



Stroud District Local Plan Review

Summary of Responses to Additional Technical Evidence Consultation

APPENDIX B: EB108 Sustainable Transport Strategy Addendum

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EB108 Sustainable Transport Strategy Addendum

Stakeholders	Summarised comments	Stroud District Council Response
McLoughlin Planning (70)	<ul style="list-style-type: none"> The document is focused on providing an update of the original STS of 2019 and in light of submissions already made, contains the same flaw in that it solely focuses on strategic allocations in the Plan, ignoring the Strategy implications of other smaller housing allocations made in the Plan. 	<p>The STS does not solely apply to larger strategic allocations, and whilst some of these are highlighted within the document, the STS also considers mode and corridor-based interventions required to achieve mode shift from single occupancy vehicles across the District.</p> <p>All future development within Stroud, including smaller site allocations, will be required to promote transport choice and accessibility in accordance with Delivery Policy E112 of the Stroud Local Plan Review.</p>
	<ul style="list-style-type: none"> The STS update is a missed opportunity to provide a better focused document. For example, paragraph 3.6 of EB108 requires bus stops to be provided in new development. In the case of allocation PS44, this is simply not possible as the site is not directly situated on a bus route. Therefore, how can the allocation meet this objective? 	<p>SDC note that allocation PS44 is located adjacent to bus stops on Whitminster Lane, Frampton on Severn and as such any future development would be required to consider enhancements to bus stops and or services in relation to the site. Paragraph 3.6 specifically references that the new bus stops and shelters should be at “appropriate locations”, and does not state that bus stops should be in new development.</p>
	<ul style="list-style-type: none"> The final point is that in seeking to deliver allocation PS44 and the additional numbers sought, the STS update provides no data on the transport infrastructure improvements which will be required. It would be of great assistance to SevenHomes that the infrastructure improvements required were specifically highlighted in the STS update so that requirements could be fully understood. 	<p>The STS is a strategy which sets out strategic measures. As is the normal process, a full list of infrastructure improvements required would be agreed through a planning application, in line with the policy requirements set out in the plan, and with the benefit of a detailed Transport Assessment provided by the Applicant.</p> <p>Infrastructure requirements for strategic allocations have been provided for key locations where particular consideration for sustainable transport is required. The STS also considers mode and corridor-based interventions required to achieve mode shift from single occupancy vehicles across the District which should be considered by other development in relation to site-specific sustainable transport strategies.</p>



		All future development within Stroud will be required to promote transport choice and accessibility in accordance with Delivery Policy E112 of the Stroud Local Plan Review.
Brookthorpe-with-Whaddon Parish Council (68)	<ul style="list-style-type: none"> To place the hub furthest away from the main entrance to the G2 site is wrong. The original option to site the hub next to Whaddon Garage had no visibility issues, has sufficient land without any constraints, and is the middle point of the A4173 frontage. In addition to creating a new entrance where there are safety issues, the location is furthest way from the areas where most traffic movements can be captured and from the housing which it is intended to serve. Like Kingsway Park & Ride, the obvious place to place a hub is by the main entrance from the highway rather than in the Buffer Zone on a sensitive site obstructed by other offsite buildings and with visibility issues. The siting of the hub should be returned to its original location behind Whaddon Garage. 	The STS does not provide specific location of the multi-modal transport hub within the site masterplan, but states that this should be adjacent to the A4173 to maximise potential mode shift on the existing corridor.
	<ul style="list-style-type: none"> Even if the hub were sited at Church Field the STS at Table 5-1 page 26 states that a hub would provide a reduction of just 10% of background traffic meaning that it would not achieve any significant impact on traffic usage on the A4173. 	See comment above. The level of reduction in background traffic has been discussed and agreed collaboratively with GCC.
South Gloucestershire Council (71)	<ul style="list-style-type: none"> South Gloucestershire Council has raised concerns regarding the technical evidence published for consultation on 27th September and which SDC seek to rely on to justify the reasonable prospect that the funding and delivery of their Local Plan spatial strategy can be achieved in a sustainable way. South Gloucestershire Council has put forward recommendations to resolve these matters and would welcome continuing to work with Stroud 	SDC will continue to work with SGC through a Statement of Common Ground to address issues raised.



