

Consultation Summary Housing Delivery

Background

Stroud District Council (SDC) submitted the draft Local Plan to the Planning Inspectorate for Examination in October 2021. Hearing sessions commenced in March 2023 and were paused in June 2023 to allow a summer break. The majority of the hearing sessions have already been held and have covered all strategic and local site allocations and most of the policies set out in the draft Local Plan. Details of the Examination and the Examination Library are available on the Local Plan Examination webpage.

During the Examination summer break, the Inspectors wrote to the Council on 4 August 2023, ID-010 in the Examination Library, setting out concerns with three areas of soundness:

1. The capacity of the Strategic Road Network (SRN), specifically the capacity of M5 Junctions 12 and 14 to accommodate proposed housing growth;
2. The proposed passenger train service and bespoke Mobility as a Service transport scheme (MaaS) at Strategic Site Allocation PS36 Sharpness New settlement on the grounds of viability and deliverability.
3. The provision of the pedestrian and cycle bridge over the M5 motorway at Strategic Site Allocation PS37 Wisloe New settlement on the grounds of viability and deliverability.

Additional information and a commitment to address the Inspectors' specific viability and deliverability concerns relating to Strategic Site Allocations PS36 Sharpness new settlement and PS37 Wisloe new settlement were submitted to the Inspectors in September 2023.

A Joint Action Plan with National Highways (NH), Gloucestershire County Council (GCC) and South Gloucestershire Council (SGC) to address issues relating to the capacity of the SRN was submitted to the Inspectors on 30 November 2023.

A further letter from the Inspectors dated 5 February 2024, ID-015 in the Examination Library, granted a pause in the Examination until December 2024 to allow the work set out in the Joint Action Plan and additional work relating to PS36 and PS37 to be completed and a six-week period of public consultation on the outcomes of the workstreams to be carried out.

Summary of representations:

The outcomes of this additional work were published for consultation between Monday 9 September to 5pm on Wednesday 23 October 2024. The representations will be published in full alongside this summary document, but as requested by the Inspectors a summary of comments and responses is available below.

Q. Do you have any comments on the housing trajectory presented in EB134 Housing Delivery?

| Rep Number | Stakeholder Name Organisation OBO | Comments | SDC Response |
|-------------------|---|---|--|
| 002 | Nexus Planning on behalf of Crest Nicholson Operations Site promoter PS30 | <p>The Local Plan is being examined based on a housing requirement of 630 dwellings per annum. On this basis, under the terms of the December 2023 version of the NPPF there is only a requirement to identify a supply of 3,150 homes for the five-year period beginning when the Plan is adopted. For these purposes it is assumed that this will be the period covered by columns G-K.</p> <p>The trajectory provided at Appendix 1 of EB134 shows that commitments (large and small sites - incorporating a 22% discount) would deliver 1,858 dwellings during the five-year period. Local site allocations and the windfall allowance would provide 1,035 dwellings. The strategic site allocations unaffected by infrastructure improvements needed to the SRN would deliver a further 632 dwellings, indicating that the claimed five-year supply for sites that the Council believe</p> | <p>SDC confirm the housing requirement and assumed five year period.</p> <p>Appendix 1 of EB135 shows the following housing delivery within the five year period:</p> <p>Commitments = 1,858 Local PS sites & windfall = 1,035 PS19a + PS24 + PS25 = 632 Total supply = 3,525 Total supply excluding windfall = 3,221 Excluding windfall = 4x76 = 304 = 3,221</p> <p>In summary, the above five year supply, excluding windfall, of 3,221 dwellings is greater than the minimum housing requirement of 3,150 dwellings based on an annual housing need of 630 dwellings.</p> |

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| | | <p>are deliverable without the SRN works coming forward is 3,525 dwellings, constituting the five-year supply that is required by the December 2023 version of the NPPF. These figures would allow the Council to also discount the windfall allowance from the five-year supply (304 dwellings/3,221 dwellings) and retain the necessary supply.</p> | |
| | | <p>The evidence being consulted upon does not include deliverability statements/evidence provided in support of the figures, only a statement that the figures used are based on advice from the owners/promoters of the sites in question. The Inspectors will need to be satisfied given the relatively small margin of comfort that the evidence is robust.</p> | Comment noted |
| | | | |
| 003 | <p>McLoughlin Planning on behalf of Seven Homes</p> <p>Site promoter PS44</p> | <p>Seven Homes has reservations about the housing trajectory and the robustness of the assumptions made in it regarding the deliverability of the strategic sites within the Plan period.</p> | Comment noted |

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| 004 | <p data-bbox="405 416 618 584">McLoughlin Planning on behalf of Avant Homes</p> <p data-bbox="405 663 618 775">Site promoter alternative site, Land at Dursley</p> | <p data-bbox="674 416 1357 568">Avant Homes has reservations about the housing trajectory and the robustness of the assumptions made regarding the deliverability of the strategic sites within the Plan period.</p> | <p data-bbox="1391 416 1626 448">Comment noted</p> |
| 005 Email | <p data-bbox="405 879 618 1046">Knight Frank on behalf of Harper Crewe Limited</p> <p data-bbox="405 1126 651 1310">Site promoter alternative strategic site on land east of A38 at Moreton Valence</p> | <p data-bbox="674 879 1357 1110">The representor did not follow the questions set by the consultation or provide a summarised response. Therefore the Council has had to provide the summary included here. The Council takes no responsibility for the accuracy of the summary.</p> <p data-bbox="674 1126 999 1158">Main areas of concern:</p> <ul data-bbox="674 1190 1290 1358" style="list-style-type: none"> • Improvements to M5 J12 & J14 <ul style="list-style-type: none"> ○ Sufficient sites to provide initial 15% of funding ○ Sufficient funds for remaining 85% | <p data-bbox="1391 879 2029 991">This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14.</p> <p data-bbox="1391 1023 2029 1126">No additional sites are being considered by the Inspectors as part of the current Local Plan Examination.</p> |

