

# Stroud Local Plan

## Examination in Public

**Matter 5** – Strategic Site Allocation Policy PS36 Sharpness New Settlement

Hearing Statement by Savills on behalf of L&Q Estates

February 2023



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

### **Strategic Site Allocation Policy PS36 Sharpness New Settlement**

#### **5.1 Does the proposed allocation meet the vision, spatial strategy and strategic objectives set out in the Plan? Does the policy ensure that these objectives will be met?**

a. We consider the new community allocation at Sharpness to be at odds with a number of the strategic objectives set out in the pre-submission draft Stroud Local Plan (SLP). Indeed, the development would not:

- result in an accessible community as sought by Strategic Objective 1. Even if all the policy requirements were delivered, and we have strong doubts that will be the case, the location of, and connectivity to, the new settlement is such that it will always be relatively isolated and have poor accessibility to the wide range of services and facilities needed to support a population of the scale envisaged.
- enable and facilitate healthy lifestyles for many of the new residents in accordance with Strategic Objective 1a. Indeed, for the reasons explained below, many future residents would need to drive a considerable distance to and from the new community for employment, with opportunities for active travel limited to internal trips made within the development. This is in stark contrast to other potential strategic development locations such as Whaddon where there is a wide range of employment opportunities within commuting distance by bicycle.
- support a pattern of development that prioritises the use of sustainable mode of travel as sought under Strategic Objective 5.

#### **5.3 Is the policy aim, of providing a new self-contained garden community settlement, viable and realistic? Has this been robustly demonstrated and is the development, as envisaged in the Plan, likely to be achieved during the plan period? [In response to this question we also pick up Question 5.4 matters related to Infrastructure Deliver]**

- a. For the reasons explained in paragraphs 2.27-2.54 of our representations to the SLP (May 2021) we consider it is extremely unlikely that a new community at Sharpness would be self-contained or indeed anywhere near achieving this core 'garden community' aspiration.
- b. Full self-containment is not a realistic objective for any development but to reasonably satisfy this objective the new settlement would need to provide sufficient employment, services and facilities to meet the needs of a significant proportion of future residents. Tackling each of these in turn:
- c. With regards **employment**, there is very little in the Local Plan evidence base which gives any confidence that the proposed 10ha of employment within the new community will be delivered. On the contrary, the evidence and the representations of other parties indicate that there is little prospect of the employment coming forward. Key to this conclusion are the following considerations:
  - The Employment Land Topic Paper (EB7) confirms at Table 1 that the employment land requirement to 2040 is 50.9ha - 60.3ha. The Plan however allocates 79ha of land for employment development. If the Employment Land Review (2021) is accurate in its forecast of need then the plan will allocate a surplus of 28.1ha – 18.7ha. In such circumstances it is likely that the better located employment allocations, such as Javelin Park with its good access to the strategic road network, will represent the first preference for development reducing demand at other locations such as Sharpness. Indeed, the ELR explicitly acknowledges that other sites are more attractive to the market than Sharpness. With over-provision elsewhere there is a major risk that the market demand will not exist to deliver the scale of employment envisaged, thus limiting the self-containment of the settlement.
  - A key component of the employment provision proposed at Sharpness is the 'Knowledge Park'. Significant concerns have been raised over the deliverability of the scheme<sup>1</sup>. Indeed, South Gloucestershire Council confirm at paragraph 5.14 of their response that they have their own expansion plans to provide 16ha of land at the existing GSTP site, which would meet the employment needs of this area for the next ten years.
  - The ELR concludes that it was not considered that higher order employment would be delivered in this location – rather B2/B8 units are more realistic, and even then, this would be delivered at a

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<sup>1</sup> See ELR (2021) Paragraph xxi, and 10.4; concerns raised by GFirst (paragraph 5.7) and South Gloucestershire Council (SGC).

relatively slow pace. The scale of employment likely to be generated by the proposal itself is therefore likely to be minimal, and based upon the Authority's evidence, in the latter stages of the local plan period. Furthermore, B2/B8 jobs make up only a proportion of the workforce and the jobs created will not therefore meet the full employment needs of the new community. Those with jobs in other sectors will need to travel some distance from the new community for employment. The distance to be travelled and the likely modal choices are covered later in this Statement.

