area and for larger E1(g) (i) offices. It would be well placed to meet longer term growth needs if employment land around Great Oldbury is taken up relatively early in the Plan period. Assuming the Eco Park proposal was brought forward, critical mass around Junction 13**

***would further increase, with the area becoming a centre for advanced manufacturing in Stroud District”***

Whereas

- ***“PS36 New Settlement at Sharpness - Sharpness is far from isolated from Gloucestershire and Bristol markets, and the proposal for a Knowledge Based business park would benefit from a proximity to GSTP which lacks options to meet the needs of larger technology businesses, both firms expanding from its accommodation and inward investors, particularly manufacturing/logistics firms. In the short-mid term, the Eco Park Proposal, if realised, could meet a lot of this need. In the longer term, some 10-15 years, a Knowledge Based business park at Sharpness could be well placed to support further growth. 10-15 years is perhaps a realistic timeframe for the delivery of an employment scheme within the complex Sharpness New Settlement. However, to deliver such a Knowledge Based business park, the Sharpness scheme will need to secure the buy in of a developer/manager willing to retain a longer term interest. Ideally, it would also need the support of anchor occupier willing to take space and draw other occupiers to the area, as seen in the Eco Park/New Mills proposals. If the Knowledge Based business park proposal does not prove deliverable the most likely alternative to the Knowledge Park would be a traditional development of E/B2/B8 industrial and warehousing, building on the established cluster of the Docks/Severn Distribution Park, reflecting local demand while also meeting the needs of the new households.”***
- ***“PS37: New settlement at Wisloe – At the time of writing, proposals at Wisloe for employment land appear to be less well developed than the wider housing-led scheme. No commercial development partners have been secured for the scheme, or are understood to have shown interest, or formal agreements signed as to the scale and nature of development or how the costs and values of the E/BClass uses, which will generate less capital value than the housing, will be apportioned between the landowners. Without greater clarity on these elements it is difficult to be confident about the ultimate deliverability of the employment element.”***

Of the new settlement locations considered in the ELR, the report concludes Land north of Grove End Farm appears most deliverable. For the new community at Sharpness, PS36 there is limited evidence of how, and by whom delivery would be achieved and similarly for the new settlement at Wisloe, PS37, much more planning is required as to how, by whom and to what timescale the E/B-Class element would be developed before it is possible to be confident of delivery here.

#### Overall Conclusions

As set out in our previous representations to the emerging Strategy and our representations to the Reg 18 Plan, Pegasus object to further development over and above the current local plan allocation at Sharpness . It is considered that irrespective of whether a new community at Sharpness is viable, its delivery is going to be inferior to sites better located to centres of population, such as Grove End Farm, Whitminster. Consequently reliance on PS36 places a high risk on delivery.

All of the evidence that has been referred to above does not support the proposed new community at Sharpness, furthermore independent research such as the updated Lichfield’s Report “Start to Finish” February 2020 also confirms that the assumptions on delivery cannot be supported. The proposed new garden village at Sharpness will not achieve and deliver the number of dwellings

anticipated in the plan period. Consequently, the proposed allocation of a new community at Sharpness is not justified and cannot be considered to be effective over the plan period, its inclusion in the Plan renders the Plan unsound (para 35 of the NPPF 2019). Policy PS36 should be removed from the plan.

The section below in response to question 6 sets out the modifications we consider necessary in order to make the Plan sound.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy PS36 should be deleted for the reasons set out above.

As a replacement site, Land at Grove End Farm, Whitminster should be included in the Plan. It has the capacity to accommodate 2,250 dwellings and employment land in a highly sustainable location which is also attractive to the market. It is considered that land at Grove End Farm, Whitminster, which is at the confluence of the A38/M5 and A419 corridors, well related to Stroud/Stonehouse, Cam/Dursley and also Gloucester, provides the opportunity to achieve a mixed use development in a highly sustainable location (being well connected to public transport). Figure 1 from the Sustainable Transport Strategy demonstrates the location of Whitminster at the hub of the identified movement corridors in the STS, where integrated packages of initiatives can be delivered, which can “showcase multimodal use with a focus on sustainable travel modes”. The Site at Whitminster is well placed to support this approach being located at the central ‘Hub’ of the ‘Movement Corridors’. Development of the Site will enable people to access services and facilities elsewhere along the movement corridors. The location is where there is the best chance to obtain improvements to community infrastructure, services and facilities and bring about coordinated improvements to accessibility, connectivity and public transport as a direct result of development. The Site is in relatively close proximity to the main settlements of Stroud, Stonehouse and Cam/Dursley which will provide residents with a choice of sustainable travel modes to connect to the key centres in the District with ease.

Land at Grove End Farm has been subject to consultation and was included in the Council’s Additional Housing Options consultation in December 2020 (reference WHI014 and has also been assessed in the SA).

A Position Statement was prepared by Pegasus to support the consultation, this is attached as an Appendix to this representation.

All the required studies have been undertaken to support the preparation of the planning application for land at Grove End Farm, Whitminster.

Development at Grove End Farm, Whitminster would be consistent with the SEP Growth Zone, ensuring the availability of quality employment land in proximity to the M5 motorway and enabling excellent connectivity throughout Gloucestershire and the rest of the UK. The location has been

endorsed by the ELR as referred to above as the most deliverable of the three new settlement locations.

Grove End Farm has been subject to SA by the Council (LUC report May 2021 pages 559 WHI007 and page 655 WHIT011, assessment WHIT014/PGP1 assesses the (combined site WHI007 & WHI011) (2,250 dwellings, 18ha employment land, local centre, primary school and sports pitches) page 658.