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| | | <ul style="list-style-type: none"> ○ Impact on timing of junction improvements and housing delivery ● Mitigation measures for SAC <ul style="list-style-type: none"> ○ no evidence re current or future deliverable SANG sites ● Assumed housing trajectory <ul style="list-style-type: none"> ○ Based on 630 dpa v 844 dpa under the proposed standard method 2024 ○ Increase of 214dpa and a significantly increased overall housing requirement ○ Housing delivery concerns based on a review of the strategic and local site allocations ● Suggest additional site at Moreton Valence <ul style="list-style-type: none"> ▪ 1,500 dwllgs ▪ Immediate first phase c400 dwllgs ▪ Contribute to J12 improvements ▪ On-site bespoke SANG for Cotswold Beechwoods SAC | |
| | | | |
| 009 Email | Pegasus on behalf of | The trajectory indicates that approximately 15,164 dwellings could be delivered by the end of the plan period (2040) if all the assumptions held, | Matter 7 Housing Provision, including overall housing supply and the delivery trajectory over |

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| | <p>Robert Hitchins Ltd Site promoter part Strategic site allocation PS19a and part Strategic site allocation PS24. Also promoter of alternative strategic development site at Grove End Farm, Whitminster</p> | <p>against a requirement of about 12,600 dwellings, but this is reliant upon the new settlement at Sharpness delivering in year 29/30 and for Wisloe in year 26/27</p> <p>Despite the delay in the examination of the plan the housing trajectory for PS36 Sharpness is only delayed by one year from 28/29 to 29/30 and provides a higher figure for completions in 29/30 (155 dwellings) and still aims to be completed in the plan period, this is unsubstantiated given the evidence provided.</p> <p>Furthermore, the expected completions for Sharpness new settlement increase by 20 dpa from year 30/31</p> <p>Given the objections to both the new settlements and the long lead in times for large sites the Council should not rely on completion from these sites in the years indicated.</p> | <p>the plan period will be fully reviewed at a future hearing session.</p> <p>The developers of PS36 are confident on the predicted phased development of the Sharpness New Settlement and consider that the build-out rates provided for the development are realistic and deliverable.</p> |
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| 015 | Paul Tempest | Change of ownership of package PS41 - this allocation now unlikely to proceed. | <p>Comment noted.</p> <p>This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14, PS36 New</p> |

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| | | | <p>settlement at Sharpness and PS37 New settlement at Wisloe.</p> <p>Local Site Allocation PS41 Land at Washwell Fields, Painswick (20 dwellings) is identified in EB135 Appendix 1 for delivery later in the plan period and as a site with no impact on M5 J12 or J14.</p> |
| 016 | Lucy Biddle | Ludicrously optimistic | Comment noted |
| 021 | Virginia Jackson | <p>Reports EB134 and Appendix 1 show the draft Local Plan is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target.</p> | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. |
| | | <p>The table duplicates tab 1 in EB135, apart from missing 173 dwellings in PS37.</p> | <p>The delivery trajectory has been updated by the site promoter in the light of the pause to the Local Plan Examination, with PS37 now anticipated to deliver 1,327 dwellings within the plan period to 2040.</p> |

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| 022 | Steve Jackson | Reports EB134 and Appendix 1 show the draft Local Plan is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target. | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. |
| | | The table duplicates tab 1 in EB135, apart from missing 173 dwellings in PS37. | The delivery trajectory has been updated by the site promoter in the light of the pause to the Local Plan Examination, with PS37 now anticipated to deliver 1,327 dwellings within the plan period to 2040. |
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| 023 | Patrick Swift Minchinhampton Local Plan Response Group | What is the status of now excluded safeguarded sites/ or land? | The status of safeguarded sites was discussed at earlier Examination hearing sessions and is under review by Inspectors. |
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| 024 | Susan Leleu | Reports EB134 and Appendix 1 show that the LP is overly dependent upon strategic sites along A 38/M5 corridor in order to achieve the housing targets. | The Local Plan Spatial strategy was considered at the Matter 2 Examination |

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| | | | hearing session on 8/3/2023 and is not part of the current consultation. |
| | | This is causing significant issues in respect of junctions 12 and 14 of M5 as they contribute to the problematic traffic loading issues at those junctions. | This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14. |
| | | These sites are unlikely to be delivered with the LP timescale due to the works required to meet capacity issues, therefore those sites should be removed from the LP and only those that will use junction 13 should be included as that junction does not have the capacity issues of the other two, until such time as NH consider it safe to for other LP sites to progress. | <p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14:</p> <ul style="list-style-type: none"> • excluding sites impacting on M5 Junction 12 only • excluding sites impacting on M5 Junction 14 only • excluding sites impacting on M5 Junctions 12 and J14 • excluding sites impacting on M5 Junctions 12 and J14 but with an interim scheme used to deliver 1,000 homes at PS36 Sharpness new settlement • excluding sites impacting on M5 Junctions 12 and J14 but with an interim scheme Option A used to deliver 1,000 homes at PS36 Sharpness new settlement |

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| | | | <ul style="list-style-type: none"> • excluding sites impacting on M5 Junctions 12 and J14 but with an interim scheme Option B used to deliver 1,000 homes at PS36 Sharpness new settlement • excluding sites impacting on M5 Junctions 12 and J14 but with an interim scheme Option B used to deliver the equivalent of 1,000 homes at PS36 Sharpness new settlement across a range of sites on a first come/ first served basis from a range of sites impacting J14. <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p> |
| | | <p>One of the sites that seems to have been ignored in accessing the motorway junctions is land at Whaddon (G2). It is planned to build 3000 houses, yet this land is immediately next to junction 12 and will have a huge impact on traffic load and should be included in the report EB135</p> | <p>Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. The site does not form part of the spatial strategy to meet Stroud District’s housing needs and does not form part of the Local Plan housing trajectory. The site is not a current commitment with planning permission</p> |

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| | | | or allocated by any adjoining Local Authority to meet their housing need and does not therefore constitute 'planned growth' to be included in the transport modelling. |
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| 025 | Jeremy Akers | Reports EB134 and Appendix 1 show the draft Local Plan is overly dependent on strategic sites in the A38 / M5 corridor to achieve the housing target. | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. |
| | | This duplicates tab 1 in EB135 apart from missing 173 dwellings in PS37 | The delivery trajectory has been updated by the site promoter in the light of the pause to the Local Plan Examination, with PS37 now anticipated to deliver 1,327 dwellings within the plan period to 2040. |
| | | | |
| 026 | Graham Ellis | This trajectory is over reliant on the 'strategic sites', which will directly impact the M5 J12 and J14. Only sites near M5 J13 should be progressed, although access from/to Stroud and M5 J13 is also heavily overloaded at peak times. (This road should have been dualled as a part of the current playing fields work). Given the extent of the Stroud council area, it is surprising that few other sites | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios setting out projected |

