

STROUD LOCAL PLAN REVIEW - EXAMINATION PAUSE TECHNICAL EVIDENCE CONSULTATION 2024

Representations on behalf of Cotswold Homes Ltd

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INTRODUCTION

- 1.1 This representation is made by RPS Consulting Services Ltd (“RPS”) on behalf of Cotswold Homes Ltd, who have land interests in Stroud and the neighbouring areas.
- 1.2 They have been prepared in response to additional information issued by Stroud District Council (“SDC”) as part of a six-week consultation between 09 September 2024 and 23 October 2024. The material issued by the Council seeks to respond to soundness concerns raised by the appointed Inspectors, following a prolonged pause of the Local Plan Examination.
- 1.3 The responses set out here address the three main concerns highlighted by the Inspectors, which are:
- 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.*
- 1.4 We also provide a response to the updated draft Housing Trajectory September 2024 (EB134) given the reliance SDC places on delivery of the new settlements as part of the overall strategy for Stroud up to 2040.

1 CAPACITY OF THE STRATEGIC ROAD NETWORK (SRN)

1.1 This response addresses issues relating to the capacity of the Strategic Road Network (“SRN”), specifically the capacity of junctions 12 and 14 of the M5 to accommodate proposed housing growth.

1.2 The response addresses the first matter of concern to the Local Plan Inspectors in this consultation:

The capacity of the Strategic Road Network (SRN), specifically the capacity of M5 Junctions 12 and 14 to accommodate proposed housing growth

1.3 On 5 February 2024, the Local Plan Inspectors [ID-015] agreed to pause the Stroud Local Plan examination to allow SDC to complete the workstreams set out in the Joint Action Plan (“JAP”) with National Highways (“NH”), Gloucestershire County Council (“GCC”) and South Gloucestershire Council (“SGC”) to address issues relating to the capacity of the SRN submitted to the Inspectors in November 2023.

1.4 Paragraph 4 of ID-015 summarises those elements of the work the Inspector’s require completion on, notably:

- The workstreams identified in the JAP should be completed, these should specifically includes:
 - agreed designs and costings for the M5 J12 and J14 improvements;
 - an agreed impact assessments and costings; third party land para 2.5.3 eb133c
 - an agreed cost apportionment exercise;
 - an agreed delivery programme to include the timings of when the junction improvement schemes will be needed; and
 - updated statements of common ground to reflect the work undertaken (as set out in the JAP).
- Any additional modelling requested or referred to in the exchange of letters since August 2023, and agreement between the relevant parties should be sought throughout the process.
- External sources of funding to ensure that the junction improvements can be delivered at the right time during the Plan period
- Additional Sustainability Appraisal (SA) and/or Habitats Regulations Assessment (HRA) work deemed necessary to support the work

1.5 We have reviewed the information issued by SDC in respect of the Inspector’s request and set out our responses below.

Agreed designs and costings for the M5 J12 and J14 improvements

Designs

1.6 Information regarding the designs for the potential improvement scheme for junction 12 is set out in section 3 of M5 Junction 12 Feasibility Study Stage 2: Optioneering Report Consultation Summary Report, September 2024 (EB133c) prepared by WSP for GCC. The design work for

potential improvements to M5 junction 14 is presented in section 2 of M5 Junction 14 Improvement Scheme Consultation Report, September 2024 prepared by AECOM (EB133a) for SDC.

- 1.7 We observe from the very outset that the various appraisal and modelling (we discuss this below) work undertaken for the two junctions has been undertaken separately. It would seem eminently more sensible (and thus sound) that the assessment work is carried out using an ‘integrated’ approach to the use of assumptions and other variables for the two junctions, to ensure these are applied on a consistent basis and thus ensuring a robust set of outputs are produced.
- 1.8 For the ‘dual’ approach to be deemed as robust, it is essential that the relationship between the two separate assessments is adequately explained and justified. Paragraph 1.1.3 of EB133a refers to the separate nature of the evidence gathering carried out, however it does not explain why this has been done. The use of separate assessment approach without clear justification must bring not question the soundness of the technical outputs at this stage.
- 1.9 In addition, whilst some design work has been undertaken, this does not appear to be the final ‘agreed’ position, as required by the Inspectors. Notably, paragraph 1.1.3 of M5 Junction 12 and 14 Improvement Schemes Funding Overview (EB133b) states:
- “Preliminary designs and associated costs for the improvements to the M5 junction have been prepared on behalf of Gloucestershire County Council (GCC) and SDC for J12 and J14 respectively. For J12 two options are recommended for further development – Option 2a as an improvement to the existing Dumbbell Roundabout arrangement, or Option 3a as a grade-separated roundabout. For J14 a grade, separated roundabout is proposed.”*
- 1.10 It would appear that progress on the technical work is at different stages for both junctions. This is perhaps symptomatic of the ‘disconnect’ between the two processes followed by SDC, but raises further questions marks regarding the soundness of the overall approach to the work.