	District Council to resolve these matters through agreeing appropriate modifications which can be secured through a SoCG ahead of examination in public commencing. Subject to this, the matters remain unresolved and points of objection at the current time.	
Pegasus group on behalf of Robert Hitchins - PS19a/PS36 (73)	<ul style="list-style-type: none"> PS19a NW Stonehouse is aligned with the Sustainable Transport Strategy (STS) Addendum in that it can offer a realistic choice of sustainable transport modes, limiting the need to travel by car by maximising accessibility to low-carbon modes of transport, with walking, cycling and public transport prioritised. This will help towards achieving SDC's target of carbon neutrality by 2030. 	Comments noted.
	<ul style="list-style-type: none"> The STS Addendum does nothing to change our conclusions from our previous representations that the PS36 Sharpness allocation is in an unsustainable location some significant distance from the main movement corridors and major centres of employment. It does not offer a realistic choice of sustainable transport modes; the proposed new rail service cannot be guaranteed and the commercial case to provide a relevant bus or coach-based public transport service is in question. Consequently, development here will encourage travel by car which will have a significantly negative impact on air quality, and do little to improve traffic congestion. 	<p>SDC disagrees with this assessment of accessibility for site allocation PS36. The site scores well in the SALA accessibility assessment in terms of proximity and access to existing services and facilities. The size of the development will enable significant investment / delivery of sustainable transport infrastructure which otherwise would be less certain compared to a number of smaller sites. The size of the development also unlocks public transport viability, and material levels of internal trips within the development, reducing the need for travel on the existing highway network.</p> <p>It is acknowledged that the reopening of the railway line to Sharpness has challenges in terms of delivery, however allocation PS36 is not dependent on this to provide suitable sustainable travel measures. The STS and the SLP policy recognises this uncertainty and requires significant commitment to road based sustainable public transport to meet longer distance sustainable travel requirements, to manage this risk, both in the short term and if the reopening of the line does not materialise in the long term.</p>



<p>Stonehouse Town Council (75)</p>	<ul style="list-style-type: none"> The town council strongly supports the 2030 Climate Strategy and changes to the sustainable Transport strategy, in particular the active travel corridors from northwest of Stonehouse to Stonehouse and Maidenhill school. The town council wishes to also stress the importance of the reopening of Bristol road station. However, council feels the highway mitigations are not compatible with either of these strategies. 	<p>SDC is promoting the re-opening of the Bristol Road Station.</p> <p>The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the site, especially in terms of a ‘decide and provide’ approach to sustainable transport.</p>
<p>Wisloe Action Group (WAG) (32,63)</p>	<ul style="list-style-type: none"> The amended consultation documents do not address any of the concerns raised in the previous objection. Indeed, they compound the concerns raised previously as they assume an even greater trip transfer to sustainable modes without any justification other than a “greater level of ambition”. The levels of housing included within the DLP have increased considerably and will inevitably generate more traffic in the vicinity of PS37 Wisloe than was considered previously yet no additional mitigation is proposed. The “greater level of ambition” for transfer to sustainable modes conveniently offsets any additional traffic although there can be no guarantee that the ‘ambition’ will be realised in part or in total. No evidence has been provided to support a strategy which assumes high quality pedestrian, cycle and public transport infrastructure can be provided for the Wisloe site and the new higher assumed percentage reduction in vehicle trips (50% increase) is predicated on just such a provision. 	<p>The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. The assessment has been undertaken on the basis of best practice and industry-standard guidance.</p> <p>The STS and STS Addendum justifies why the proposed level of mode switch from car-based travel to sustainable transport can be made. The mode shift is enabled by specific sustainable transport initiatives and / or infrastructure proposals.</p> <p>The mode shifts presented have been agreed with the relevant Highway Authorities, including GCC and National Highways and between the representing transport planning professionals. The STS Addendum outlines more robust mode share following acknowledgement from the Highway Authorities that more ambitious targets are likely to be achievable. The Highway Authorities have been keen throughout discussion on the STS not to promote overly-ambitious mode shift and as such the values presented in the STS Addendum are considered to be practicable and realistic. Furthermore, the TFR includes scenarios without the STS mitigations.</p>
	<ul style="list-style-type: none"> Previous experience shows developers have a poor record delivering infrastructure projects which are 	<p>The provision of pedestrian / cycle connections to Cam and Dursley railway station and contributions to public transport measures are key</p>