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| | | are included in the local plan. At this stage, nothing else should be included in the local plan until after the upgrades to M5 J12 and J14 are completed. | housing delivery excluding sites impacting on M5 Junctions 12 and 14. |
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| 027 | Sian Hill | The Local Development Plan is putting all its eggs in one basket by only looking at sites on the M5/A38 corridor. Also the 800+ houses in Cam still to be built (Box Road) do not appear to have been included in the figures for Junction 14 of the M5. | <p>The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation.</p> <p>The Strategic modelling has taken account of committed development and proposed SDLP allocations. This includes sites in Cam.</p> |
| | | | |
| 028 | <p>PJS Development Solutions Ltd on behalf of Bathurst Ltd</p> <p>Site promoter PS25</p> | The housing trajectory lacks evidential credibility. | EB134 Housing Delivery sets out the sources of delivery data for the constituent elements of the housing trajectory. |
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| 029 | Sarah Bowles | <p>The strategic sites which will increase the loading on Junctions 12 and 14 should not be included in the Local Plan until National Highways can confirm that the additional journeys can be safely accommodated by the transport network. Without these strategic sites, the Local Plan is undeliverable and unsound. In order to provide a meaningful, realistic, joined-up approach to housing provision, ALL developments should be included in ALL modelling, regardless of legislative boundaries and preferred narratives. I have little confidence that this will take place.</p> | <p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p> <p>The traffic modelling incorporates appropriate forecasting methods to account for all development. The method of accounting for developments is based on the status of the development in the planning process, rather than the location, it is not due to legislative boundaries or preferred narratives. All development proposed by the SDLP is directly added to the model in the “with Development” (also known as “Do Something”) model. Development sites, both within Stroud and in neighbouring authorities, which are “committed” are directly added to the model. Where it is known that there will be housing growth, but specific sites are not committed through either planning applications or Local Plan allocations, it is necessary to apply</p> |

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| | | | housing and employment growth assumptions to the area as a whole. This is DfT methodology and has been agreed with the relevant highways authorities. It does not mean that development outside of Stroud District has not been included. |
| | | | |
| 032 | David Thombs | Reports EB134 and Appendix 1 show that the LP is overly dependent upon strategic sites along A 38/M5 corridor in order to achieve the housing targets . | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. |
| | | This is causing significant issues in respect of junctions 12 and 14 of M5 as they contribute to the problematic traffic loading issues at those junctions. | This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14. |
| | | These sites are unlikely to be delivered with the LP timescale due to the works required to meet capacity issues, therefore those sites should be removed from the LP and only those that will use junction 13 should be included as that junction does not have the capacity issues of the other two, until such time as NH consider it safe to for other LP sites to progress. | EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14. SDC believe that the work produced through the JAP addresses the strategic network |

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| | | <p data-bbox="674 451 1368 679">One of the sites that seems to have been ignored in accessing the motorway junctions is land at Whaddon (G2). It is planned to build 3000 houses, yet this land is immediately next to junction 12 and will have a huge impact on traffic load and should be included in the report EB135</p> | <p data-bbox="1391 344 1980 411">concerns and that the full trajectory will be delivered.</p> <p data-bbox="1391 451 2033 994">Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. The site does not form part of the spatial strategy to meet Stroud District’s housing needs and does not form part of the Local Plan housing trajectory. The site is not a current commitment with planning permission or allocated by any adjoining Local Authority to meet their housing need and does not therefore constitute ‘planned growth’ to be included in the transport modelling.</p> |
| | | | |
| 033 | Suzanne Prosser | The building of the houses all at the same time across a number of years is not sustainable unless this is preceded or coincides with rail and road schemes. The developments at PS34 and PS36 are particularly unsuitable given the necessity to exit the area onto the A38 by small country lanes which do not have the capacity for | This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14, PS36 New settlement at Sharpness and PS37 New settlement at Wisloe. |

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| | | additional building given that there has already been a lot of development around Berkeley and Jct 12/13 which causes delays at peak times already. | |
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| 034 | Owen Leleu | Reports EB134 and Appendix 1 show that the LP is overly dependent upon strategic sites along A 38/M5 corridor in order to achieve the housing targets . | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. |
| | | This is causing significant issues in respect of junctions 12 and 14 of M5 as they contribute to the problematic traffic loading issues at those junctions. | This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14, PS36 New settlement at Sharpness and PS37 New settlement at Wisloe. |
| | | These sites are unlikely to be delivered with the LP timescale due to the works required to meet capacity issues, therefore those sites should be removed from the LP and only those that will use junction 13 should be included as that junction does not have the capacity issues of the other two, until such time as NH consider it safe to for other LP sites to progress. | EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14. SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered. |

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| | | One of the sites that seems to have been ignored in accessing the motorway junctions is land at Whaddon (G2). It is planned to build 3000 houses, yet this land is immediately next to junction 12 and will have a huge impact on traffic load and should be included in the report EB135 | Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. The site does not form part of the spatial strategy to meet Stroud District's housing needs and does not form part of the Local Plan housing trajectory. The site is not a current commitment with planning permission or allocated by any adjoining Local Authority to meet their housing need and does not therefore constitute 'planned growth' to be included in the transport modelling. |
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| 035 | Danielle Ellis | Reports EB134 and Appendix 1 show the draft Local Plan is appears to rely on strategic sites in the A38/M5 corridor to achieve the housing target rather than other locations across Stroud District. | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. |
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| 036 | Jessica Cuthbert-Smith | The table is the same as table in EB135, but with 173 fewer dwellings in PS37. The trajectory is still overly dependent on sites in the A38/M5 corridor | The delivery trajectory has been updated by the site promoter in the light of the pause to the Local Plan Examination, with PS37 now |

