

Stroud District Local Plan Review Additional Technical Evidence – Limited Consultation.

On behalf of Robert Hitchins Ltd in respect of PS36
Sharpness new settlement

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Contents.

1. Introduction.....	1
2. EB98 Traffic Forecasting Report Addendum.....	2
3. EB108 Sustainable Transport Strategy Addendum (July 2022).....	5
4. EB109 Transport Funding and Delivery Plan (July 2022).....	8
5. EB110 Infrastructure Delivery Plan (IDP) Addendum Report (August 2022).....	12
6. EB112 SALA Accessibility Scoring Note (August 2022).....	16
EB112a SALA Transport Accessibility Assessment November 2020.....	16
EB112b SALA Transport Accessibility Assessment October 2019.....	16
EB112c SALA Transport Accessibility Assessment July 2018.....	16



1. Introduction

- 1.1. Pegasus Group has been instructed by Robert Hitchins Ltd to respond to the consultation on Stroud District Local Plan Review Additional Technical Evidence. This follows from our representations to the Reg 19 Local Plan consultation submitted in July 2021.

- 1.2. PFA Consulting have responded to the following documents:
 - EB98 Traffic Forecasting Report Addendum
 - EB108 Sustainable Transport Strategy Addendum (July 2022)
 - EB109 Transport Funding and Delivery Plan (July 2022)
 - EB110 Infrastructure Delivery Plan (IDP) Addendum Report (August 2022)
 - EB112 SALA Accessibility Scoring Note (August 2022)
 - EB112a SALA Transport Accessibility Assessment November 2020
 - EB112b SALA Transport Accessibility Assessment October 2019
 - EB112c SALA Transport Accessibility Assessment July 2018

- 1.3. In each case we have referred to the policies and provide a summary.

2. EB98 Traffic Forecasting Report Addendum

2.1. Comments: Which sites or policies do our comments relate to:

- **Policy PS36 Sharpness**

2.2. The updated modelling work which has informed the Addendum provides a cumulative assessment of the traffic impacts associated with the emerging Local Plan site allocations and proposed highway mitigation. It reflects the revised site allocations and quantum of development now proposed; no changes to the housing or employment quantum for PS36 Sharpness are however proposed in the Addendum.

2.3. The Addendum concludes that the overall impacts of the updated modelling have shown that the revised Local Plan allocations do not appreciably affect the proposed highway mitigation previously identified in the original traffic forecasting report; although the increased development at Javelin Park comprising 27 hectares will likely put greater pressure on the highway network in and around M5 J12 which may require additional mitigation.

2.4. With respect to PS36 Sharpness, our previous representations which reviewed the Stroud Local Plan Traffic Modelling – Traffic Forecasting Report, March 2021 continues to apply; the updated modelling reveals that **significant highway mitigation will be needed** to reduce the impacts of traffic associated with the site.

2.5. For the Sharpness area the modelling identifies large traffic flow increases on the various routes connecting Sharpness with the A38; whilst most of this traffic is shown to use the B4066 notable increases are shown on the minor routes through Stone to the south and Breadstone to the north.

2.6. Significant increases in traffic are shown on the A38 and at M5 Junction 14 which is forecast to have significant congestion without mitigation.

2.7. Highway Mitigation identified for the Sharpness area includes:

- A38 / B4066 (ID17) – junction signalised
- A38 / Breadstone (ID18) – no improvements to avoid rat-running traffic on inappropriate road
- A38 / B4066 Berkeley Road (ID19) – junction signalised
- A38 at Stone (ID20) – no improvements to avoid rat-running traffic on inappropriate road
- A38 / Alkington Lane (ID21) – junction signalised
- B4066 / Station Road (ID22) – widening on B4066 approach
- A38 / A4135 (ID23) – widening on A38 northbound approach
- A38 / Wick Road (ID24)

- B4066 / Alkington Lane (ID30) – junction signalised
- M5 Junction 14 (ID25 & ID26) – new grade separated all movements interchange