The SA concludes at page 954:

***“Having considered the results of public consultation, assessment work and local evidence, the Council has decided not to take this growth point forward into the Pre-submission Draft Local Plan. The site performs less well than alternative sites in terms of meeting sustainability appraisal objectives and compatibility with the proposed development strategy.”***

Pegasus strongly object to this conclusion, for many reasons as outlined above. It is inconceivable that this conclusion has been reached on the basis of the evidence. Land at Grove End Farm, Whitminster is a far superior sustainable location which can deliver a comprehensive mixed use development which links with and complements the existing settlement pattern and provides for housing, employment, social and recreational needs with access to extensive green infrastructure. The Site is located on the Main Movement Corridor as defined in the Stroud Sustainable Transport Strategy.

Locating development on existing or potential high-quality public transport corridors represents some of the most sustainable options for any development strategy. Opportunities to build on these corridors by increasing service frequency and reliability will ensure public transport is highly competitive with car use. Stagecoach supports the delivery of development alongside the A38 corridor at Whitminster as it would help to catalyse the necessary step change in bus service provision needed to help meet the Council’s wider sustainability goals, including carbon neutrality. The project team has liaised directly with Stagecoach in order to obtain input from the Company to inform the access strategy to serve the site and ensure that its aspirations for public transport in the area are considered from an early stage.

If the scoring of Grove End Farm, Whitminster is compared with PS36 Sharpness it is evident that there are many anomalies.

We have provided as part of the appendices to the representations on PS36, a critique of the SA for Sharpness and compared the site with land at Grove End Farm, Whitminster.

### **SA7 Biodiversity/geodiversity**

With regard to the SA it is not clear how a minor negative (and uncertain) effect on biodiversity was reached. The Grove End Farm site is able to contribute in financial terms to the current Severn Estuary avoidance strategy and would not represent supporting habitat/functionally-linked land to qualifying bird species from the Estuary (as evident from surveys completed). In addition, the site has the ability to provide on-site public open space that would attract new residents (and existing local residents) and discourage regular visits to the estuary, i.e. provide everyday (dog)walking needs. Whilst there is proximity to a Key Wildlife Site (River Frome Mainstream and tributaries KWS) this is separated from the site by main A-roads and no significant effects are anticipated assuming standard engineering practices are implemented to prevent indirect effects from run-off etc. There is a full baseline of ecology surveys to inform the design of the development and so it is unclear how the SA identifies effects as uncertain (albeit only minor). Either way, in biodiversity terms it is



considered that the significant uncertain negative effects (albeit mixed with positive effects in the eyes of the authors) on the Sharpness allocation would be less preferable to the likely effects arising from the Grove End scheme particular with regard to the Severn Estuary.

The overriding point is the lack of baseline information and uncertainty associated with the Sharpness PS36 allocation which would be contrary to the requirements of the Habitats Regulations.

### **Transport**

In respect of Transport, according to Table A4.1: 'Assumptions for the appraisal of residential site options', Objective SA10 'To ensure that air quality continues to improve' has been assigned a 'score' based on the SALA Transport Accessibility Assessment undertaken by Gloucestershire County Council on behalf of Stroud District Council (SDC). The SA states that this work rated each site option in terms of its accessibility to town/district/local centres, employment sites and services and facilities that people may be required to access on a regular basis. The full details of how the score for each site was determined are not set out in the Sustainability Appraisal Report. I set out our initial observations below:

As set out in Appendix 7 'Detailed SA Matrices for site allocations in the Draft Plan and the Pre-submission Draft Local Plan', the score for PS36: Sharpness new settlement in respect of SA10 at the Equivalent Site Option stage was double negative (Significant negative effect likely), reflecting its relatively remote location. The score was upgraded to double positive/double negative (Mixed significant effects likely) at the Draft Local Plan stage and upgraded again to double positive/single negative (Mixed significant positive and minor negative effects likely) at the Pre-Submission Draft Local Plan stage.

The justification for the upgrading to the score for PS36: Sharpness new settlement in respect of SA10 states:

***"Site Allocation policy text included in the Draft Plan required the site to be developed to allow for a new rail station and rapid bus services. The site was to be delivered to prioritise walking, cycling, and public transport over the use of private car in line with this draft policy. Furthermore, the provision of new services and facilities at the site in line with the Garden Village Principles could help to reduce the need for residents to travel from the area on a regular basis. In line with Strategic Site Allocation Policy PS36 in the Pre-submission Draft Plan, the site is expected to be developed to support sustainable transport measures, reduce car ownership and car usage, improve public transport permeability and enhance bus connections to key destinations including Bristol and Gloucester, as well as a new railway station and enhancements to the Sharpness branch line."***

As set out elsewhere in our representations, Sharpness is in a remote location some significant distance from the main movement corridors and major centres of employment. A new rail service is extremely unlikely and cannot be guaranteed and the commercial case to provide a relevant bus or coach-based public transport service is in question. In contrast to the remoteness of Sharpness, the omission site of Grove End Farm, Whitminster, is located at the hub of main movement corridors as identified in the STS, where improvements to facilitate travel by alternative more sustainable modes of transport would be much more readily achieved, and is favourably located in relation to employment destinations including Stonehouse, Stroud and Gloucester.

As set out in Appendix 5 'Summary of effects for and detailed SA matrices for all of the site options considered to date' the score for WHI014/PGP1: Land at Grove End Farm in respect of SA10 is a single negative (Minor negative effect likely), which is a more favourable 'baseline' score than PS36: Sharpness new settlement as would be expected.

Land at Grove End Farm, Whitminster should replace the proposed new community at Sharpness.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Our objections go the heart of the Plan and its strategy as we consider the Plan as drafted with the inclusion of a new settlement at Sharpness is unsound.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:

20.07.2021