

STROUD DISTRICT LOCAL PLAN REVIEW INSPECTORS MATTERS, ISSUES AND QUESTIONS

Matter 11 Statement
Ecotricity Group Ltd

Matter 11 Infrastructure Provision and Viability

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Issue 11 – Does the Plan set out a positively prepared strategy for infrastructure provision to meet the Plan’s development strategy and is this justified, effective and consistent with national policy? Are the policies relating to infrastructure sound? Is infrastructure provision viable?

Matter 11a Infrastructure – general questions

Infrastructure and Developer Contributions – Core Policy CP6

1. The policy seeks ‘to ensure that infrastructure will be in place at the right time to meet the needs of the District and to support the development strategy.’

- a) The policy identifies the Council’s broad intentions in achieving infrastructure provision, rather than setting out clear development requirements. What infrastructure is actually sought from development proposals or is this appropriately set out within other Plan policies including the site allocations? Can the Council clarify the purpose of the policy and how a decision-maker would use it when determining future proposals?**

11.1 It is assumed that this policy is to be read alongside the more detailed Site Allocations Policies. Some of the Site Allocation Policies, including PS20, set out clearly the required infrastructure improvements, but other policies do not explicitly set this out. In terms of the required improvements, it is important that these are proportionate and shared between all benefiting developments.

11.2 Paragraph 2.9.30 recognises that the supporting IDP will need to be reviewed and updated when circumstances change, such as National Policy or highway network flows (slower than projected growth). For PS20, delivering modal shift through the proposed improvements outlined within the policy, as well as the potential reopening of the Stonehouse Bristol Road Station, will have the effect of removing or reducing the required infrastructure upgrades to the A419.

- b) As regards the reference to developer contributions, we are unclear as to exactly what the policy is seeking from development proposals? What contributions are actually sought and are these viable? Can the Council clarify please?**

11.3 The Policy states that *'where implementation of a development would create a need to provide additional or improved infrastructure and amenities, would have an impact on the existing standard of infrastructure provided, or would exacerbate an existing deficiency in their provision, the developer will be expected to make up that provision for those local communities affected.'* This suggests that developers will be expected to make up/improve existing deficiencies in Infrastructure. Whether this is the intention of the policy, the wording is unclear. It should be made clear that contributions should be related to the impact of each development. In line with Regulation 122 of the CIL Regulations, the contributions and improvements sought must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Matter 11b Transport

Since the submission of the Plan and the production of the Council's Transport Topic Paper (EB6), technical updates on transport and viability have been published.

Definition and scope of transport infrastructure required

2. Have all essential transport infrastructure elements been identified and does the Plan adequately address these needs in its identification of the scale and location of proposed development? Has the preparation of the Plan been consistent with paragraph 104 of the Framework which states that transport issues should be considered at the earliest stages of plan-making?

11.4 Yes, the Council's evidence base includes detailed work in respect of sustainable transport, as well as transport mitigation required. This work has been updated when required.

4. Will the mitigation measures identified be sufficient to address the highway impacts identified?

11.5 Ecotricity Group considers that they will be, and if anything, the Local Plan Traffic Modelling which identifies the mitigation measures is overly robust in that the measures should more than accommodate the Local Plan growth.

11.6 Given recent information published by the Department of Transport on traffic growth in the UK (issued in September and October 2022) that shows less base growth than was previously forecast for assessment purposes, we consider that the Local Plan Model could overestimate background traffic growth. This is further supported at a National Level by the proposed modal shift and reduction in traffic levels / miles driven per year in the Government's Decarbonising Transport: A Better, Greener Britain (July 2021), which longer term over the plan period would see less traffic than currently forecast. As a benchmark based on recent post Covid traffic data, it could be argued that the local plan model is overly robust given that traffic growth in the Southwest is now -0.3% post the COVID pandemic.

11.7 There does not appear to be an alternative scenario or sensitivity test in the updated traffic modelling that takes account of lower background growth or higher modal shift based on variables such as price elasticities, riding cost of fuel etc. . An overly robust prediction at this stage is likely to result in an over provision of highway mitigation which would not align with Stroud District Council's, Gloucestershire County Council's and to an extent National Policies' commitment to become carbon neutral within the plan period. Noting the modelling undertaken in the Traffic Forecasting Report Addendum, a stronger sustainable transport strategy could remove the requirements for some of the highway mitigation measures tested and help to meet net zero carbon.

Demand management and sustainable travel measures – Core Policy CP13

7. Core Policy CP13 seeks to support major development subject to three transport related criteria. It also provides a further 4 criteria to be met by all development schemes. The policy also expects proposals to 'consider all possible sustainable transport options' before increasing the capacity of the road network and to be consistent with and contribute to the implementation of the agreed transport strategy.

a) Is the policy consistent with national policy which includes seeking to minimise the need to travel and promoting sustainable transport modes?