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| | | | anticipated to deliver 1,327 dwellings within the plan period to 2040. |
| 037 | David Scammell | Reports EB134 and Appendix 1 show the draft Local Plan is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target. | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. |
| | | This table duplicates tab 1 in EB135, apart from missing 173 dwellings in PS37 | The delivery trajectory has been updated by the site promoter in the light of the pause to the Local Plan Examination, with PS37 now anticipated to deliver 1,327 dwellings within the plan period to 2040. |
| 038 | Vanessa Davies | The trajectory is not proportionate, the scale of the development is too big. | This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14, PS36 New settlement at Sharpness and PS37 New settlement at Wisloe. |
| 039 | Philip Butcher | Reports EB134 and Appendix 1 show the draft Local Plan is overly dependent upon strategic | The Local Plan Spatial strategy was considered at the Matter 2 Examination |

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| | | sites in the A38/M5 corridor to achieve the housing target. | hearing session on 8/3/2023 and is not part of the current consultation. |
| | | This table duplicates tab 1 in EB135, apart from missing 173 dwellings in PS37 | The delivery trajectory has been updated by the site promoter in the light of the pause to the Local Plan Examination, with PS37 now anticipated to deliver 1,327 dwellings within the plan period to 2040. |
| | | | |
| 040 | Doreen Brimble | I support Slimbridge Parish Council's response to this consultation. Reports EB134 and Appendix 1 show the draft Local Plan is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target with long build out rates. This is supported by various expert reports such as https://www.lichfields.uk/media/5638/how-does-your-garden-grow_a-stock-take-on-planning-for-the-governments-garden-communities-programme.pdf . There are numerous barriers to delivery of strategic sites as set out in numerous Regulation 19 submissions. The trajectory does not take into account the need for significant site infrastructure (in addition to transport | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. Comment noted. |

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| | | infrastructure) i.e. network rail bridges/mitigation, foot and cycling bridge over the M5, acoustic barriers, relocation and re-enforced gas pipeline mitigation. Therefore the trajectory is over optimistic and unrealistic. | |
| | | This table duplicates tab 1 in EB135, apart from missing 173 dwellings in PS37 | The delivery trajectory has been updated by the site promoter in the light of the pause to the Local Plan Examination, with PS37 now anticipated to deliver 1,327 dwellings within the plan period to 2040. |
| | | | |
| 041 | Thomas Owens | I support Slimbridge Parish Council's response to this consultation. Reports EB134 and Appendix 1 show the draft Local Plan is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target with long build out rates. This is supported by various expert reports such as https://www.lichfields.uk/media/5638/how-does-your-garden-grow_a-stock-take-on-planning-for-the-governments-garden-communities-programme.pdf . There are numerous barriers to delivery of strategic sites as set out in numerous Regulation 19 submissions. The trajectory does | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. Comment noted. |

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| | | not take into account the need for significant site infrastructure (in addition to transport infrastructure) i.e. network rail bridges/mitigation, foot and cycling bridge over the M5, acoustic barriers, relocation and re-enforced gas pipeline mitigation. Therefore the trajectory is over optimistic and unrealistic. | |
| | | This table duplicates tab 1 in EB135, apart from missing 173 dwellings in PS37 | The delivery trajectory has been updated by the site promoter in the light of the pause to the Local Plan Examination, with PS37 now anticipated to deliver 1,327 dwellings within the plan period to 2040. |
| | | | |
| 042 | Andrew Davis | Reports EB134 and Appendix 1 show the LP is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target. As clarified in the Reg19 submissions, the Examination Hearing and now EB135, most of these strategic sites contribute significantly to the traffic load on the M5 at junction 12 and 14. | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. |
| | | Only strategic developments which utilise the existing J13 roundabout, which has excess capacity, (like PS19a at Stonehouse) should be included within the LP until NH deem it safe for | EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing |

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| | | <p>additional strategic housing developments to progress. Including the strategic sites, affected by the J12 and J14 constraint, within the LP baseline housing trajectory makes the LP undeliverable and unsound.</p> | <p>delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p> |
| | | <p>It is not appropriate to include earlier housing completions, as the Plan should be looking forward, not backwards.</p> | <p>The draft Local Plan was submitted in October 2021 and sets out the strategy for development to meet the District’s housing, employment and community needs for the plan period 2020 – 2040. The draft Plan sets out the calculation of the amount of housing to be planned for against the District’s housing needs for the plan period with housing supply comprising commitments with planning permission, allocated sites in the Local Plan and a small windfall allowance. Some of these commitments, for the first three years of the plan period to 31 March 2023, are now shown as completions in EB 134 – Appendix 1 Housing Delivery with the delivery of commitments with planning permission projected across the remaining plan period to 2040 in accordance with the latest published monitoring information. Matter 7 Housing</p> |

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| | | | Provision, including housing supply, remains to be considered by the Inspectors at the Examination. |
| | | G2 should be included within EB134, especially as it is immediately next to J12 and should therefore be included within the sensitivity assessment EB135. | Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review . The site does not form part of the spatial strategy to meet Stroud District’s housing needs and does not form part of the Local Plan housing trajectory. The site is not a current commitment with planning permission or allocated by any adjoining Local Authority to meet their housing need and does not therefore constitute ‘planned growth’ to be included in the transport modelling. |
| | | The SoCG from NH clarifying their agreement to EB134 has not been published. | SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors. |
| | | SDC was instructed by the Inspector to remove PS37 from the next 5-year housing supply, but has not done so, EB134 should be amended to reflect this instruction. | Matter 7 Housing Provision, including overall housing supply and the delivery trajectory over the plan period will be fully reviewed at a future hearing session. |

| Rep Number | Stakeholder Name Organisation OBO | Comments | SDC Response |
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| 044 | Helen Bamber | Reports EB134 and Appendix 1 show the draft Local Plan is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target. | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. |
| | | This table duplicates tab 1 in EB135, apart from missing 173 dwellings in PS37 | The delivery trajectory has been updated by the site promoter in the light of the pause to the Local Plan Examination, with PS37 now anticipated to deliver 1,327 dwellings within the plan period to 2040. |
| 045 | Berkeley Town Council | The lack of adequate infrastructure in the Sharpness area will put pressure on existing services many of which are already at capacity eg. primary and secondary schools a health centres. | This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14, PS36 New settlement at Sharpness and PS37 New settlement at Wisloe. |
| 046 | Wisloe Action Group | Reports EB134 and Appendix 1 show the LP is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target. | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation. |

