



Q1a. Are the proposed works to M5 Junction 12 effective and do they overcome the junction capacity constraints to local plan growth?

1. SevenHomes is concerned that in respect of both Junction 12 and Junction 14 upgrades, questions have to be raised about the deliverability of these works and, therefore, the Plan's "effectiveness" in soundness terms
2. SevenHomes does not dispute the costs in the AECOM Report (EB113B) or other aspects of the technical work presented. Instead, it wishes to highlight points associated with the Reg 19 Local Plan, the Infrastructure Delivery Plan and EB133B.
3. Paragraph 2.3.3 sets out that the scheme costs for the two junctions range from £140 million to £210 million (junction 12) and 100 to 120 million (junction 14).
4. The IDP (EB110) paragraph 2.1.1 identifies the following costs for upgrade packages:
 - Junction 12 – £15.6 million
 - Junction 14 - £ 27.3 million
5. The figures now presented in EB133B are significantly higher than anticipated in the EB110 and the Local Plan by approximately £100 million per junction. This leads to the inevitable question of how this infrastructure can be delivered through the various strategic sites without government intervention and how realistic government intervention is.
6. The recent letter by the Secretary of State Matthew Pennyhook about examining plans states:

"In 2015, the Government set out an expectation that Inspectors should operate "pragmatically" during local plan examinations to allow deficient plans to be 'fixed' at examination. This has gone too far and has perversely led to years of delays to local plan examinations without a guarantee that the plans will ever be found sound, or that the local authorities will take the decisions necessary to get them over the line. This has to end."
7. It is our position that the Inspectors' have been very pragmatic, but is it clear from the evidence presented through this consultation that the major issue of infrastructure and



its delivery in respect of Junctions 12 and 14 still needs to be 'fixed'. The Minister's letter does empower Inspector's to make those tough decisions and recommend that Plans are withdrawn. This was welcomed by the Chief Executive of PINS.

8. Given the above, SevenHomes continues to express its concern about the soundness of the Plan. The information on J12 and J14 underline that the Plan is ineffective, as the cost evidence base has flaws.

Q5a. Do you have any comments on the next steps evidence provided by the promoter on the reintroduction of Sharpness Vale Passenger Rail Service?

1. Mcloughlin Planning has the following points it wishes to raise in respect of EB136 and Appendices 1-6
2. It is SevenHomes' position that it has serious doubts about the achievability of reintroducing the passenger rail service to support the proposed allocation. This is because the role of the station and the rail service has expanded beyond the assumptions made in the Plan.
3. Two of the tests of soundness are that a Plan should be "justified" and "effective". The first of these elements is that it is an appropriate strategy, considering alternative and based on the use of "proportionate evidence". The second element is that it should be deliverable over the plan period.
4. In making the allocation, Policy PS36 part 19 of the Plan sets out the following requirements:

"New railway station and enhancements to the Sharpness branch line and contributions to support a regular passenger service to Gloucester."

5. This requirement will have been informed by several evidence documents, including:
 - EB62c – 'Restoring your railway ideas Fund Bid
 - EB110 – Infrastructure Delivery Plan
6. Both of these documents anticipated a service from Sharpness into Gloucester.

STROUD LOCAL PLAN CONUSTLATION

On behalf of SevenHomes

0600



7. During the EiP, Matter 5, it is clear that there is some uncertainty about the actual requirement for a railway station, with the Council taking the position that it has to be provided and, therefore, a policy requirement. In contrast, the promoting party took the position that it is a "small element" of the development and has "no implications" if the railway station is not delivered (this is evidenced in the YouTube recording of Wednesday, 3 May 2023, at the 5.58-hour mark).
8. The additional evidence presented by the Council through this consultation shows that the picture regarding the reopening of the Sharpness branch line is far from clear. The documentation recognises that the current arrangement of Sharpness services to Cam and then onto Bristol is not time efficient (it's just as quick to drive) and that the passenger experience is disjointed. As a result, the work now undertaken looks at an alternative development, Option B, which now includes a "southern chord," allowing a train service to travel directly from Sharpness to Bristol without changing at Cam.
9. The issue with this is that this represents a further step away from the allocation as initially proposed, and this serves to underline the flawed development strategy the Council has selected to produce the Plan. SevenHomes is not contesting the ultimate delivery of the Sharpness allocation. It contests the Council's strategy decisions in drafting the Plan. This consultation shows that the original 'plan' was to deliver a new community at Sharpness, which would have access to a direct railway service to Gloucester City. From that point, onward journeys to other locations would be possible.
10. The work produced shows that there are severe issues with this approach. It is just as quick to drive to the major economic centre of Bristol as to catch a train from Sharpness. This has necessitated the rail aspirations to be further revised and expanded, which now includes the development of a new railway line, linking the proposed Station at Sharpness to the southern mainline to Bristol. This makes Sharpness a different proposition in that it can now serve as Bristol's commute hub. Turning to the deliverability of this, a cost is provided in the documents at circa £51 million. Still, no further information is provided about the certainty of where this funding is coming from and the timetable for doing so.
11. This expanded railway proposal conflicts with other parts of the Plan. Paragraph 2.6.7 of the Plan identifies out-commuting as a significant challenge to the Council's aim of reducing its carbon footprint. The paragraph sets out the Council's aims to encourage inward investment to stem the flow of out-commuting. Actively looking at an enhanced



railway link option to Bristol directly conflicts with this aim and thus undermines the priority issue (page 11 of the Plan) of being carbon neutral by 2030.