	<p>invariably late (houses first). To even be considered viable the proposed M5 bike/footbridge must be mandated, no choice. Similarly, the proposed public transport improvements must be mandated and not left open to 'market forces' which most likely would ultimately result in a return to personal car travel.</p>	<p>requirement of this site, as outlined in the STS and STS addendum. This is established through Local Plan Policy and planning applications will need to come forwards in accordance with the made Development Plan. The timing of delivery of mitigation measures will be determined through the planning application process.</p>
<p>Stagecoach West (20)</p>	<ul style="list-style-type: none"> Rapidly intensifying national and local policy emphasis on the need for mode shift to active travel and public transport, justifies high but apparently arbitrary increases in target mode shift from car use. However, additional STS proposals to achieve it are absent. Indeed, after 3 years, almost no additional evidence is adduced regarding substantive measures to support a mode shift to public transport, including costs thereof. <p>This includes the Sharpness Branch Rail Line. It is unclear if the STS believes this is needed to support PS34 and PS36.</p> <p>Alignment and consistency on proposed non-highway measures across the evidence base is lacking.</p> <p>These deficiencies seriously undermines the rest of the evidence base.</p>	<p>The STS provides commitments to various public transport enhancements, along key corridors and at strategic sites. It sets a strong basis for site specific measures to be secured at the time of future planning applications.</p> <p>The mode shifts presented have been agreed with the relevant Highway Authorities, including GCC and National Highways and between the representing transport planning professionals. The STS Addendum outlines more robust mode share following acknowledgement from the Highway Authorities that more ambitious targets are likely to be achievable. The Highway Authorities have been keen throughout discussion on the STS not to promote overly-ambitious mode shift and as such the values presented in the STS Addendum are considered to be practicable and realistic. It is recognised that there is limited empirical evidence available as to the level of mode shift that individual schemes can achieve. For that reason, the level of mode shift which is considered feasible has been discussed and agreed with the Transport Working Group. Furthermore, the TFR includes scenarios without the STS mitigations.</p> <p>It is acknowledged that the reopening of the railway line to Sharpness has challenges in terms of delivery, however allocation PS36 is not dependent on this to provide suitable sustainable travel measures. The STS and the SLP policy recognises this uncertainty and requires significant commitment to road based sustainable public transport to meet longer distance sustainable travel requirements, to manage this</p>



	<ul style="list-style-type: none"> • There is no reference to material changes to the baseline bus network and substantial committed improvements to rail services at Cam. • The material is oblivious to the Network Rail Bristol-Birmingham Strategic Rail Study which presents strong evidence of the undeliverability of rail service from Sharpness. 	<p>risk, both in the short term and if the reopening of the line does not materialise in the long term.</p> <p>The capacity of existing rail infrastructure and services at Cam and Dursley railway station is a matter for Network Rail. Consideration for expansion of provision is outside the scope of the SLP process. Possible improvements to service frequency may be available long-term as part of the MetroWest proposals (30min frequency service between Bristol Temple Meads and Gloucester).</p> <p>SDC is fully aware of the Network Rail Bristol-Birmingham Strategic Rail Study and representations from GCC in this regard.</p> <p>It is also acknowledged that the reopening of the railway line to Sharpness has challenges in terms of delivery, however allocation PS36 is not dependent on this to provide suitable sustainable travel measures. The STS and the SLP policy recognises this uncertainty and requires significant commitment to road based sustainable public transport to meet longer distance sustainable travel requirements, to manage this risk, both in the short term and if the reopening of the line does not materialise in the long term.</p>
	<ul style="list-style-type: none"> • On the basis of the additional evidence here and that we highlight, the unsoundness of PS34 Sharpness Docks and PS36 New Settlement at Sharpness on sustainability and accessibility grounds is further reinforced. 	<p>SDC disagrees with this assessment of accessibility for site allocation PS36. The site scores well in the SALA accessibility assessment in terms of proximity and access to existing services and facilities. The size of the development will enable significant investment / delivery of sustainable transport infrastructure which otherwise would be less certain compared to a number of smaller sites. The size of the development also unlocks public transport viability, and material levels of internal trips within the development, reducing the need for travel on the existing highway network.</p>