| Rep Number | Stakeholder Name Organisation OBO | Comments | SDC Response |
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| | | <p>As clarified in the Reg19 submissions, the Examination Hearing and now EB135, most of these strategic sites contribute significantly to the traffic load on the M5 at junction 12 and 14. Only strategic developments which utilise the existing J13 roundabout, which has excess capacity, (like PS19a at Stonehouse) should be included within the LP until NH deem it safe for additional strategic housing developments to progress. Including the strategic sites, affected by the J12 and J14 constraint, within the LP baseline housing trajectory makes the LP undeliverable and unsound.</p> <p>PS37 should be removed from the next 5-year housing supply, as was instructed by the Inspectors during the Examination Hearing.</p> <p>The SoCG from NH clarifying their agreement to EB134 has not been published.</p> | <p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p> <p>Matter 7 Housing Provision, including overall housing supply and the delivery trajectory over the plan period will be fully reviewed at a future hearing session.</p> |
| | | <p>Completions are shown from 1/4/20 to 31/3/23, totalling 2148 dwellings. It is not appropriate to include these dwellings as the Plan is looking forward, not backwards.</p> | <p>The draft Local Plan was submitted in October 2021 and sets out the strategy for development to meet the District’s housing, employment and community needs for the plan period 2020 – 2040. The draft Plan sets out the calculation of the amount of housing to be planned for against the District’s housing</p> |

| Rep Number | Stakeholder Name Organisation OBO | Comments | SDC Response |
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| | | | <p>needs for the plan period with housing supply comprising commitments with planning permission, allocated sites in the Local Plan and a small windfall allowance. Some of these commitments, for the first three years of the plan period to 31 March 2023, are now shown as completions in EB 134 – Appendix 1 Housing Delivery with the delivery of commitments with planning permission projected across the remaining plan period to 2040 in accordance with the latest published monitoring information. Matter 7 Housing Provision, including housing supply, remains to be considered by the Inspectors at the Examination.</p> |
| | | <p>EB134 states G2 (land at Whaddon) has been excluded from the assessment. This is appropriate for calculating SDC’s own housing trajectory, but it is not appropriate to ignore the 3000-housing development when assessing the load on J12! G2 is immediately next to J12 and should therefore be included within the sensitivity assessment EB135.</p> | <p>Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. The site does not form part of the spatial strategy to meet Stroud District’s housing needs and does not form part of the Local Plan housing trajectory. The site is not a current commitment with planning permission or allocated by any adjoining Local Authority to</p> |

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| | | | meet their housing need and does not therefore constitute 'planned growth' to be included in the transport modelling. |
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| 049 | Hardwicke Parish Council | The addition of 1350 houses with its main access off the A38 opposite the Hunts Grove primary junction will cause even more congestion in this already extremely busy location. Even WSP hinted that the solution was less than perfect. It seems senseless not attempting to understand the full implications of the potential future traffic movements and at least identify more fully the possible shortcomings of not addressing them as part of the development timeline. More vehicles are using the roads in this area, some of which is because of the continued development at Kingsway and to think that only a moderate increase will happen over the life of this structure plan is being optimistic. Nothing is being proposed to reduce traffic and the improvements to Jcn 12 will only encourage the use of vehicles to commute to work. | This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14, PS36 New settlement at Sharpness and PS37 New settlement at Wisloe. |
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| Rep Number | Stakeholder Name Organisation OBO | Comments | SDC Response |
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| 051 | Scott Temlett | The EB134 Report states that the draft Local Plan is too dependent upon strategic sites along the M5 and A38 corridor to achieve an over exaggerated housing target. | EB134 sets out the latest annualised delivery trajectory for all site allocations in the draft Local Plan. |
| | | Over 800 houses are planned to be built in the Parish of Cam, this has not been properly taken into account with the considerations of J14. | The Strategic modelling has taken account of committed development and proposed SDLP allocations. This includes sites in Cam. |
| 052 | Alex Hunter | The above undermines the feasibility of the Plan and is not achievable | Comment noted |
| 053 | Falfield Parish Council | There must be a clear timetable and strategy for key infrastructure to help minimise road use in place prior to the house building commencing. The effects on of not doing so in a timely way in terms of the impact on our road system and existing residents and communities cannot be mitigated. | All infrastructure including roads is planned well in advance through the Local Plan itself and the Infrastructure Delivery Plan. This work will be refined at the planning application stage and the relevant works will be planned by the County Council and National Highways. |

| Rep Number | Stakeholder Name Organisation OBO | Comments | SDC Response |
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| 054 | Stephen Willetts Resident and Member of the Cam Community Action Facebook Group | As clarified in the Reg19 submissions, Examination Hearings and now EB 134 and Appendix 1 and EB135, strategic sites in the A38/M5 corridor required to deliver targets contribute significantly to the traffic load on the M5 at junction 12 and 14. This includes Cam allocation PS24 with respect to J14 contrary to previous hearing and public statements. If, as in EB133b 4.3.15, a super cluster of Wisloe and Cam is considered holistically even more so, also then including PS25. | Sites at Wisloe and Cam would be expected to contribute to the funding of the J14 improvements, as outlined in EB133b. The reference to a “Super Cluster” in EB133b is not considered to be a fully correct interpretation of EB133b. The reference made is in relation to the interrelation between planned growth at Wisloe and Cam in relation to wider Severn Edge proposals, which forms part of the strategic case for securing funding for the J14 improvements. |
| | | It is not clear how the impact of 800+ houses still to be built shown on the top line of the EB134 appendix 1 at Millfields and Box Road, Cam is properly taken into account in J14 considerations. | The Strategic modelling has taken account of committed development and proposed SDLP allocations. This includes sites in Cam. |
| | | EB134 states G2 (land at Whaddon) has been excluded from the assessment. This is appropriate for calculating SDC’s own housing trajectory, but it is not appropriate to ignore the 3000-housing development when assessing the load on J12! G2 is immediately next to J12 and should therefore be included within the sensitivity assessment EB135. | Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review . The site does not form part of the spatial strategy to meet Stroud District’s housing needs and does not form part of the Local Plan housing trajectory. The site is not a |