Costings

- 1.11 Information on costings for the delivery of the improvement works is, again, presented separately for each junction.
- 1.12 Table 3.2 of EB133c sets out the ‘High Level Cost Estimate’ for the various options for improvement work at Junction 12. Table 3.1 of EB133a provides a summary of ‘Order of Cost Estimate’ (OCE) for Junction 14. The estimates are also summarised in Table 2.1 of EB133b. We have reviewed the figures and have a number of concerns, highlighted below.
- 1.13 Firstly, the scheme cost put forward for Junction 14 is c.£100-120m. This is supported by a schedule of inputs explained in some detail in M5 J14 Order of Cost Estimate 06 September 2024 Version 2.00 (EB133a, Appendix G). A £20m range on a project estimates of up to £120m is broadly reasonable.
- 1.14 However, the costs for Junction 12 improvement works is estimated to be between £140 to £210m, a range of £70m (or a 25% to 50% variance) against the estimated costs. This is a significant variation in the predicted cost, which reflects the fact that the technical work for Junction

12 is still at the 'preliminary' stage and does not relate to a final, agreed scheme (as requested by the Inspectors).

- 1.15 Secondly, there are differences in the variables that have been used to inform the cost estimates between the two junctions. Notably, whilst the estimates for Junction 12 include an allowance for inflation (ranging between £8.2m to £73.2m), the estimates for Junction 14 do not. Without a consistent approach, it is very difficult to compare and contrast the robustness of the inputs included in the estimates for the two junctions and to assess whether one, or both, are reasonable (and thus soundly-based). Most significantly, it is clear that the full costs of the improvement works to junction 14 have not been defined, contrary to the Inspector's request.
- 1.16 It is unclear why a different approach to accounting for inflation has been applied. We note that the cost information presented in Appendix G of EB133a, for junction 14, which states:
- "As no time frame or programme has been agreed inflation has been excluded."*
- 1.17 Apart from the fact that the costings are inconsistent on how inflation has been accounted for, there is a clear admission that 'no time frame or programme has been agreed' for the improvement works required to junction 14. This has wider implications for the soundness of the Plan, as reflected in the options report for junction 12, notably:
- "Uncertainty over how the site allocations within the Local Plan can come forward in full without the junction improvements."* (EB133B, para 1.1.2)
- 1.18 Taken together, we have serious reservations regarding the decision to carry out the technical assessment work independently for both junctions, rather assessing the impacts and thus the scale of improvement work required in an integrated manner, given the junctions are located in the same part of the M5 network. Furthermore, it is clear that design work is still at the 'options' stage and does not represent an 'agreed' position for consideration at the next stage of the Local Plan examination, contrary to the Inspector's clear request. A key implication of this, especially for the projected improvements to Junction 12, is that there can be no confidence that the estimated costs for the necessary work actually reflect the scale of work required to accommodate the traffic growth at the M5 junctions until such time as the final, agreed work are defined. The evidence presented on design and costings does not adequately address the Inspector's request for further information, and so raises significant concerns regarding the soundness of the Plan on deliverability grounds.

An agreed cost apportionment exercise and external sources of funding

- 1.19 Information on apportionment of funding for the improvement works at Junction 12 and 14 is set out in section 3 of the funding overview report (EB133B). In summary, the report currently envisages that the improvement schemes would be the subject of a 'funding approach' to Central Government, and that circa 15% of the funding would be generated from via local development contributions (EB133B, para 5.1.2). 'Local development contributions' equates to securing funds

through developer contributions from proposals brought forward locally (either within, or from neighbouring areas outside, Stroud District).

1.20 The 'local contribution' of 15% is noted. Paragraph 5.2.2 of EB133B says that:

“For the purposes of viability testing this has been assumed to originate entirely from within SDC, removing reliance on funding from other Local Authority areas, although in practice there will likely be a contribution from development in wider local authority areas.”

1.21 However, it remains unclear what viability evidence (if any) has been prepared at this stage in order to justify that this proportionate contribution is viable, and thus deliverable, for development proposals brought forward in Stroud, or from sites outside the district. Robust viability evidence is a pre-requisite in order to demonstrate the Plan is deliverable, in accordance with national policy.