- 2.8. From the **above it is clear that significant highway mitigation is needed to accommodate the additional traffic from the strategic allocations at Sharpness.**
- 2.9. M5 Junction 14 currently experiences significant congestion at peak times which will be further exacerbated with Local Plan demand. As such a significant improvement scheme comprising a new all movement grade-separated junction incorporating two overbridges is proposed as part of the 'Preferred Highway Mitigation Strategy'. Such an improvement would be very costly and would take time to deliver particularly as it is not currently in a capital programme and no funding sources have yet to be identified. The timing of the works would likely affect the delivery of development at Sharpness, as given the existing capacity issues the improvement would be needed prior to any significant scale of development.
- 2.10. A review of the traffic modelling methodology has been undertaken with respect to the allocation at Sharpness. The modelling has assumed a significant level of self-containment at Sharpness (18% reduction to residential trip rates in the AM peak and 10% reduction in the PM peak). This reflects the on-site employment and secondary school. Following an allowance for self-containment vehicle trips have been distributed onto the modelled highway network. Given the remoteness of Sharpness in terms of its proximity to existing working populations and away from the main movement corridors, it is unlikely that any significant employment will be attracted to this area to achieve the expected levels of self-containment assumed in the traffic modelling (the adopted Local Plan 2015 allocated 7 hectares of employment at Sharpness which has yet to come forward for development). Increased out-commuting to the established employment areas of the larger towns and cities, which our previous representations have shown to be remote from Sharpness, will only exacerbate the unsustainability of the allocation at Sharpness.
- 2.11. The residential distribution reveals that the traffic modelling has assumed nearly a quarter of all vehicle trips (23%) from the allocation at Sharpness (PS36) to be to the Berkeley area. This figure appears high given the relatively few jobs within the Berkeley area. This pattern of local trip distribution has also been applied to the proposed employment at Sharpness with the employment distribution showing 26% of vehicle trips from Berkeley.
- 2.12. Further reductions have been applied to vehicle trips for the strategic allocations to account for proposed sustainable travel interventions set out in the STS. The updated modelling reductions set out in the STS Addendum at Appendix A reveals that for trips to/from Gloucester and Bristol a 20% reduction has been applied for trips to/from the Sharpness site (PS36) to reflect the proposed "direct public transport services to key destinations including Bristol, Gloucester and employment nodes". **This percentage reduction is significantly greater than all the other Local Plan strategic allocations where reductions of between 5% - 15% have been applied reflecting contributions and support for public transport services. It is unclear why Sharpness has been assumed to have a greater potential for transfer to public transport than the other Local Plan sites, particularly given its isolated location away from the sustainable movement corridors, greater travel distances and the disparate range of employment destinations for journeys to work?** One potential reason why a greater percentage is given, could be to do with the potential for the re-opening of the Sharpness railway branch line; the notes in the STS Addendum state that the "modelled

value incorporates potential for the rail service to be delivered". As this is unlikely to come forward, the percentage reductions for PS36 Sharpness can be considered to be inflated.

- 2.13. Based on the above, the updated traffic modelling is likely to **underestimate** the traffic impacts on the wider highway network from the proposed allocation at Sharpness. Further mitigation to that identified in the 'Preferred Highway Mitigation Strategy' would likely be required should the development traffic reductions assumed by the sustainable travel interventions and/or the assumed distribution patterns not be realised.
- 2.14. We have a concern that the traffic modelling and mitigation has only considered the impacts of 2,400 dwellings and 10 hectares of employment at the PS36 Sharpness allocation; it does not take account of the additional development comprising a further 2,600 dwellings (more than double the dwellings assessed) which the site is expected to deliver beyond the plan period to 2050. The additional mitigation to accommodate these additional numbers has not been tested; there is no way of knowing if appropriate mitigation can be delivered to facilitate these increases, whether that be for reasons of viability, road capacity, logistics etc. Given this uncertainty we could be left with a half-finished project that is likely to lack certain elements which are vital to make the new settlement whole. To allocate the site at Sharpness certainty would be needed that the complete development could be appropriately mitigated and delivered (there is currently no evidence to suggest this to be the case).
- 2.15. Notwithstanding this the issues that we have raised concerning the site's remoteness away from the main movement corridors and main centres of employment, with limited opportunities for sustainable travel will equally apply to the additional future housing that might be expected if the site were to be developed. The allocation will therefore have far reaching consequences well beyond the plan period which will affect the ability of the Council to meet its Climate Change objectives and strategy of encouraging sustainable modes of travel.

Summary

- 2.16. **The updated traffic modelling continues to underestimate the traffic impacts on the wider highway network from the proposed allocation at Sharpness, and only assesses 2,400 dwellings as opposed to the total number planned of 5,000 dwellings. Further mitigation to that identified in the 'Preferred Highway Mitigation Strategy' would likely be required should the development traffic reductions assumed for sustainable travel from the site not be realised, or the additional housing comprising the total allocation for the site as a whole. It highlights the existing capacity constraints at the two motorway junctions at M5 J12 & M5 J14 and junctions along the A38 corridor, for which significant new infrastructure will be needed to accommodate the planned growth in the Local Plan.**