- d. With regards **services and facilities**, Policy PS36, bullet point 8 requires the provision of *“a local centre, incorporating employment, local retail, surgery and other community uses to meet the needs of the development”* within and as part of the new community. The scale and mix of uses in this centre are not particularly well defined at this stage but we would expect it to include a convenience store similar to a Co-Op or a Sainsbury's Local, perhaps a few smaller commercial units and a cafe/bar/restaurant establishment. It would therefore meet local, day-to-day needs but residents are still likely to travel beyond the settlement for a larger / weekly shop and to meet many of their recreational / leisure needs (in addition to employment as described above).
- e. We would also expect the local centre to come on board only after a sufficient quantum of residential development has been delivered such that the units are commercially viable on an ongoing basis. The same is true of the primary and secondary schools, doctors' surgery etc and until such a time as there are sufficient residents to justify the construction of these facilities, pupils and patients will need to be transported to facilities elsewhere.
- f. Once complete, and assuming these services and facilities are commercially viable, there would be a degree of self-containment through the internalisation of trips, however, there will still be a significant number of residents who either need or chose to travel for a variety of purposes.
- g. For these reasons, and whilst not directly related to the question posed, it is not possible to decouple the degree of self-containment from **transport connectivity**; in other words what residents will do if they can't meet their needs on site. This is where we consider that there are very significant (and we would argue insurmountable) sustainability challenges facing the new community at Sharpness. In response to the various questions posed under the main heading of Question 4 we make the following comments.

- h. Despite the proposed movement infrastructure, future residents would inevitably be reliant upon the private car, even if a new train station and rapid bus services are provided. Indeed, we consider that there are no reasonably realistic mitigation strategies available – whether through financial contributions or the onsite delivery of infrastructure, which would make the location acceptable for large scale strategic growth.
- i. The Sustainable Transport Strategy (February 2021) (EB60a) confirms that Sharpness’s “*relative remoteness*” is an issue in sustainable travel terms. It identifies a single cycle link opportunity (a cycle route from Stroud to Sharpness) but concludes that the distance is a barrier. There are not opportunities therefore to support active travel from the site to service and facilities beyond the new settlement.
- j. Draft Policy 36 requires the delivery of “*direct and attractive express coach/bus services to key destinations, including Bristol and Gloucester, delivered at the early stage and designed to be more attractive than the use of private car for comparable trips*”. GCC’s modelling assumes 20% of trips would be made to central Bristol and central Gloucester via this intervention (Appendix E). This assumption appears to be arbitrary and optimistic given that the service is envisaged to start off as a single train per hour. Notwithstanding, according to the anticipated employment locations of residents in Sharpness (Local Plan Traffic Modelling, p194) this only accounts for 18% of trips from the development; thus 20% of 18% is 3.6% of overall trips.
- k. The alternative sustainable transport mode is bus travel, however the potential for buses to make a meaningful contribution to sustainable travel from the site appears to be very limited. The most significant constraint to the attractiveness of bus services in this location is geography, and the distance from the New Community to the key employment locations south on the A38/M5 at Bristol and north at Gloucester. Bristol City Centre is 22.8 miles away and the major employment at Aztec West is 15.1 miles to the south, while Waterwells Business Park and Gloucester City Centre are 14.3 miles and 18 miles to the north respectively. These distances are considerably greater than the average distance travelled by bus for commuting purposes reported in research for the Department of Transport as 5.3 miles, and significantly undermine the attractiveness of these services to future residents. It is for this reason that The Assessment of Strategic Development Opportunities Report (EB17a) concluded at paragraph 3.8 that:

*“Despite the potential for development at these locations [including Sharpness] to be supported by sufficient road capacity, unsurprisingly the accessibility results in relation to employment opportunities indicate that these locations have poor access to places of work by public transport (within 45 minutes) and by road (within 30 minutes) and therefore residential development here may contribute to unsustainable travel patterns.” [emphasis added]*

- l. Notwithstanding the potential value of this service, the cost of provision would be substantial – the distances involved, and the need to provide frequent services (alongside necessary improvements to the infrastructure to ensure that the speed of services is maximised as far as possible), comparative to the scale, and build out rates of, the development would render the service in need of significant upfront investment.
- m. Appendix B of Examination Document EB95f contains a high-level business case for the service produced by the proposed operator Zeelo. This business case indicates that there would be 2 no. 78 seater coaches from the new community running at 80% capacity and dropping off at five key employment locations followed by Bristol City Centre all within 35 minutes<sup>2</sup>. There are two timetabled departures at 6:10 and 8:10 to arrive at 7:30 and 8:50 respectively and an assumed cost of £8 for a return ticket. Even with these seemingly optimistic assumptions in a number of areas, the cost to the developer would be between £190-£270 per bus per day in subsidy. Increased inflationary pressure on public transport is significantly eroding their viability, and in this case further emphasising the likely probability that it never be sustained over any period of time.
- n. The reliance on an express bus service (whether referred to as a rapid transit, rapid link or various other iterations) for a new community has been discussed at multiple Local Plan Examinations – most notably, at Uttlesford and North Essex. It notably differs from the provision of enhanced bus services from a pre-existing location (ie an urban extension), and has a higher bar in demonstrating its