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| | | | current commitment with planning permission or allocated by any adjoining Local Authority to meet their housing need and does not therefore constitute 'planned growth' to be included in the transport modelling. |
| | | There is no statement of common ground from NH clarifying their agreement to EB134. | SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors. |
| | | Only strategic developments which utilise the existing J13 roundabout, which has excess capacity, (like PS19a at Stonehouse) should be included within the LP until NH deem it safe for additional strategic housing developments to progress. | EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14 |
| | | | |
| 055 | Slimbridge Parish Council | As clarified in the Reg19 submissions, Examination Hearings and now EB 134 and Appendix 1 and EB135, strategic sites in the A38/M5 corridor required to deliver targets contribute significantly to the traffic load on the M5 at junction 12 and 14. This includes Cam allocation PS24 with respect to J14 contrary to previous hearing and public statements. If, as in EB133b 4.3.15, a super cluster of Wisloe and Cam | Sites at Wisloe and Cam would be expected to contribute to the funding of the J14 improvements, as outlined in EB133b. The reference to a "Super Cluster" in EB133b is not considered to be a fully correct interpretation of EB133b. The reference made is in relation to the interrelation between planned growth at Wisloe and Cam in relation |

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| | | is considered holistically even more so, also then including PS25. | to wider Severn Edge proposals, which forms part of the strategic case for securing funding for the J14 improvements. |
| | | It is not clear how the impact of 800+ houses still to be built shown on the top line of the EB134 appendix 1 at Millfields and Box Road, Cam is properly taken into account in J14 considerations. | The Strategic modelling has taken account of committed development and proposed SDLP allocations. This includes sites in Cam. |
| | | EB134 states G2 (land at Whaddon) has been excluded from the assessment. This is appropriate for calculating SDC's own housing trajectory, but it is not appropriate to ignore the 3000-housing development when assessing the load on J12! G2 is immediately next to J12 and should therefore be included within the sensitivity assessment EB135. | Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review . The site does not form part of the spatial strategy to meet Stroud District's housing needs and does not form part of the Local Plan housing trajectory. The site is not a current commitment with planning permission or allocated by any adjoining Local Authority to meet their housing need and does not therefore constitute 'planned growth' to be included in the transport modelling. |
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| 056 | Cllr Lindsey Green Stroud District Council | <p>Reports EB134 and Appendix 1 show the LP is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target. As clarified in the Reg19 submissions, the Examination Hearing and now EB135, most of these strategic sites contribute significantly to the traffic load on the M5 at junction 12 and 14.</p> <p>Only strategic developments which utilise the existing J13 roundabout, which has excess capacity, (like PS19a at Stonehouse) should be included within the LP until NH deem it safe for additional strategic housing developments to progress. Including the strategic sites, affected by the J12 and J14 constraint, within the LP baseline housing trajectory makes the LP undeliverable and unsound.</p> | <p>The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session 8/3/2023 and is not part of the current consultation.</p> <p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p> |
| | | <p>Completions are shown from 1/4/20 to 31/3/23, totalling 2148 dwellings. It is not appropriate to include these dwellings as the Plan is looking forward, not backwards.</p> | <p>The draft Local Plan was submitted in October 2021 and sets out the strategy for development to meet the District's housing, employment and community needs for the plan period 2020 – 2040. The draft Plan sets out the calculation of the amount of housing to be planned for against the District's housing needs for the plan period with housing supply comprising commitments with planning</p> |

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| | | <p>EB134 states G2 (land at Whaddon) has been excluded from the assessment. This is appropriate for calculating SDC’s own housing trajectory, but it is not appropriate to ignore the 3000-housing development when assessing the load on J12! G2 is immediately next to J12 and should therefore be included within the sensitivity assessment EB135</p> | <p>permission, allocated sites in the Local Plan and a small windfall allowance. Some of these commitments, for the first three years of the plan period to 31 March 2023, are now shown as completions in EB 134 – Appendix 1 Housing Delivery with the delivery of commitments with planning permission projected across the remaining plan period to 2040 in accordance with the latest published monitoring information. Matter 7 Housing Provision, including housing supply, remains to be considered by the Inspectors at the Examination.</p> <p>Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. The site does not form part of the spatial strategy to meet Stroud District’s housing needs and does not form part of the Local Plan housing trajectory. The site is not a current commitment with planning permission or allocated by any adjoining Local Authority to meet their housing need and does not</p> |

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| | | | therefore constitute ‘planned growth’ to be included in the transport modelling. |
| | | PS37 should be removed from the next 5-year housing supply, as was instructed by the Inspectors during the Examination Hearing. | Matter 7 Housing Provision, including overall housing supply and the delivery trajectory over the plan period will be fully reviewed at a future hearing session. |
| | | The SoCG from NH clarifying their agreement to EB134 has not been published. | SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors. |
| | | | |
| 059 | Haydn Jones | <p>The strategy of predetermining the location of strategic development within the M5/A38 corridor is flawed, unsustainable and undeliverable.</p> <p>South Gloucestershire Council have clearly stated that they do not support development at M5J14 within their district.</p> <p>There is a clear dichotomy between the availability of infrastructure capacity and funding to deliver upgrades against proposals at PS36, PS37, PS24, PS25 and the preferences of South Gloucestershire Council.</p> | <p>The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation.</p> <p>There is not a dichotomy between infrastructure capacity and funding, and SGC’s position. SGC supports SDC in bringing forwards its Local Plan, and will be fully engaged in its role as Local Highway Authority when schemes come forward. SGC has made clear that its position is that its own emerging Local Plan does not require a new junction solution. The planned growth in the Draft</p> |