1.22 Furthermore, the requirement for 15% of funding from development proposals in the Stroud means that the remaining 85% of the funding for the improvement works will need to be secured from Central Government (EB133B, para 5.2.3). To support this approach, the funding overview report seeks to establish a 'strategic case' for funding from the national purse. However, the report does not identify any specific funding pots, or other national or sub-regional funding streams that could be accessed in order to address the 85% funding 'gap' in the Plan. Without a clear bidding strategy in place that has reasonable prospects of securing the necessary funding for the junction improvement works, it is not possible to define an 'agreed apportionment' of costs required to fund the transport infrastructure need to deliver the Plan.

1.23 Taken together, we do not consider the apportionment of funding has been adequately addressed on the basis of the evidence provided, and so the Plan strategy is not deliverable.

An agreed delivery programme

1.24 As explained above, the Council's own evidence clearly states that there is no agreed time frame or programme for the improvement work need at Junction 14 of the M5 (EB133a, Appendix G). This is also the case for Junction 12, but it is not expressly stated, given the stage the process has reached. This is evident because the Council also admits that the process of defining the necessary improvement works is still at the 'preliminary' options stage, and it is also unclear how the schemes are to be funded.

1.25 In summation, without an agreed delivery timetable this further undermines the deliverability of the Plan as submitted. There are, however, wider implications for housing land supply and the housing trajectory of the Plan, given that the junction improvements are required before the 3,727 dwellings proposed at the two strategic site allocations of Sharpness (PS36) and Wisloe (PS37) can be delivered (EB134, Draft Plan Trajectory 2024).

Updated statements of common ground

1.26 As far we can gather from the information presented, no updated statements of common ground have been issued for consultation as part of this consultation exercise. This points to a further lack

of any clear 'outcome' from the technical work carried out as requested by the Inspectors, and as required by national policy on effective cooperation in plan-making.

Additional Sustainability Appraisal and/or Habitats Regulations Assessment

- 1.27 The technical information presented as part of this additional consultation stage does not include any further Sustainability Appraisal ("SA") and / or Habitats Regulations Assessment ("HRA") work. Clearly, as part of the soundness test, the Plan will need to be based on an 'appropriate strategy' (justified), but should also "...be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements.." in accordance with national policy (NPPF 2021, para 32).
- 1.28 The Council has not expressly stated why and SA/HRA is not necessary at this stage. The Council should clarify their position.

2 STRATEGIC SITE ALLOCATION PS36 SHARPNESS NEW SETTLEMENT

2.1 This response addresses the second matter of concern to the Local Plan Inspectors in this consultation:

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

Proposed passenger train service

2.2 In their letter to the Council dated 4 August 2023 (ID-010), the Local Plan Inspectors highlighted 'serious' concerns regarding the viability and deliverability of rail schemes that are required to ensure that the Sharpness new settlement promotes the prioritisation and accessibility of transport by means other than the private car, thus ensuring the new settlement is sustainable in transport terms.

2.3 Paragraph 20 of the 4 August letter summarises their concerns clearly, which states:

"...the cost of providing a passenger train service has not been audited or agreed with Network Rail or the relevant Train Operating Company (TOC). The costs therefore may well be subject to change. In response to suggestions that the scheme would not meet the criteria to apply for external funding, the developer has said that it would be self-funded by the development. However, this leaves limited flexibility should costs rise as is often the case with infrastructure projects. Furthermore, the developer advised that any subsidy for the railway service would end after 3 years at which point it would be expected to be self-funding. We are not convinced that this would allow a sufficient timeframe for a new service to be established. In addition, the train service would call at Gloucester and would not extend to Bristol, which is an important economic centre. Given that the service would need the agreement of Network Rail and the TOC we are also concerned about the lack of recent engagement. We therefore have concerns that the train service is not viable or deliverable whether it is self-funded or not."

2.4 The Inspectors clearly recognise and acknowledge the implications of these issues, stating in paragraph 22 of the letter:

"Should both the train service and the MaaS scheme not be delivered as proposed within the Plan then what would remain would be a large new settlement where the use of the private car for external journeys would likely become the default option for the majority of residents. This outcome would fundamentally conflict with the Plan's overall vision, its spatial strategy and the garden city ethos for new settlements." (RPS emphasis)

2.5 In this context, it is absolutely essential that these issues are properly addressed in order the Local Plan to be found sound.