	<ul style="list-style-type: none"> Stagecoach support for most strategic allocations still stands, reflecting the innate strength of the STS logic within the development strategy and the good relationship of most of the SAs to the SMCs. Our support for G2 Whaddon is now unconditional. 	Comment noted.
Grass Roots Planning Ltd (34) PS36, PS38, PS47	<ul style="list-style-type: none"> Whilst the Transport Strategy Addendum sets laudable goals, our concern is that certain allocations set out within the plan (such as Sharpness) do not reflect those aspirations and will lead to unsustainable patterns of development forming. In comparison, allocating a site such as land north of Charfield Road, Kingswood is considered to be more appropriate. This is because it lies in proximity to a major employment area that is expanding (Renishaw Mills), a key piece of infrastructure (Charfield Railway Station) which is accessible by walking or cycling, and lastly public transport – which the local operator Stagecoach has confirmed there is a viable business case for expanding and providing additional bus services along this route. The site would also contribute to the delivery of the Active Travel Route identified and required between Wotton-under-Edge and Charfield. 	<p>SDC disagrees with this assessment of accessibility for site allocation PS36. The site scores well in the SALA accessibility assessment in terms of proximity and access to existing services and facilities. The size of the development will enable significant investment / delivery of sustainable transport infrastructure which otherwise would be less certain compared to a number of smaller sites. The size of the development also unlocks public transport viability, and material levels of internal trips within the development, reducing the need for travel on the existing highway network.</p> <p>Whilst the potential transport benefits of Land at Charfield Road are acknowledged, this allocation has been discounted on landscape grounds. (The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site. Development would significantly extend the settlement form into the open vale countryside on higher ground and is inappropriate within the wider landscape).</p>
Dursley Town Council (35)	<ul style="list-style-type: none"> Highways mitigation in the form of a widening A38 approach is welcomed (PS24). The Slimbridge roundabout is Dursley's main link to A38 and M5 connections. The capacity of this roundabout to cope with increased traffic is important. 	Comment noted.



	<ul style="list-style-type: none"> There is no mention of the A4135 Cam pitch roundabout being already over capacity and any opportunities to mitigate the problem with increased traffic. 	<p>Mitigation of impacts on the A4135 corridor is achieved via the STS, which indicates provision of sustainable transport measures, including bus priority and improved services, along this corridor to reduce dependence on car use.</p> <p>Additionally, SDC will require the planning application(s) for any SLP site allocations or any other development within the District to consider the mitigation requirements local to the site.</p>
	<ul style="list-style-type: none"> Council strongly opposed proposals to install traffic lights at locations, including: A4135 Draycott, Cam A4135 -over Bristol mainline railway bridge (S.14/2612/DISCON). Proposed lights - Sandpits/Tiltdown/Dursley Road junction (S.15/2804/OUT the Stroud Local Plan Capacity Assessment, public meeting 27/09/16) There is no evidence that traffic lights improve the flow of traffic. Use of traffic lights has resulted in long queues, congestion and delays which has an adverse impact on the environment and emissions. Council campaigned to successfully remove traffic lights at the Castle Street/May Lane junction in favour of the existing mini roundabout, dramatically improving traffic flow. 	<p>SDC note that traffic light improvements have not been suggested as mitigation on any highways in Cam / Dursley area and so it is not clear what Dursley Town Council is objecting to in this comment.</p> <p>SDC does not agree that the installation of signal-control on the network would have an unacceptable adverse impact, however effects of any future proposals would need to be demonstrated as appropriate mitigation for the network as a whole, including in terms of sustainable modes, as part of any future planning application(s).</p> <p>The appropriate form of mitigation will depend on the particular location, and the level and pattern of traffic flows, as well as pedestrian and cycle desire lines and safety needs</p>
	<ul style="list-style-type: none"> Dursley Town Council considers roundabouts to be a suitable, sustainable alternative measure, in terms of traffic flow, maintenance, the environment and air quality, to signalised junctions. 	<p>Comment noted.</p>
Minchinhampton Parish Council (36)	<ul style="list-style-type: none"> The support given to boosting cycle provision for the A419 along the Golden Valley must also have a displacement effect onto roads across the Common. This aspect has been overlooked and require serious consideration. Already these C class roads across our 	<p>The concern regarding potential traffic redistribution should sustainable transport schemes reduce traffic capacity is noted. The purpose of introducing such schemes is to achieve mode shift away from private vehicles, which would reduce traffic congestion. The design and planning of schemes identified within the STS would need</p>