11.8 Yes, the aims of this policy are consistent with the provisions at Chapter 9 in respect of promoting sustainable transport.

b) Does the policy set out clear requirements for sustainable transport provision? What is meant by the term 'consider all possible sustainable transport options'? What are developers meant to do after they have considered such options?

11.9 It is assumed that this is to reflect the overarching requirement of Policy DCP1, which looks *'to deliver the highest possible share of trips by the most sustainable transport modes'*.

11.10 The sustainable transport provision is set out in the District Council Sustainable Transport Plan which aligned with the County Local Transport Plan. Based on current National Guidance, developers are required to follow the same sustainable transport criteria.

11.11 Strategic Site Allocation Policy PS20 includes a number of criteria to ensure that sustainable transport enhancements are prioritised, which reflects the requirements of CP13. This includes: the provision of high-quality walking and cycling routes on and off-site, a multi-modal travel interchange hub to allow for interchange for sustainable modes including bus, bicycle, walking, other forms of personal transport and car sharing, as well as contributions towards sustainable transport measures on the A38 and A419, local bus services, and the re-opening of Stonehouse Bristol Road rail station.

d) Are the criteria justified and effective? Is it clear how a decision-maker should determine future proposals against each of the relevant criteria?

11.12 The Core Policy is to be read alongside more detailed delivery policies which help to provide additional background as to the expectations of the policy. Namely Policies EI12 to EI16 provide the specific criteria in respect of delivery of transport infrastructure, parking requirements etc.

e) Is the reference to 'having regard to ... the Council's adopted (parking) standards' appropriate? Are these the standards set out in Appendix C? Is the policy clear on this and are the standards justified?

11.13 Delivery Policy EI12 sets out more detail in respect of parking standards, which refers to Appendix C. This policy is to be read alongside CP13.

g) How does this policy relate to Delivery Policy EI12? Are the policies consistent? Is there unnecessary or confusing duplication between these policies?

11.14 As above, Delivery Policy EI12 sets out in more detail how the Core Policy CP13 is expected to be delivered. The Core Policy sets the tone in terms of the key aspirations, with transport being an important part of any local plan. The Delivery Policy assists in delivering the plan.

Delivery and viability

16. The Transport Funding and Delivery Plan (July 2022) (TFDP) identifies three transport mitigation packages. These are:

M5 Junction 12:

- **improvements to M5 J12 (a new grade-separated junction);**
- **Improvements to the A38 / A430 / B4008 'Crosskeys' Roundabout; and**
- **Improvements to the B4008 / Stonehouse junction.**

M5 Junction 14: comprising improvement to M5 J14 (a new grade-separated junction) and dualling of the B4509 between M5 J14 and A38.

A38 Corridor (This package includes the following number of individual junctions which have been identified for highway capacity improvements in the Traffic Forecasting Report (EB61)):

- **A38 / Grove Lane;**
- **A38 at Claypits;**
- **A38 / B4066;**
- **A38 / B4066 Berkeley Road;**

- **A38 / Alkington Lane; and**
- **A38 / A4135.**

Are these mitigation measures necessary and justified? Do they represent a comprehensive set of mitigation measures required to support the levels of growth set out in the Plan?

11.15 As picked up above, we are concerned that the background growth applied in the plan period does not reflect recent trends in traffic flows (reduction / no growth); however, with reference to Table 3 of the TFDP, background growth attributes most of the percentage impact that requires the various mitigation measures. It does not seem fair or proportionate that the various developments should pay for schemes that may not be required if the forecasting in the modelling is incorrect. i.e., that level of mitigation and improvements are not required on the SRN and A38.

11.16 Regarding PS20, the site's contribution to the M5 junction 12 schemes totals 10%, while the A38 totals 2% of the cost. However, additional requirements for the development of the site (as secured through the stadium permission) include improvements to Junction 13 as well as A419, as required in respect of the site's development. If growth assumptions are off, which account for between 70% and 86% of the growth on the M5 corridor, then there is a strong possibility the infrastructure improvements will not be required. There could therefore be a situation whereby highway infrastructure is paid for that may never be needed. Ecotricity would rather invest the funding in promoting green travel to the Site and within the District and County, in line with the broader objectives to be carbon neutral.

20. In the absence of national funding being available, the TFDP sets out a proposed apportionment methodology which would seek to take account of external growth from neighbouring authorities (including Gloucester, Cheltenham, Tewkesbury and South Gloucestershire). The TFDP goes on to explain that at this stage, the scale, location and nature of growth in these Districts is uncertain due to their respective Plan's being at an earlier stage of development. Nevertheless, modelling assumptions have been made in order to take account of growth from neighbouring Districts.

h) The TFDP distributes the growth apportioned for Stroud District to 12 site allocations. Is the scale and distribution of costs reasonable? Is there agreement that the costs set out are reasonably accurate? Have viability considerations been appropriately considered?