- 2.6 In response, Stantec UK Ltd (Stantec) were commissioned by Sharpness Development LLP, the prospective developer, to prepare a ‘Strategic Outline Case’ (SOC). The SOC is included in document **EB136, Appendix 3**. The SOC was prepared to consider the reintroduction of passenger services on the Sharpness branch line and for a new station serving the Sharpness Vale development and other growth nearby (EB136, para 1.1.1). The focus of the SOC is for a new station alongside the reintroduction of passenger services on the Sharpness branch line. If realised, it is claimed the station would provide public transport connectivity for the proposed Sharpness Vale settlement (EB136, para 1.1.3).
- 2.7 Nevertheless, at the outset the SOC makes that its purpose is only to “...*determine what the most appropriate potential solutions are...*” (EB136, para 1.1.4) which means that the SOC does not identify a ‘preferred option at this stage’ (EB136, para 1.1.2). This immediately does not instil any confidence that the additional evidence has addressed the Inspector’s concerns. This becomes clear, as explained below.
- 2.8 From the information presented, the SOC recognises that Sharpness Vale (the wider locality including the new settlement site) is not currently connected to the wider rail network; according to the SOC, the nearest existing station is ‘Cam & Dursley’ station, which is 7 miles east of the proposed development (EB136, para 2.2.4) is not ideally situated particularly for travel onwards to Bristol as passengers from Sharpness Vale would face a ‘disjointed rail journey’ to reach onward destinations (EB136, para 7.1.3). This means that a new station at Sharpness new settlement will be essential in order to secure the necessary connects to the wider rail network, and thus deliver the sustainability credentials required to justify a new settlement in this location.
- 2.9 However, for the ‘best performing rail-based options’ the operating costs for the new services have been estimated to be ‘high’; for example, the additional cost of providing a southern chord to serve Bristol, would increase construction cost from £6.1m without the chord, to £51.1m with the chord (EB136, para 7.1.4-7.1.6). Nowhere in the SOC, or other evidence, are any sources of funding identified to meet such costs. The SOC then says:
- “When comparing operating costs and revenue, both options for reopening the branch line from Sharpness to the wider network would generate a large loss, due to the high operating costs and need for the additional units; the deficit would be between £22m and £90m”* (EB136, para 7.1.7).
- 2.10 The SOC concludes that:
- “...due to the high operating costs, the economic assessment indicated that the generated revenues were unlikely to offset the scheme costs and operating costs. For options A and B [a new station at Sharpness] overall, it is concluded that these rail options are predicted to offer Poor Value for Money if delivered.”* (EB136, para 7.1.9)
- 2.11 On this basis, it is clear the evidence that a new station at Sharpness is currently not viable and so not deliverable in isolation.

- 2.12 Nonetheless, the SOC does suggest that “...*integrating the Sharpness branch line into wider rail service patterns...*” could remove the “*burden of operating costs*” solely on this particular scheme (EB136, para 7.1.10). However, this approach would only be deliverable “...*if and when future aspirations for increasing services between Bristol and Gloucester come to fruition...*”.
- 2.13 In this context, the SOC recognises that “...*passenger rail options for the Sharpness branch line are likely to be a long-term prospect...*” (EB136, para 7.2.1). Notably, the SOC also recognises that:
- “ The reopening of the branch line needs to be considered within the wider strategic context and continued dialogue with key stakeholders especially with Network Rail, the train operating companies, Gloucestershire County Council and West of England Combined Authority (who are developing MetroWest proposal) regarding mid to long term plans for rail on the Bristol to Birmingham Corridor and how the Sharpness branch line and its potential opening to passenger services in future may fit or could be included into future plans, is important. The significant economic and housing growth planned for the area is likely to intensify demand for non-car travel and therefore a joined-up approach with other key stakeholders such as Western Gateway is a logical next step to include the role of rail in meeting the additional demand.”* (EB136, para 7.2.2)
- 2.14 From the evidence presented, it is patently obvious that the provision of new passenger rail service to meet the travel needs of new residents, visitors, and businesses at Sharpness new settlement remains an ‘aspiration’ and where there are no clear, agreed proposals for how the required rail services are to be provided, no agreement on future costs, and no agreement on where the funding will be secured from to deliver such services in practice, or the expected timeframe in which such services are to be provided.
- 2.15 On this basis, the evidence presented as part of this consultation does not address the Inspector’s serious concerns. We can only conclude that the proposed passenger train service at Strategic Site Allocation PS36 Sharpness New settlement are not viable or deliverable.