	<p>parish take up to 60,000 vehicles a week, at least half of the commuter traffic that the A419 is designed to take. Any cycle provision must not result in a reduction in motorised vehicle highway width that will force even more commuter traffic across the Commons.</p>	<p>to demonstrate the full effects of a scheme, which would include effect on traffic capacity. It should be noted that the STS does not specifically propose that schemes should reduce traffic capacity, although it does not rule it out as a potential outcome.</p>
Slimbridge Parish Council (37) PS37	<ul style="list-style-type: none"> The amended consultation documents do not address any of the concerns raised in the previous objection. Indeed, they compound the concerns raised previously as they assume an even greater trip transfer to sustainable modes without any justification other than a “greater level of ambition”. The levels of housing included within the DLP have increased considerably and will inevitably generate more traffic in the vicinity of PS37 Wisloe than was considered previously yet no additional mitigation is proposed. The “greater level of ambition” for transfer to sustainable modes conveniently offsets any additional traffic although there can be no guarantee that the ‘ambition’ will be realised in part or in total. No evidence has been provided to support a strategy which assumes high quality pedestrian, cycle and public transport infrastructure can be provided for the Wisloe site and the new higher assumed percentage reduction in vehicle trips (50% increase) is predicated on just such a provision. 	<p>The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. The assessment has been undertaken on the basis of best practice and industry-standard guidance.</p> <p>The STS and STS Addendum justifies why the proposed level of mode switch from car-based travel to sustainable transport can be made. The mode shift is enabled by specific sustainable transport initiatives and / or infrastructure proposals.</p> <p>The mode shifts presented have been agreed with the relevant Highway Authorities, including GCC and National Highways and between the representing transport planning professionals. The STS Addendum outlines more robust mode share following acknowledgement from the Highway Authorities that more ambitious targets are likely to be achievable. The Highway Authorities have been keen throughout discussion on the STS not to promote overly-ambitious mode shift and as such the values presented in the STS Addendum are considered to be practicable and realistic. Furthermore, the TFR includes scenarios without the STS mitigations.</p>
	<ul style="list-style-type: none"> Previous experience shows developers have a poor record delivering infrastructure projects which are invariably late (houses first). To even be considered viable the proposed M5 bike/footbridge must be mandated, no choice. Similarly, the proposed public 	<p>The provision of pedestrian / cycle connections to Cam and Dursley railway station and contributions to public transport measures are key requirement of this site, as outlined in the STS and STS addendum. This is established through Local Plan Policy and planning applications will need to come forwards in accordance with the made Development</p>



	<p>transport improvements must be mandated and not left open to 'market forces' which most likely would ultimately result in a return to personal car travel.</p>	<p>Plan. The timing of delivery of mitigation measures will be determined through the planning application process.</p>
<p>Tritax Symmetry Limited (38) PS43</p>	<ul style="list-style-type: none"> Tritax Symmetry (Gloucester) Ltd accept that they should make a reasonable and fair contribution to infrastructure works to mitigate the impact of their proposal. <p>The proposal is for upto 105,000 sqm of Storage and Distribution (B8).</p> <p>Traffic movements from the proposed scheme are around 12.5% of that forecast for the B1/B2/B8 allocation.</p> <p>Based on the evidence documents submitted a contribution to the M5 Junction 12 Mitigation package of circa £145,000 is considered reasonable to past the tests for S106 payments.</p> <p>The significant reduction in trips from the application proposal negates the need for the dualling of the B4008 when the new grade-separated Junction 12 and signalised approach lanes (and signal optimisation) is completed.</p> <ul style="list-style-type: none"> All allocations should be expected to contribute to infrastructure costs including any works to the B4008. 	<p>The level of contributions to the B4008 scheme (part of the M5 J12 Package) is outlined in the TFDP. The requirement for sites not outlined in the TFDP to contribute to this scheme will be determined through the planning application process.</p> <p>It is noted that the development proposals that are proposed differ from the allocation that has been assessed, and that this results in a significant reduction in traffic generation. It is understood that a planning application has been brought forwards setting this out, with the traffic generation and impacts agreed with GCC and NH. As set out throughout this response, the TFR is a strategic level assessment to determine the strategic mitigation needs of the SLP as a whole. It is expected that planning applications and associated Transport Assessments will assess the specific details of development proposals as they come forwards. It is agreed that the mitigation proposed should be proportional to the level of impact assessed by the planning application, and that it should be agreed and secured by the relevant highways and planning authorities at that stage.</p>
<p>Stroud Town Council (39)</p>	<ul style="list-style-type: none"> Stroud Sustainable Transport Strategy – Members were very disappointed that despite there being a number of schemes in Stroud, there is no funding allocated despite it all still being required. 	<p>Comment noted.</p>