11.17 See answer to 16.

21. The Sustainable Transport Strategy (STS) Addendum (July 2022) lists 14 interventions to be included in the STS Addendum (Table 2.2). The schemes include a number of significant infrastructure projects that are referred to in the Plan including public transport for a strategic park and interchange hub scheme for M5 J12 and a new railway station (s) south of Gloucester, north of Bristol. Under funding status, all the interventions state 'still required'.

b) Reference is made to a Strategic Outline Business Case (SOBC) being produced for a potential rail station at Stonehouse which will test options and deliverability. What are the timescales for this piece of work and when is it expected to be completed? If the SOBC concludes that a new station would not be viable would there be any implications for the Plan?

11.18 In March 2020, Stonehouse Town Council and Rail Future submitted a bid to the Department for Transport's (DfT) Restoring Your Railway Fund. In March 2021, the DfT asked Stonehouse Town Council to submit a second bid to the Restoring Your Railway Fund. Stonehouse Town Council wrote the bid with support from Stroud District Council and Gloucestershire Community Rail Partnership. In October 2021, it was announced that the proposal to re-open Stonehouse Bristol Road Station has received a £50,000 award from the DfT's Restoring Your Railways Ideas Fund. The funding was for feasibility studies to develop the Strategic Outline Business Case (SOBC) for the station.

11.19 The SOBC was submitted to the DfT by Stonehouse Town Council, working in partnership with Stroud District Council, Network Rail, Great Western Railway and other key stakeholders including Gloucestershire County Council and the Gloucestershire Community Rail Partnership. Stonehouse Town Council are now awaiting an announcement from Government on whether the project can proceed to the next more detailed Outline Business Case stage.

11.20 In respect of PS20, significant sustainable transport measures can be introduced as part of the development of PS20, irrespective of the re-opening of this station. Therefore, whilst the allocation is not dependent on the re-opening of Stonehouse Bristol Road railway station, it would enhance the accessibility to the site further as it would remove the requirement for bus connections to Cam and Dursley and would be within walking and cycling distance of the proposed allocation.

23. The STS Addendum sets out a number of other proposed updates to site proposal and policies (page 15 onwards).

a) Are these proposals necessary and justified by the evidence?

11.21 These criteria reflect the specific criteria within the policies for the Site Allocations. In respect of PS20, comment has been made in respect of Matter 6, and namely Criterion 11, 14 and 20. Whilst Criterion 20 is an additional criterion not outlined in the STS addendum, it is considered that adjustments should be made to the wording of the PS20 policy as follows:

- The requirement to support the sustainable transport measures on the A38 and A419 sustainable transport corridors (PS20 Criterion 11) - Whilst it is accepted that improvements to the A419 are required, improvements may not be required for the A38 and this should be made clearer within the policy wording.

- The requirement for a dedicated shuttle bus (PS20 criterion 14) - The Stadium Planning Permission (S.19/1418/OUT) secured a dedicated shuttle bus service to be used on match days, between the site and Stonehouse and Cam and Dursley rail stations, and Nailsworth and Stroud town centre. The provision of a shuttle bus on match days is justified, but this wording should be updated accordingly. Furthermore, if Stonehouse Bristol Road station comes forward, the shuttle bus to Cam and Dursley will no longer be required so this should be an either/or.

c) In order to ensure that the Plan is effective should the updates be incorporated into the text for the relevant allocations/policies in the Plan?

11.22 The specific criteria are included within the wording for the allocation policies.

24. The STS Addendum has updated the assessment framework that fed into the modelling in order to understand the traffic impact of the site allocations on the District’s highway network. One of the considerations used in the update is stated as being a greater ambition towards sustainable travel across the District and to consider the impact of new sustainable transport interventions. Table 5.1 lists the effect of the updated assumptions, with most showing a reduction in the number of trips as a consequence of the updated considerations.

b) Given that there is some uncertainty over the funding status of many of the sustainable transport schemes listed in the STS Addendum was it reasonable to take account of these considerations?

11.23 In the case of PS20, the on-site and off-site measures will be delivered through S106 contributions as well as works secured by condition. In this sense, the site ‘consumes its own smoke’ and is not reliant on external funding.

c) If the sustainable transport interventions cannot be delivered in the right place and at the right time to support the allocations, what effect, if any, would this have on the updated modelling assumptions in terms of impact on the highway network?

11.24 Whilst there would be ‘higher’ growth, the base model is overly robust as it assumes too much growth against revised forecasts and Government Policy to reduce traffic. In our view the impact has therefore already been tested (see answer to 4).