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<sup>2</sup> The latter is a particularly heroic assumption given the lack of bus priority along the majority of the route. By way of comparison, the current T1 bus service operated by First Group leaves Thornbury at 8:05 and is scheduled to arrive in Bristol City Centre at 8:52 – a journey of 47 minutes. Whilst it follows a different route, it similarly has a limited number of stops and Thornbury is considerably closer to Bristol than Sharpness. Current services from Berkley to Bristol Bus Station take approximately 2-2:30 hours according to Google Maps

deliverability. From these Examinations, it is clear that the proposal must be supported by clear evidence of:

- The scheme, including associated junction improvements, bus priority measures etc;
  - The cost – both inception, and subsidy;
  - The timing of the delivery, and if relevant the phasing of the services; and
  - The viability of the overall proposal – both in regard to during construction, and the long term viability of the continued bus service.
- o. We have reviewed the evidence published by both the Authority and the site promoter, and none of the documentation adequately addresses these considerations.
- p. There is no evidence to suggest that the delivery of a passenger rail facility in this location is possible (feasibly or viably); and further that these services would then be attractive to commuters.
- q. The Restoring Your Railway Bid published as part of the evidence base indicates that the funding application was for monies to draft a Strategic Business Case for a “relatively slow” pilot service – comprising an hourly service. The papers indicate that GCC have raised concerns that the delivery of the railway station would be too late to make any transformational change and associated modal shift, and that the services would need to be subsidised for some time; in addition, the Bid confirms that no engagement has taken place with the potential rail operators. The bid seeks to provide a direct service to Gloucester – which according to the Authority’s evidence, 9% of future residents would commute to from the new settlement. This is 9% travelling to Gloucester City as a whole, however those whose work may be within the substantial employment areas on the periphery of Gloucester are far more likely to use the car.
- r. The Addendum to the IDP (EB110) casts further doubt on the deliverability of the rail solution, stating at paragraph 3.6.1 that:

*“Concerns were raised in the Gloucestershire Rail Investment Strategy that whilst the reopening of the line could provide sustainable transport to Sharpness and enable significant growth in the area, analysis shows a very limited GVA impact for a very costly*

*new piece of infrastructure. This was also reflected in the comments from Network Rail and GCC Highways.”*

- s. Even within sustainable transport, there is a relative level of sustainability informed by the use of nature resource, i.e. construction materials and fuel. The relative sustainability of travel by bus over a shorter distance using largely existing infrastructure will be significantly better than far greater distances that require the construction of new infrastructure.
- t. Whilst we note that the traffic modelling accompanying the Plan does not assume the delivery of the rail link, this is not the case for the SA; which frequently references it when justifying the sustainability merits of the site. This inconsistency and the SAs disregard for the feasibility and value of the rail service undermines its robustness and reliability.
- u. Despite the proposals for new and enhanced rail and bus services, the potential for these to successfully divert trips away from the private car is severely restricted by the inherent unsustainability of the location. No matter what public transport services are put in place, the likelihood is that the vast majority of future residents would opt to use the private car to access services, facilities and employment opportunities adding to the *44% of annual carbon emissions in the District arising from transport*<sup>3</sup>. This proposal is therefore contrary to the key issues and priorities defined in the draft plan, and national policy.
- v. We consider that the proposed New Community at Sharpness fails the ‘justified’ and ‘consistent with national policy’ soundness tests and that this component of the Plan is both internally inconsistent and unsound as a consequence

### **Viability**

- w. The draft Plan includes a number of policy requirements, alongside aspirations set out (and to some extent depended upon to justify this location for growth) in the accompanying evidence base. We comment generally on the viability assessment accompanying the local plan below; however, raise a fundamental concern in regard to the viability of the New Community.
- x. In particular regard to Sharpness we have the following comments:

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<sup>3</sup> See paragraph 2.9.6 of the SLP