	<ul style="list-style-type: none"> We are seriously concerned under EB108 that there seems to be no coherent plan for good bus services in Stroud District. 	<p>The STS is not designed to provide a delivery plan for bus services in the District, this would be in the scope of GLTP4 and BSIP. The STS sets out a strategic approach to delivering improved bus infrastructure and services, with a requirement for contributions from developers.</p>
	<ul style="list-style-type: none"> EB108 3.10, the Eco park at M5 J13 is dependent on proposed development being completed. There are more people coming into Stonehouse than going out, but it is also not a primary route in for people coming into our district. Is there a need for a multi modal travel exchange hub? The Committee suggest a car hub with a shuttle connection to Stonehouse main station. 	<p>Provision of a “car hub” is not in accordance with the objectives of the STS, but the multi-modal hub does not preclude car-based modes e.g. car sharing.</p>
<p>CarneySweeney (46) G1, CP6, CP13, EL12</p>	<ul style="list-style-type: none"> G1 South of Hardwicke is aligned with the Sustainable Transport Strategy Addendum in that it can offer a realistic choice of sustainable transport modes, limiting the need to travel by car by maximising accessibility to low-carbon modes of transport, with walking, cycling and public transport prioritised. This will help towards achieving SDC’s target of carbon neutrality by 2030. 	<p>Comment noted.</p>
	<ul style="list-style-type: none"> The STS Addendum sets out updates to site proposals which, in respect of G1 South of Hardwicke, includes the provision of cycling and walking routes connecting to Quedgeley West. The development could construct routes up to the boundary with the Quedgeley West site, but works to form any connection to Quedgeley West itself would have to be with the agreement of the owner of the site, which cannot be guaranteed, and this should be reflected in any revised policy wording. Access to Quedgeley West by active travel would be achievable via the A38. 	<p>Comment noted.</p>



	<ul style="list-style-type: none"> Additional interventions have been identified, which include a strategic Park & Ride and interchange hub at M5 J12 although is not identified as a scheme in the IDP Addendum and no location has been identified and this needs to be addressed. Clearly the G1 South of Hardwicke site would not be an appropriate location given that it is Gloucester side of the Cross Keys Roundabout, which is a pinch-point for traffic, and a strategic interchange would take up a substantial area of land thus reducing the number of dwellings that could be delivered on the site. 	<p>Comment noted.</p> <p>The potential P&R/interchange hub at M5 J12 is a GCC measure identified in GLTP4.</p>
Minchinhampton Local Plan Response Group (48)	<ul style="list-style-type: none"> Minchinhampton, due to its location, is not a place that can support sustainable transport, unless the bus services are significantly increased 	Comment noted.
Blue Fox Planning Ltd (53)	<ul style="list-style-type: none"> The developer of proposals at Cam North West (PS24) is supportive of strategies that serve to encourage trips by sustainable modes of transport. Thus, contributions will be made to sustainable transport strategies relating to key routes on desire lines from the site. Any contributions would however need to be proportionate and reflect the scale of the likely impact from these proposals. 	Comment noted.
	<ul style="list-style-type: none"> Page 18 of document EB108 refers to the draft allocation being increased from 700 new dwellings to 900 dwellings and states that this increase will generate greater demand for sustainable and active travel services and routes. The current planning application at Cam North West is for up to 1,030 dwellings and documents submitted with this application demonstrate that this level of development is achievable and sympathetic to the local area. It is noted that an increase in 	Comment noted



	<p>development numbers would also enhance bus patronage further and would therefore serve to contribute to the viability of high quality and convenient public transport connections in the long term to the benefit of the existing residents of the local area.</p>	
<p>Haydn Jones Stroud District Council – Councillor (54)</p>	<ul style="list-style-type: none"> Estimated figures for motorway and other road improvements are woefully optimistic and unsubstantiated. 	<p>The costs for M5 J12 and A38 Corridor improvements are indicative and as provided in the IDP, which is based on cost bands within the Gloucestershire Local Transport Plan (GLTP). This is considered suitable for the purposes of funding and delivery planning to demonstrate the acceptability of the SLP. The costs for M5 J14 have been prepared in more detail based on an indicative layout provided by NH, which accounts for optimism bias and contingency. The TFDP outlines the proportion of funding to be split between allocation sites for the key infrastructure so this can be applied to future infrastructure costs for the three schemes as more details on the schemes are developed. It is explicitly set out within the TFDP that the costs included within the assessment have used different source methodologies, and this has been accounted for within the viability assessment.</p>
	<ul style="list-style-type: none"> Even before inflation these costs do not reflect the reality of such major works. 	<p>See comment above.</p>
	<ul style="list-style-type: none"> The highways department have continually highlighted the severe inadequacies of proposed plans at PS36 and PS37. Stroud Strategic Planners and promoters of preferred sites have tried to narrow the gap by exaggerating modal shift and underestimating costs for road improvements in an attempt to demonstrate viability. Practical evidence for modal shift is away from public transport into personal transport and significantly increased costs for civil engineering works. 	<p>The STS and STS Addendum justifies why the proposed level of mode switch from car-based travel to sustainable transport can be made. The mode shift is enabled by specific sustainable transport initiatives and / or infrastructure proposals.</p> <p>The mode shifts presented have been agreed with the relevant Highway Authorities, including GCC and National Highways and between the representing transport planning professionals. The STS Addendum outlines more robust mode share following acknowledgement from the Highway Authorities that more ambitious targets are likely to be achievable. The Highway Authorities have been keen throughout discussion on the STS not to promote overly-</p>