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| | | | Stroud District Council Local Plan is not seeking to commit development in South Gloucestershire to help fund the strategic delivery of J14 as set out in report EB133b. Neither the M5 J12 or J14 funding approach rely upon development outside of SDC's boundaries. |
| | | | |
| 060 | Savills on behalf of Catesby Estates | It would have been extremely helpful if the trajectory had included the safeguarded site at Whaddon. | Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. The site does not form part of the spatial strategy to meet Stroud District's housing needs and does not form part of the Local Plan housing trajectory. The site is not a current commitment with planning permission or allocated by any adjoining Local Authority to meet their housing need and does not therefore constitute 'planned growth' to be included in the transport modelling. |
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| 061 | Denis Bannister | There is a numerical error on dwellings proposed for PS37 between EB134 and EB135" | The delivery trajectory has been updated by the site promoter in the light of the pause to the Local Plan Examination, with PS37 now anticipated to deliver 1,327 dwellings within the plan period to 2040. |
| | | | |
| 062 | <p>Rackham Planning Ltd on behalf of the landowner of Land at Hook Farm, Berkeley</p> <p>Site promoter BER016/ 017 Lynch Road, Berkeley</p> | <p>Rackham Planning act on behalf of the landowner of the land at Hook Farm, Berkeley, which includes the complex of buildings and adjacent land off of Lynch Road, Berkeley. The site and adjoining land is identified as Local Plan site allocation BER016/ 017 Land at Lynch Road, Berkeley. We confirm that the land at Hook Farm, Lynch Road, Berkeley remains available, suitable and deliverable in the identified timeframe of 2025/2026 and 2026/2027. We also consider that the site can accommodate additional housing, up to circa 85 no. units which would make an additional positive contribution to housing delivery and the housing trajectory identified in document EB134 and Appendix 1.</p> | Support noted |
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| 063 | Shelagh Daley | <p>In order to achieve the housing targets reports EB134 and supporting documentation show that the Local Plan is excessively dependent upon strategic sites along parts of the A38 and the M5 corridor. As previously stated this would have a huge impact on Junctions 12 and 14 of the M5. There are no clear indications that works to improve these junctions would be completed prior to any developments in order to achieve SDC's housing target. Those sites should be removed from the Local Plan until realistic timescales and budgets are available from National Highways.</p> | <p>The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation.</p> <p>This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14, PS36 New settlement at Sharpness and PS37 New settlement at Wisloe.</p> <p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p> |
| | | <p>This would then allow SDC to concentrate on developments in the area that would use junction 13; this junction does not have such severe constraints with traffic volumes as junctions 12 and 14.</p> | <p>Comment noted</p> |
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| Rep Number | Stakeholder Name Organisation OBO | Comments | SDC Response |
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| 064 | Jo Kendall | EB134 is not a realistic trajectory and in particular hides the 800+ houses already permitted in Cam | The Strategic modelling has taken account of committed development and proposed SDLP allocations. This includes sites in Cam. |
| 066 | Catherine Wayne | The build rates specified for PS36 are unrealistic and exceed anything previously achieved in the district | The developers of PS36 are confident of the predicted phased development of the Sharpness New Settlement and consider that the build-out rates provided for the development are realistic and deliverable. |
| 067 | Sally Allen | Public transport both bus and Train is almost non existent at the crucial times that people need it. Therefore most residents arriving into the new builds along the proposed corridor will be drivers. It is therefore obvious that these additional drivers will have a huge impact on these already over capacity junctions. The additional traffic will almost certainly impact the A38 along each of the access points for the additional housing. The traffic has increased significantly over the last five years, and this has impacted on road safety and increased accident on all major roads within this area. | Comment noted. This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14, PS36 New settlement at Sharpness and PS37 New settlement at Wisloe. |

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| 069 | Berkeley and Sharpness Residents' Action Group (BaSRAG) | The build rates specified for PS36 appear unrealistic and far in excess of that previously achieved in the district. | The developers of PS36 are confident of the predicted phased development of the Sharpness New Settlement and consider that the build-out rates provided for the development are realistic and deliverable. |
| | | | |
| 070 | Gillian Delve | This shows that in order to achieve it's housing target the Plan is dependant on sites which impact on J12 and J14 of the M5. Given that it has already been said that these would not be allowed by National Highways they should be removed from the Plan. If and when the improvements to the junctions are implemented they could be reconsidered. | <p>The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation.</p> <p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios setting out projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p> |
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| 071 | Darius Ferrigno | Reports EB134 and Appendix 1 show the draft Local Plan is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target. | The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session 8/3/2023 and is not part of the current consultation. |
| | | This table duplicates tab 1 in EB135, apart from missing 173 dwellings in PS37. | The delivery trajectory has been updated in the light of the pause to the Local Plan Examination, with PS37 now anticipated to deliver 1,327 dwellings within the plan period to 2040. |
| | | | |
| 072 | Black Box Planning on behalf of Taylor Wimpey Strategic Land Site promoter G2 Land at Whaddon | The rationale behind the decision to omit the G2 Strategic Allocation (Whaddon) is not clear. Despite its current safeguarded status in the Draft SLP, the examination hearing sessions to date confirmed that it was SDC's expectation that the SLP would catch up sufficiently to confirm the Whaddon site is needed for the neighbouring authority Gloucester City to meet its needs. Indeed, para 3.4.23 of the Draft Plan states; 'It is expected that by the time this Draft Stroud Local Plan has been examined and adopted, the City Council will be able to clearly articulate the nature of unmet needs and the preferred direction of | Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. The site does not form part of the spatial strategy to meet Stroud District's housing needs and does not form part of the Local Plan housing trajectory. The site is not a current commitment with planning permission or allocated by any adjoining Local Authority to meet their housing need and does not |

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| | | <p>growth so that an allocation at Whaddon can be confirmed.'</p> <p>In any event, one would expect Whaddon to be considered within reasonable tolerances for any deliverability trajectory and associated local plan evidence. To simply omit it for its safeguarded status at this stage is not logical. Whaddon is clearly intended by virtue its inclusion within the plan, and evidenced by paragraph 3.4.22 of the Draft Plan.</p> <p>Furthermore, the Whaddon site should remain in consideration for the allocation of housing for SDC's own requirement in the absence of confirmation from the SLP authorities.</p> <p>It should be the case that all planned growth for the plan period (including Whaddon) should be included in the housing trajectory.</p> | <p>therefore constitute 'planned growth' to be included in the transport modelling.</p> |
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| 73 | Copperfield L&P Limited on behalf of Colethrop Farm Limited | In respect of Hunts Grove, which is an allocation in the adopted Local Plan early delivery as part of the housing trajectory is noted. | Comment noted. |