- The residential sales values have been revised between the publication of the 2020 Viability Study and the 2022 Refresh. Paragraphs 4.63-4.64 explain how the consultation responses have been taken into consideration and the proposed change to the sales values.
  - The 2020 Viability Study concluded that a value of £2,900 per sq.m. should be attributed to the open market houses at Sharpness. Based upon the housing price evidence published in the appendices it's very difficult to see how that figure has been derived.
  - Notwithstanding, what is more peculiar is that the assumed values for the Sharpness New Community have gone from being the second lowest (only above the development at Sharpness Docks)<sup>4</sup> to suddenly being the highest – overtaking all other strategic sites to an assumed sales value of £3,200 per sq.m<sup>5</sup>. There is no apparent rationale for this dramatic change. Even the (unjustified) grouping of Sharpness with the higher value areas of Cam, Stonehouse, Stroud and the Stroud Valleys doesn't explain why a sales value of £3,200 is deemed appropriate.
  - The final figure is subsequently uplifted by a further 15% to reflect a premium on new build homes to £3,680. We are somewhat baffled by the sales values assumed in the Viability Report. Not even the developer of the Sharpness scheme suggested a sales value near this and their estimate of £3,100 was predicated on the spurious assumption that values would be higher due to the proximity to Bristol.

Sales values have a very significant bearing upon the output of a viability appraisal. A relatively minor increase can prove the difference between a scheme being considered viable and not. We have little confidence in the credibility of this part of the evidence base.

- The Viability Assessment confirms the assumption of 100ha gross to 65ha net has been used. The draft Policy however requires at least 44.16ha of SANG (8ha per 1,000 people) in addition to a 35ha Nature Reserve adjacent to the Severn Estuary. That comes to 79.16ha of open space which still doesn't account for general green infrastructure requirements including formal open play provision, alongside the other usual reductions to the gross area for drainage etc. In essence, in order to deliver the new community, the developer will need to purchase a

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<sup>4</sup> See Table 4.15 of EB111

<sup>5</sup> See Table 4.17 of EB111

considerably greater area of land than the Viability Assessment assumes will be the case. This will inevitably have a negative impact on viability.

- The infrastructure requirements associated with Sharpness have been significantly underestimated. As per the above, there are considerable costs involved in the delivery and operation of an express bus service, delivery of a rail station and rail services, alongside the front loading of community infrastructure as a result of the lack of existing infrastructure available for use in the locality. The IDP Addendum (EB110) makes no assumptions on the costs of the bus mitigation and includes only £1.1m towards the Sharpness Branch Line and New Station; the costs of which are likely to be considerably higher if the new station is delivered at all.
- There are no land costs associated with the SANG and new Nature Reserve, alongside the construction and long-term maintenance and management costs which would go far above the general green infrastructure assumptions underpinning the viability assessment work.
- The proposal is predicated on achieving zero carbon development, delivering a MaaS system, the Transport Assessment includes a future water taxi, and contributions to the restoration of the Canal. These are all exceptional infrastructure costs, and yet the suggested infrastructure costs for this site are less than those for an urban extension to a City. We therefore assume that these have yet to be modelled.
- Garden Village – the Viability Assessment adds a Garden Village premium to the market values, and then an associated cost reduction of 2% to the site construction costs. Neither of these are justified or evidenced. Indeed, the justification for the cost reduction pertains to a 2012 commentary piece published by the TCPA; masterplanning practice and design principles have significantly advanced since 2012, and we would anticipate that there are now likely to be limited differences between a masterplan for a Garden Village, and a high quality masterplan for an large scale urban extension (with the dominance of cars and roads, which appears to be the justification for the 2012 conclusions, addressed in national policy and guidance on design). Indeed, the Vision Document from the promoter of the New Community contains masterplans which don't establish any different design principles than those for other large-scale sites; and indeed, the relative remoteness of the site is not anticipated to be conducive to lower car ownership levels.

- y. For the reasons set out above, there is no robust evidence to demonstrate that the Sharpness New Community is viable or deliverable and the allocation is not therefore justified or sound.

**5.6 The text accompanying the policy acknowledges the site is near to areas subject to flooding and that the disposal of surface water flooding will need careful consideration to ensure that neither the development or adjoining areas are at risk of flooding or exacerbating existing areas of flooding. How will this be achieved?**

- a. Please refer to paragraphs 2.61-2.65 of our representations to the SLP (May 2021).

**5.10 The text accompanying the policy lists a number of mitigation measures required due to the proximity of the site to the Severn Estuary SAC/SPA/Ramsar site. Taking account of these measures, will there be an effect on the developable area of the site that could impact on site densities or overall quantum of development?**

- a. Please refer to paragraphs 2.55-2.60 of our representations to the SLP (May 2021).

**Savills**

**01 February 2023**