		ambitious mode shift and as such the values presented in the STS Addendum are considered to be practicable and realistic.
Gloucestershire County Council (officer-level response only) (55)	<ul style="list-style-type: none"> • GCC officers are satisfied that previous comments raised have now been addressed. • However, previously voiced concerns about the Whaddon and Sharpness allocations remain. 	Comments noted.
Cam Parish Council (57)	<ul style="list-style-type: none"> • Due to lack of Public transport provision, residents rely heavily on car usage. This transport strategy relies too heavily on the provision of the Cam/Uley Greenway of which parcels of land are currently missing making deliverability difficult. Using the main road structure is not ideal, creating and relying upon such a problematic idealism is not considered best practice 	Comment noted.
	<ul style="list-style-type: none"> • The pinch point (rail bridge on A4135) is not noted as being problematic throughout any documentation. The lack of safe pedestrian/cycle provision linking the A4135 to the A38 is a major issue when used as an asset to linking the communities either to services or employment. 	The STS states, in relation to Wisloe, “The development should provide high-quality, accessible and safe cycling and walking routes, connecting the site and facilities in Lower Cam, Cam, local centre, Draycott and Cam and Dursley stations. Furthermore, appropriate off-site active travel infrastructure and routes to be put in place to connect the new development with NCR41 to the north and Cam and Dursley Greenway to the south” The specific measures to deliver this will be determined through the Planning Application for the development site.
	<ul style="list-style-type: none"> • Lack of trigger points within the supporting documentation could mean delays of relevant services not forthcoming as needed. 	Delivery / triggers for the provision of site-specific infrastructure suitable to be addressed at planning application stage. Key consideration for the STS is the end position on the Local Plan once all development / infrastructure has been provided.
Avison Young (56)	<ul style="list-style-type: none"> • While we are supportive of the Stroud Local Plan Review progressing to adoption, we wish to clarify whether the possibility of achieving mitigation through an appropriate balance between sustainable travel measures and the construction of new highways capacity through the "predict and 	SDC will welcome provision of transport strategies for all development in accordance with ‘decide and provide’ methodology at the time of future planning submissions where it is based on suitable evidence. The mitigation of crucial highway impacts and provision of strategic sustainable transport infrastructure is to be considered at the Local Plan stage to ensure holistic provision and maximisation of District-wide benefits.