Mobility as a Service (MaaS)

- 2.16 In their letter to SDC, dated 04 August 2023 (ID-010), the Local Plan Inspectors also highlighted their concerns regarding the viability and deliverability of MaaS scheme which the Inspectors recognise (and we are in agreement) as being an important part of ensuring the Sharpness new settlement can be accessed sustainably by all travel modes other than private vehicles.
- 2.17 Paragraph 21 of the 04 August letter summarises their concerns clearly, which states:
- “Whilst additional evidence has been submitted regarding the MaaS scheme, this does not provide indicative costs for implementing such a scheme at Sharpness. We therefore have concerns regarding its likely cost, how it would be funded and whether it would be viable. In addition, we are still not clear how a scheme like this has been successfully implemented in*

the context of a new settlement rather than an urban area where existing public transport options already exist and are well-established.”

- 2.18 In response, information has been issued in relation to updated technical note on MaaS schemes (EB136, Appendix 4) and an update to the Sharpness Vale DRT- Coach Services (EB136, Appendix 5), which are an important element of the MaaS proposals. We have reviewed this information has set out our responses below.

MaaS

- 2.19 The research note on MaaS services has been prepared by Stantec on behalf of Sharpness Development LLP, who are promoting the Sharpness new settlement proposals. It is claimed that the information in the note is “...*that which is most useful to the implementation of MaaS in the context Sharpness Vale...*” (EB136, Appendix 4, para 1.6). In conclusion, it is claimed that:

“This Technical Note has addressed concerns outlined by the Planning Inspector regarding the viability of a MaaS scheme in the rural context of Sharpness.” (EB136, Appendix 4, para 10.1)

- 2.20 If this were the case, then the note has clarified the ‘likely cost, how the MaaS scheme would be funded and whether it would be viable’, and also provide some clarity on ‘how a scheme like this has been successfully implemented in the context of a new settlement’. These factors point directly to the concerns raised by the Inspectors in their August 2023 letter issued to SDC over a year ago now. However, the findings from the research appears to contradict this statement.

- 2.21 Firstly, the note claims that evidence has been provided of examples of viable and successful MaaS schemes that operate in a variety of contexts, including rural, and that consequently these examples show that MaaS can not only be implemented successfully (EB136, App 4, para 10.1). However, none of the ‘examples’ presented actually relate to new settlement(s) in the UK context (or elsewhere).

- 2.22 Secondly, the note makes it very clear that it is not possible to provide any likely costings for a MaaS scheme to support the Sharpness new settlement, and thus no funding sources have been identified to finance the scheme. As the note states:

“During the development of Sharpness Vale the Sharpness Development LLP will engaged with MaaS providers to develop a cost model for a solution that meets the local requirements.”

- 2.23 The lack of any detail on future costs and likely funding sources even now does not address the concerns raised by the Inspectors. Consequently, the additional information on the MaaS proposals provides no confidence that a viable and deliverable solution for the MaaS scheme at Sharpness new settlement is even possible based on current information.

- 2.24 The justification given for the lack of any meaningful information on costings and funding arrangements is underscored by the final paragraph of the commentary in the note, which states:

“It is important to note that the development of Sharpness Vale is by no means contingent on the provision of a MaaS solution as all proposed transport systems will be implemented

regardless and MaaS is primarily intended to provide a modern enhancement to user experience and a means to promote adoption of sustainable travel behaviours. MaaS, forming part of the transport offerings at Sharpness Vale, will enable the use of and integrate all transport options provided as part of the development to enable as seamless as possible access to sustainable travel options for future residents, it is however not a requirement of multimodal transport.

- 2.25 Such a conclusion appears to challenge the very basis for the Inspector’s concerns, rather than actually address the concerns as they have been requested to. More importantly, the lack of adequate evidence on the viability and deliverability of the MaaS scheme fundamentally conflicts with the Plan’s overall vision, its spatial strategy and the garden city ethos for a new settlement at Sharpness, a point already highlighted by the Inspectors and which we agree with.
- 2.26 Consequently, this must raise serious concerns regarding the soundness of the overall strategy in the Plan.