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| | Site promoter of part PS30 Hunts Grove Extension | | |
| 74 | <p>Grass Roots Planning on behalf of Redrow Home Ltd</p> <p>Site promoter of alternative sites Land at Charfield Road, Kingswood and Land north of Hyde Lane, Whitminster</p> | The trajectory is unrealistic given it does not take into account the J12 and J14 constraints and the built out rates shown for Sharpness and Wisloe are not reflective of national averages and should be amended. | <p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios setting out projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>Matter 7 Housing Provision, including overall housing supply and the delivery trajectory over the plan period will be fully reviewed at a future hearing session.</p> <p>The developers of PS36 are confident on the predicted phased development of the Sharpness New Settlement and consider that the build-out rates provided for the development are realistic and deliverable.</p> |
| 075 | Sarah Jones | Reports EB134 and Appendix 1 demonstrate the plan is overly dependent upon delivery of strategic sites (A38/M5) with long build out rates. | The Local Plan Spatial strategy was considered at the Matter 2 Examination |

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| | | <p>The trajectory doesn't take into account the need for significant site infrastructure i.e. network rail bridges/mitigation, M5 footbridge, acoustic barriers, archaeological digs, high pressure gas-pipeline mitigation. The council should have removed PS37 from the next 5-year housing supply as confirmed by Inspectors during matter 5 hearings.</p> <p>Strategic sites impacting M5 Junction 13 which has capacity should be included as they do not affect 12/14.</p> | <p>hearing session 8/3/2023 and is not part of the current consultation.</p> <p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios setting out projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p> |
| | | <p>This table duplicates tab 1 in EB135, apart from missing 173 dwellings in PS37.</p> | <p>The delivery trajectory has been updated in the light of the pause to the Local Plan Examination, with PS37 now anticipated to deliver 1,327 dwellings within the plan period to 2040.</p> |
| | | <p>There are numerous barriers to delivery of those strategic sites set out in numerous Regulation 19 submissions and www.lichfields.uk/media/5638/how-does-your-garden-grow_a-stock-take-on-planning-for-the-governments-garden-communities-programme.pdf</p> | <p>Comment noted.</p> |

| Rep Number | Stakeholder Name Organisation OBO | Comments | SDC Response |
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| | | SoCG from NH (EB134) is not included in this consultation after many months, therefore is deemed not agreed. | SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors. |
| | | The trajectory is over unrealistic and the plan undeliverable. The examination and EB135 identified A38 strategic sites contribute significantly to the traffic load on M5 Junction 14 and should be included. | EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14. SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered. |
| | | New half-hourly trains from Gloucester to Bristol have not improved at Cam and Dursley due to line capacity (still only hourly), and the car park is full. The additional potential overflow car park is now allocated by the landowner for new dwellings (supported by recent planning application). Slimbridge Parish Council (statutory consultee) and Wisloe Action Group (Representing the parish residents) have undertaken significant technical analysis to respond to this consultation. I support their consultation responses. | Comment noted. This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14, PS36 New settlement at Sharpness and PS37 New settlement at Wisloe. |
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| Rep Number | Stakeholder Name Organisation OBO | Comments | SDC Response |
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| 077 | Sarah Davis Sarah Davis Glass | As clarified in the Reg19 submissions, the Examination Hearing and now EB135, most of these strategic sites contribute significantly to the traffic load on the M5 at junction 12 and 14. Including the strategic sites, affected by the J12 and J14 constraint, within the LP baseline housing trajectory makes the LP undeliverable and unsound. The focus on the A38 corridor for housing development is already causing additional congestion, as existing projects come to fruition. | EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14. SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered. |
| | | | |
| 079 | Cam Parish Council | <p>Reports EB134 and Appendix 1 show the draft Local Plan is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target.</p> <p>PS24 is still showing 300 homes at Sharpness Docks. This planning application was refused by SDC Development Control Committee due to it being unviable.</p> | <p>The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session on 8/3/2023 and is not part of the current consultation.</p> <p>To clarify, PS24 Cam north west (west of Draycott) Cam is allocated for 900 dwellings.</p> <p>PS34 Sharpness Docks is allocated for 300 dwellings.</p> <p>The site comprises strategic allocation SA5 in the adopted Local Plan 2015.</p> |

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| | | | <p>Planning permission was refused for 300 dwellings at PS34 Sharpness Docks against the officer recommendation.</p> <p>The promoter for PS34 has confirmed they will continue to progress with PS34 through the Local Plan and planning application process. Subject to planning permission being granted, the promoter now expects to start delivery of PS34 in the revised year 2028-29 in accordance with the updated trajectory.</p> |
| | | | |
| 080 | Eastington Parish Council | Any shortfall in developable housing stock in the draft plan, created by the non-existence of improvements to Junction12, can be made up by accelerating the housing on sites that are already within the draft plan such as Great Oldbury, Hunts Grove and Cam. | This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14, PS36 New settlement at Sharpness and PS37 New settlement at Wisloe. |
| | | | |
| 081 | Avison Young on behalf of The Tortworth Estate | We understand that the trajectory is indicating approximately 1000 units being delivered by 2032/33 within Sharpness Docks and Sharpness New Settlement. At this stage the Estate does not wish to challenge this assumption but clearly this | <p>Comments noted.</p> <p>The strategic modelling has fully and accurately assessed all the allocations within the Draft Stroud District Council Local Plan. All</p> |

| Rep Number | Stakeholder Name Organisation OBO | Comments | SDC Response |
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| | | <p>will be dependent on a solution for Junction 14 being agreed and delivered within this timescale. The same applies for the 400+ units expected to come forward within the same timescale at Wisloe. One of the Tortworth Estate's main concerns is the lack of strategic direction between the relevant parties with regards to consideration of other developments beyond the Sharpness proposals, including those developments coming forward beyond the Stroud District boundary.</p> | <p>emerging allocations within the Plan have been considered in the same way as the Sharpness proposals, particularly in terms of impact assessment on the highway network. It is therefore not clear what is meant by the suggestion that Sharpness has been considered differently to other sites within Stroud.</p> <p>With regards development sites coming forwards beyond the Stroud District boundary, SDC has engaged with the relevant Local Planning Authorities to understand the status of developments and the Development Plan. SGC has advised, accurately, that there has been insufficient certainty on emerging development sites within its Local Plan to incorporate specific sites within the modelling for the SDC Local Plan. This was the case at the commencement of Examination and remains the case with SGC's Local Plan not expecting to move to Reg 19 stage until early 2025. As per DfT methodology, housing and employment growth has therefore been accounted for by applying growth factors. It should be noted that SGC's Local Plan spatial strategy seeks to avoid a requirement for</p> |

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| | | | development to contribute to or deliver improvements at J14. |