	provide" approach has been fully explored by the Highways Authority.	
Roads Consultancy Ltd (58)	<ul style="list-style-type: none"> Assumptions made the report are without basis and evidence, and therefore the conclusions are incorrect. The evidence which underpin the conclusions must be accurate. There are some substantial issues missing from the document. 	<p>Comment noted.</p> <p>It would be helpful if the assumptions in question were highlighted to enable SDC to strengthen or clarify evidence, or to respond appropriately.</p>
Hamfallow Parish Council (61)	<ul style="list-style-type: none"> In the absence of any information from SDC dealing with the serious doubts raised by the statutory consultees, Gloucestershire County Council and National Highways to the last consultation, we maintain that our earlier comments on the inadequacy of the STS in respect of PS36 still stand. 	SDC disagrees with this assessment of accessibility for site allocation PS36. The site scores well in the SALA accessibility assessment in terms of proximity and access to existing services and facilities. The size of the development will enable significant investment / delivery of sustainable transport infrastructure which otherwise would be less certain compared to a number of smaller sites. The size of the development also unlocks public transport viability, and material levels of internal trips within the development, reducing the need for travel on the existing highway network.
BaSRAG (Berkeley and Sharpness Residents' Action Group) (64)	<ul style="list-style-type: none"> Very little new evidence to address concerns about accessibility of PS36 and no evidence to support the feasibility of rail proposals to connect Sharpness. 	SDC disagrees with this assessment of accessibility for site allocation PS36. The site scores well in the SALA accessibility assessment in terms of proximity and access to existing services and facilities. The size of the development will enable significant investment / delivery of sustainable transport infrastructure which otherwise would be less certain compared to a number of smaller sites. The size of the development also unlocks public transport viability, and material levels of internal trips within the development, reducing the need for travel on the existing highway network.
Individuals	<ul style="list-style-type: none"> Summarised comments 	Stroud District Council Response
(1)	The traffic plan identified for Cole Avenue, Epney Road and St Barnabas Roundabout needs to be implemented ahead of any build / increase in traffic levels	Comment noted.
(6)	<ul style="list-style-type: none"> With regard to PS36 the only suggestion is better public transport links but there is no indication as to how this would be provided 	The STS highlights a need for high-quality and accessible cycling and walking routes, connecting to employment, local and educational



		centres in addition to internal active travel infrastructure and also highlights the need for car-sharing and MaaS measures for this allocation.
(7)	<ul style="list-style-type: none"> While the plan mentions foot and cycle paths from the planned developments to important sites such as the railway station and Cam centre, it fails to mention any improvements/increase of public transports from Cam/Dursley to Gloucester and Bristol that will surely be required with the large increase in residents, many of which are going to commute, and if we are serious about green transport and limiting road traffic. 	This matter will be considered as part of individual future applications and will utilise the Sustainable Transport Strategy and Addendum to encourage modal shift.
	<ul style="list-style-type: none"> Bus services not adequate 	Comment noted.
(10)	<ul style="list-style-type: none"> Pedestrian safety and traffic calming measures are needed 	Comment noted.
(14)	<ul style="list-style-type: none"> Build a bridge over the M5 to connect Wisloe site to the railway station Improve rail services Improve bus services 	Comment noted.
(15,45,60,62)	<ul style="list-style-type: none"> Report focusses on the sustainability aspect of transport. The references to Mobility as a Service (Maas), bike hire schemes and suggested transport shift to cycling/walking and use of train and bus are unsubstantiated with no evidence offered 	It is correct that the Sustainable Transport Strategy focuses on Sustainable Transport. Traffic capacity impacts are set out in the Traffic Forecasting Report. The inclusion of these measures within the STS has been mutually agreed with the relevant Highway Authorities, including GCC and National Highways.
(16)	<ul style="list-style-type: none"> The re-opening of the railway at Sharpness would decrease commuter traffic volumes, so while I appreciate it is costly, would be a scheme I would fully support. 	Comment noted.
(16)	<ul style="list-style-type: none"> Like to point out the lack of pavement along Alkington Lane 	Comment noted.
(17)	<ul style="list-style-type: none"> The strategy is not holistic and interconnectivities and sensitivities are not explained. The test of 	Comment noted. SDC disagrees with this reading of the STS and notes the range of different types of measures set out within the STS to



	<p>whether sustainable transport is delivered requires a much more overarching picture to be presented. A section is then required that demonstrates how the strategy addresses the sustainable travel hierarchy and the compromises and risks to that.</p>	<p>provide a holistic approach. The STS highlights the sustainable transport hierarchy, and the relative issues and opportunities in providing for different journey types, as well as the potential benefits in terms of mode shift.</p>
(19,30)	<ul style="list-style-type: none"> Report is very aspirational and much depends on connecting Wisloe to the railway station and transport hub by means of a bridge over the motorway for walkers and cyclists, which is not guaranteed 	<p>Pedestrian / cycle connections to Cam and Dursley railway station are included in the STS and would be required as part of any strategic development at this location.</p>
(31,33)	<ul style="list-style-type: none"> Measures to reduce car ownership outright are unrealistic and will cause problems for surrounding villages. 	<p>Comment noted.</p>
(40,43,50,58,65)	<ul style="list-style-type: none"> Roads/junctions at capacity A38 Proposed traffic lights at Berkeley may make these junctions less dangerous but no improvements are planned to Breadstone which is highly dangerous 	<p>Comments noted.</p>
(40)	<ul style="list-style-type: none"> Railway lines and carparks at capacity 	<p>Comment noted.</p>