Coach services (DRT)

- 2.27 The lack of sufficient clarity on the evidence required to demonstrate the overall sustainability of the new settlement at Sharpness is reinforced by the current position on the proposed coach services (via Demand Responsive Transit), which is acknowledged by the promoters and SDC being ‘an element’ of the wider MaaS scheme for the new settlement.
- 2.28 The additional information relating the DRT /coach services is set out in update note also prepared by Stantec on behalf of Sharpness Development LLP (EB136, Appendix 5). Paragraph 1.4 of the note states:
- “This note sets out detail regarding the operational and cost aspects associated with this service as the development is built out as well as changes to the planned services that are required as a result of other parallel processes and studies.”*
- 2.29 According to the note, the intention is that the new service would provide express coach services between the site, Gloucester and Bristol before passenger rail services can be viably implemented (paragraph 1.3). This underlies the fact that the new passenger rail services will not be capable of being implemented in the short-term (matters we have discussed elsewhere in our response) and therefore alternative solutions are needed to ‘plug the gap’ in sustainable travel options for the new residents at Sharpness.
- 2.30 However, a review of the additional information clearly shows that no detail has been provided concerning the likely costs of implementing a coach service connecting journeys between the site, Gloucester and Bristol (or any other location). The main reason for this, the note states at paragraph 5.2, is because:

“...the outcome of both the recent SOC [Strategic Outline Case] for Sharpness Passenger Rail Services and the M5 junction 14 modelling work and associated interim highway

mitigation scheme will affect the operational characteristics and costing of planned coach services from the site towards both Bristol and Gloucester.”

2.31 This is confirmed at paragraph 5.3, which states:

“It has not been possible to develop a refined model for the proposed express coach services until these processes are concluded and the overall proposed transport systems beyond the site and the timing thereof is more certain.”

2.32 Consequently, rather than providing greater clarity and certainty on the proposals to support sustainable transport solutions at Sharpness, the additional information issued for this consultation has actually created the exact opposite situation. Paragraph 5.5 of the note refers to ‘engagements’ with service providers who have operated schemes elsewhere in the country (Via) and the potential to issue further ‘supplementary evidence as soon as it is available’, but no dates are provided for when this evidence would be made available.

2.33 Taken together, it remains the case that a viable and deliverable solution for the MaaS and coach services (as an interim solution to the lack of a viable passenger rail service) has not been devised at this stage, let alone agreed by all the relevant stakeholders. This is despite the specific request for clarity from the Local Plan Inspectors on these matters. This clearly undermines the soundness of the Plan strategy for Sharpness new settlement on viability and deliverability grounds, but also on wider sustainability grounds.

3 STRATEGIC SITE ALLOCATION PS37 WISLOE NEW SETTLEMENT

3.1 This response addresses the third matter of concern to the Local Plan Inspectors in this consultation:

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.

Pedestrian and cycle bridge

3.2 In their letter to SDC, dated 4 August 2023 (ID-010), the Local Plan Inspectors highlighted their concerns with the provision of a pedestrian and cycle bridge over the M5. Paragraphs 3-4 of their letter details their concerns clearly, which states:

“Our concerns relate to the provision of the pedestrian and cycle bridge over the motorway. As a critical piece of infrastructure, we would require the evidence to clearly demonstrate that this is both viable and deliverable. During the hearing session it became apparent that the projected costs for this piece of infrastructure and timescales for delivery had not been recently agreed with National Highways. We therefore have concerns that the costs for implementing this scheme may be higher than anticipated which could affect the overall viability of the site.

The evidence shows that the provision of this bridge is essential to ensure there is a sustainable pedestrian and cycle route to and from the nearby railway station and to other local services and facilities. Without it, the sustainable accessibility of this new settlement is of concern. However, we feel that additional evidence on this issue, could potentially alleviate our concerns. Such evidence would need to demonstrate outcomes from further discussions with National Highways setting out agreed project costs and timescales and provide updated viability evidence for the site. We recognise that this would presumably take some time to achieve...”

3.3 In response, SDC has issued a document titled ‘*Land at Wisloe: M5 Pedestrian & Cycle Bridge – August 2024 R2*’ (EB137). This includes information pertaining to the viability and deliverability of the scheme, and copies of correspondence with NH, and cost information for the scheme, provided by Stantec and Ward Williams Associates LLP acting on behalf GCC and The Ernest Cook Trust (The ECT). We have reviewed the additional information in EB137 and wish to make the following observations.

3.4 Firstly, whilst some of information presented in EB137 relates to correspondence received during 2024 (Appendix C and E) relates to 2024, both the Viability & Deliverability Statement (Appendix A) and the cost summary for the pedestrian bridge (Appendix D) are dated June 2023. Both these pieces of key evidence have, in effect, not been updated since the Local Plan Inspectors agreed to a pause in the examination in February 2024. As a consequence, the data on costings and values that underpin the claim that the provision of the bridge remains viable is not based on up to date

cost assumptions for the construction work. We (and we would surmise the Inspectors also) would have expected to see a revised development appraisal and costing exercise as part of the consultation issued now in response to the Inspector's specific request in ID-010. SDC and its consultants clearly have not done as the Inspectors have requested. In light of this, the assertion made in EB137 (at paragraph 3.3) that the costs of the bridge remains unchanged at c. **£3.77m** is questionable.