12. As a consequence, the consultation documents undermine the Plan's position that it is justified and effective because:

- The strategy in the Reg 19 version has evolved to facilitate more accessible links to Bristol, enhancing out-commuting.
- The delivery of the infrastructure remains unclear.

13. The Council can adopt an alternative strategy based on greater dispersion of housing across the various tiers of settlements covered within the Plan. This dispersion strategy will not require the delivery of complex and doubtful large-scale infrastructure.

Q5b. In order to assist the examination, the Inspectors would like a summary of your comments to Q5a (Please do not exceed 250 words).

14. The documents underline the fact that the delivery of the Sharpness Garden Village in the form proposed by Policy PS33 is not precise and as a result, cannot be considered Justified or Effective

Change Sought

15. Re-appraisal of the development strategy of the Plan to reflect the shift in the assumptions for Sharpness Garden Village. This will require revisiting the 'local' allocations to increase (where possible) housing delivery from these sites and locations.

Q3a. Do you have any comments on the housing trajectory presented in EB134 Housing Delivery?

16. SevenHomes continues to be concerned about the housing land supply situation in Stroud District, and the material provided does not change that position.

17. Starting with the Local Plan, Page 306 sets out the Plan's assumption on delivery. The graph shows that the delivery of housing is front-loaded in the plan period, tapering off from 2032 onwards, where delivery is below the annualised target. The graph is supported by Table 6, which shows the projected delivery from the strategic allocations and this shows:

STROUD LOCAL PLAN CONSULTATION

On behalf of SevenHomes

0600



- Between 2020 and 2025 – 626 units will be delivered from strategic sites.
- Between 2025 and 2030 – 3077 units will be delivered from strategic sites.

18. In comparison, the housing trajectory (EB134) on consultation shows:

- Between 2020 and 2025 – 0 units will be delivered from strategic sites.
- Between 2025 and 2030 – 1577 units will be delivered from strategic sites.

19. This represents a shortfall of **2126** units compared to the assumptions made in the Reg 19 version of the Local Plan.

20. This analysis highlights SevenHomes' consistent concerns about the overall delivery of housing through the Plan period. These concerns are linked to the Plan's strategy, which places an over-reliance on the delivery of strategic sites.

21. It shows that the Council's initial assumptions in formulating the Plan are wholly unrealistic. Consequently, the Plan fails to meet the soundness test of effectiveness and the guidance in paragraph 60 of the NPPF, which concerns "significantly boosting" the housing supply. This shows that the key strategic allocations are not coming forward anytime soon to the levels anticipated originally by the Plan.

22. Matters are further complicated by the difficulty of presenting the data, as it is not possible to read this data in the context of the overall supply picture provided by other Council documents, such as the January 2024 Housing Trajectory.

Year	EB134	Jan 24 Trajectory	Difference
25/26	841	740	101
26/27	963	847	116
27/28	805	606	199

STROUD LOCAL PLAN CONUSTLATION

On behalf of SevenHomes

0600



28/29	865	375	490
29/30	996	375	621
Totals	4470	2943	1527

23. This shows that the consultation document is currently overestimating the actual levels of delivery compared to the Council's housing trajectory data.

24. Turning to the Site Allocations, SevenHomes wishes to make the following observations about the sites listed for those commencing delivery in the next 5 years (period 2025/26 to 2029/30). Essentially, the concerns relate to the start date for delivery on the allocations. What follows is a site-by-site commentary.

- PS24 – No application in with the Council, and what certainty does it have that delivery will actually commence on 26/27? This will require the submission of a major application, potentially EIA. It is unrealistic to expect it to deliver in the next 5 years (- 322 units from the trajectory as a minimum)
- PS30—There is no application in with the Council. What certainty does it have that delivery will actually commence on 26/27? This will require the submission of a major application, potentially an EIA. (-100 units)
- PS34 – The site is not subject to a planning application, and planning permission was refused in March 2024. No Appeal has been submitted. (-45 units)
- PS36 – It is assumed that the site will deliver 155 units in the first year of development. This does not reflect a lead-in period, which has been evidenced in the other strategic site allocations. It would be more realistic to assume 50 dwellings in the first year of delivery. (-105 units)

STROUD LOCAL PLAN CONUSTLATION

On behalf of SevenHomes

0600



- PS37 - No application in with the Council – what certainty does it have that delivery will actually commence on 26/27? This will require the submission of a major application, potentially EIA, which will take time to deliver. (-125 units)
25. This removes 697 units from the trajectory's anticipated delivery of 1577 units from the Strategic Sites housing trajectory. The following should be noted when turning to the local site allocations.
- PS02 – Brimscombe Port The trajectory anticipates 150 dwellings being delivered in the next 5 years. It is understood that the Council has signed an agreement with St Modwen Homes which anticipated an application being submitted in 2022. No such application has been submitted. Given the level of works required for the site (including a new dock basin) it remains to be seen (unless evidence is available) that these units can be delivered in the timeframe. (-150 units).
 - PS06 – the site has the benefit of an outline planning application currently pending determination. However, its redevelopment is tied to providing a new football stadium for Forest Green Rovers at Eastington. The stadium has yet to be delivered and there is no timetable for the stadium's completion (-90 units)
 - BER016/17 – Currently the subject of an EIA screening request for a proposed development of up to 70 dwellings (allocation was for 60). Screening request includes land outside of the allocation. Delivery anticipated 25/26 and this is doubtful given that there is no application in.
26. The recent Appeal decision in respect of PS41 and the granting of planning permission on PS45 shows that Local Site Allocations can come forward in advance of the Local Plan

Q3b. In order to assist the examination, the Inspectors would like a summary of your comments to Q3a (Please do not exceed 250 words).

27. SevenHomes 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.