- 3.5 Secondly, the Inspectors have requested that information is prepared and issued setting out an 'agreed project costs and timescales' with National Highways for the new bridge. Appendix E of EB137 is relied upon as evidence that this request has been addressed. However, whilst NH is not objecting to the costings provided to them in February 2024 (Appendix C), they merely say in their email response that the updated costs (which are unchanged) are '*broadly in line with what National Highways would expect the costs to be on a scheme of this nature*'. This, in our view, is what it is; a broad agreement in 'principle'; it is not the same as an agreed position between NH and the developers of Wisloe on the project costs and timetable for the bridge as requested by the Inspectors.
- 3.6 This is important because, thirdly, the cost plan summary (EB137, Appendix D, Table 3.5) issued by WWA, dated 1Q 2024, sets out a total cost of **£6.285m** for the new bridge. This cost is not shown in the development appraisal within the June 2023 Viability & Deliverability Statement (which has not changed) is not referred to anywhere else in the additional consultation material issued now. The figures in the cost plan is c. **£2.515m higher** than the £3.77m figure in the development appraisal. It is not clear how or whether the difference is accounted for elsewhere in the viability evidence. If it is not, then there would appear to be an 'unaccounted shortfall' of £2.515m in the development appraisal for Wisloe that needs to be met elsewhere.
- 3.7 Taken together, whilst some additional information on viability and deliverability matters regarding the new bridge has been presented here, in our view it falls short of the additional information the Inspectors have requested to enable them to determine whether the new bridge proposals in support of Wisloe new settlement are viable and deliverable, and thus soundly-based.

4 IMPLICATIONS FOR HOUSING DELIVERY IN STROUD

- 4.1 As explained in our response the points raised by the Local Plan Inspectors in August 2023, RPS has identified a number of significant issues with the future planning and implementation of the transport improvements required to support the plan strategy and delivery of the strategic site allocations (PS36 Sharpness and PS37 Wisloe new settlements in particular).
- 4.2 This is in terms of both the overall sustainability of the strategy and reliance on these new settlements to meet the housing of Stroud, as well as the viability and deliverability issues that remain largely unresolved. Our concerns are drawn largely from the additional information issued by SDC as part of this consultation.
- 4.3 In summary, whilst some work has progressed (for example, modelling of impacts on the junctions) it remains the case that there are no agreed plans, costings, funding arrangements, or delivery timetable to demonstrate how and when the highway improvement works to the two M5 junctions (12 and 14) will be delivered. We fully appreciate the Inspector's concerns in this regard because without necessary works (in particular, junction 14) the housing requirement (12,600 dwellings, 2020-2040) will not be met through the draft plan allocations strategy. This is self-evident from the documents issued for consultation.
- 4.4 SDC has issued an updated Draft Plan Housing Trajectory September 2024 for the plan period 2020-2040 (EB134). The updated trajectory identifies a total (unconstrained) supply of 15,164 dwellings, a 20% overage on the minimum housing requirement (12,600) for the same period. This also assumes a five-year supply of 4,470 dwellings for the period 2025-2030 (on adoption). Achieving the trajectory is predicated on the implementation of the necessary improvement works being secured to junction 12 and 14.
- 4.5 SDC say (in EB134) that the updated trajectory has been used to inform the housing delivery scenarios impacting M5 Junction 12 and Junction 14 (which are set out in EB135). The scenario analysis is summarised in EB135, titled 'Housing Trajectory Summary'. The table below summarises the expected delivery against each scenario over the plan period (2020-2040) and the projected five-year supply on adoption (2025-2030). The figures are taken from the numbers in EB135 (we have added in the five-year requirement assumption, based on the annual average of 630 dpa, plus 5% buffer, in accordance with NPPF 2021).

Table 4-1 SLP – Housing trajectory 'scenarios' (EB135)

Scenario	Plan period supply	% of Housing requirement	Five-year supply	Five-year requirement	Supply (in years)
Unconstrained 2020 - 2040	15,164	120	4,470	3,307	6.76
Scenario excludes sites with an impact at J12 2020 - 2040	13,054	104	3,960	3,307	5.99
Scenario excludes sites with an impact at J14 2020 - 2040	10,042	80	3,380	3,307	5.11
Scenario excludes sites with an impact at J12 and J14 2020 - 2040	7,932	63	2,870	3,307	4.34

Scenario	Plan period supply	% of Housing requirement	Five-year supply	Five-year requirement	Supply (in years)
Scenario assumes Sharpness Interim scheme can be delivered up to 1,000 units at Sharpness. All J12 impact sites are excluded 2020 – 2040	8,967	71	3,025	3,307	4.57
Scenario assumes Sharpness Interim scheme can be delivered up to 1,000 units at Sharpness. However, trajectory accounts for the equivalent impact on M5 J14 SB on-slip (AM) coming on a first come, first served basis from a range of sites. All J12 impact sites are excluded 2020 - 2040	9,330	74	3,767	3,307	5.70

- 4.6 What the table above shows is that the only viable and deliverable scenarios that will achieve the minimum housing requirements in Stroud are those that address the highway impacts on junction 14 (the impacts on Junction 12 are assumed to be less significant in overall terms). Where the impacts on Junction 14 cannot be addressed in full, the maximum number of homes likely to be achievable under the current draft strategy is 10,042 dwellings. This is significantly less than the minimum requirement of 12,600 dwellings up to 2040. In terms of five-year land supply, the effect of not addressing the impacts on Junction 14 also indicate that the position on adoption will be very marginal, or may even below the five-year minimum threshold, contrary to national policy. As we have set out in our responses, there is little certainty in the evidence presented here to demonstrate that the improvements works needed at Junction 14 will be secured in order to facilitate the release of the site allocations that are depended on them.
- 4.7 Furthermore, SDC point to two ‘interim’ schemes put forward by the site promoters of Sharpness that suggests that a quantum of growth might be achievable at Sharpness new settlement and the other sites linked to junction 14. Both of these scenarios would still fall significantly short of the minimum number of homes required over the plan period, but it might indicate a five-year supply is achievable on adoption (defined in EB137 as ‘Option B’). However, the evidence presented on these interim proposals (EB136, Appendix 1) does not refer to any plans or programme for delivery agreed between National Highways ad SDC or the site promoters, instead the document refers to further work to be ‘*resubmitted to National Highways for consideration*’ which is expected to be completed ‘*during September 2024*’ (EB136, appendix 6, para 4.5). Again, insufficient evidence has been presented which demonstrates these interims schemes are viable and deliverable.
- 4.8 In light of this, we contend that the plan period trajectory and five-year supply on adoption are not viable and deliverable based on the additional information presented as part of this consultation. The soundness of the plan is very highly questionable without main modifications. This should include additional / or alternative site allocations that are capable of being brought forward without significant impact on the strategic highway network.

5 CONCLUDING REMARKS

- 5.1 Based on the issues highlighted in our responses, it is clear that the insufficient information has been presented by the Council to address the soundness concerns identified by the Local Plan Inspectors in their August 2023 letter.
- 5.2 As explained in this response, we do not consider the proposed new settlement at Sharpness is either viable or deliverable based on the additional information presented for this consultation, given the lack of certainty provided regarding the critical transport infrastructure works required to the M5. Furthermore, the provision of a new passenger rail service between Sharpness and the wider rail network remains an ‘aspiration’ rather a realistic prospect of delivery at this time, and the lack of any credible public transport alternative solution, brings into question the overall sustainability credentials of a new settlement in this location.
- 5.3 Similarly, we have reservations that the new pedestrian and cycle bridge at Wisloe new settlement is viable and deliverable based on the additional information provided. This in particular relates the costings information provided for the new bridge. Through we accept the issues we have identified could be addressed through further submissions to the examination.
- 5.4 Nonetheless, the lack of clarity on the agreed way forward in delivering the necessary highway and public transport infrastructure continues to raise significant soundness concerns with the Plan and which remain unresolved. In this context, we respectfully request the Local Plan Inspectors should consider the recommendation on plan examinations issued by Minister of State Matthew Pennycook MP in his letter to PINS dated 30 July 2024. In that letter, he stated that:
- “Pragmatism should be used only where it is likely a plan is capable of being found sound with limited additional work to address soundness issues. Any pauses to undertake additional work should usually take no more than six months overall. Pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall...This new approach will apply to all plans with immediate effect. Existing pauses already agreed by an Inspector should remain in place unless the Inspector considers there is insufficient progress being made.” (RPS emphasis)*
- 5.5 Should the Inspectors consider that fundamental issues remain with the soundness of the plan, it is imperative that alternative sites that can deliver homes in the short-term to assist with SDCs housing trajectory are considered. Cotswold Homes have control of sites in Coaley and Leonard Stanley that have no underlying constraints and are deliverable in the short term with development able to commence within one year of securing planning permission.