3. EB108 Sustainable Transport Strategy Addendum (July 2022)

- 3.1. Comments: Which sites or policies do our comments relate to:
- Policy PS36 Sharpness
 - Policy CP6 Infrastructure and developer contributions
 - Policy CP13 Demand management and sustainable travel
 - Policy EI12 Promoting transport choice and accessibility
- 3.2. The Sustainable Transport Strategy (STS) Addendum was prepared to reflect changes to policy and guidance framework since the original publication of the STS in 2019. It responds to changes in the site allocations, updates to policy and includes a number of additional interventions for mitigation.
- 3.3. The policy updates include DfT's 'Decarbonising Transport: A Better, Greener Britain' which was published in 2021 and sets out the UK Government's plan to decarbonise transport and achieve net zero emissions from all transport modes by 2050. It draws on the 'Decarbonising Transport: Setting the Challenge' published in 2020 which concluded that a substantial shift to active travel and public transport is imperative to meet the 2050 target. Public transport needs to be cost-effective and convenient to encourage fewer people to drive and increase public transport usage, with walking and cycling being the natural choice for all shorter journeys and part of longer journeys by 2040.
- 3.4. The local policy updates include reference to Gloucestershire Bus Service Improvement Plan (BSIP) which was produced by GCC in 2021. The BSIP focusses on an overall ambition for bus travel to be the de-facto choice for all transport requirements with improved integration with other transport modes a central part of the Plan. This makes specific provisions to improve the "express bus network" in Stroud District which focuses on the A38 corridor south of Gloucester, and the A419 corridor running east-west linking Stroud and Stonehouse, and to Gloucester both via the A38 and the B4008. No "express network" is proposed in the Sharpness area.
- 3.5. Whilst these policies are supported, the PS36 allocation is not consistent with the intent of these policies. To achieve the carbon emission reductions needed to meet the policy objectives and targets set out above, it will be important that the Local Plan allocates development in locations that are already sustainable or can be made sustainable. **This is not the case for PS36 Sharpness which our previous representations have shown to be in a location which is some significant distance from the main movement corridors and major centres of employment and cannot provide a sustainable opportunity for development. It does not offer a realistic choice of sustainable transport modes and will encourage travel by car which will do little to improve air quality, cut emissions and reduce congestion.**
- 3.6. The Addendum sets out the following updates to site proposals / policies in respect of PS36 Sharpness:

- The development should provide high-quality and accessible cycling and walking routes, connecting to employment, local and educational centres. Furthermore, appropriate off-site active travel infrastructure and routes to be put in place to connect the new development Berkeley green, Berkeley town centre, Sharpness, Newton and to national cycle and canal networks;
- The development will lead to enhancements to the Sharpness branch line and support a regular passenger service to Gloucester; and
- Measures to reduce car usage and ownership will be part of the development, which will include Mobility-as-a-Service systems, bike hire schemes and incentives for public transport use.

3.7. In respect of the Sharpness branch line for the reasons set out in previous representations it is considered that the detail of rail information critical to understanding the deliverability of the new community at Sharpness does not exist. **There appears to be no certainty, clarity of what is proposed or the timing of the provision of new infrastructure to support the proposed allocation; consequently, the allocation is not justified and effective and the inclusion of the new community at Sharpness seriously undermines the delivery of the site and the soundness of the Plan.**

3.8. With regard to Mobility-as-a-Service and public transport use for the reasons set out above, **it is considered that the allocation of land at Sharpness, an inherently less sustainable location, over sites already served by public transport, would be contrary to Policy LTP PD O.4 of the adopted Local Transport Plan and Delivery Policy E12 of the emerging Local Plan.**

3.9. The commercial case to provide a relevant bus or coach-based public transport service from Sharpness is questioned by both Gloucestershire County Council, in its role as local highway authority, and Stagecoach, a highly experienced public transport operator. GCC, the local highway authority, commissioned a Rail Service Viability Statement of Opinion in respect of the Sharpness (PS36) allocation which concluded that ***“the scheme does not currently have a compelling business case. It requires an investment of £34.85m and the resulting service will require subsidy on an ongoing basis.... It is our opinion that, based upon the current situation, that there are considerable risks to this scheme which make it unlikely that it would gain the necessary approvals for the scheme to progress to delivery.”***

3.10. **GCC’s Reg 19 representations concluded that the evidence for the allocation is not sound; the development is unsustainable when considered against the policies outlined in both the NPPF and Stroud District Local Plan; and the transport measures proposed are not considered viable or deliverable, and the future residents are expected to behave in a way that is not evidenced in any other location with similar, dislocated attributes, both geographically and in terms of transport opportunities.**

Summary

3.11. **The STS Addendum does nothing to change our conclusions from our previous representations that the PS36 Sharpness allocation is in an unsustainable location some significant distance from the main movement corridors and major centres of employment. It does not offer a realistic choice of sustainable transport modes; the proposed new rail service cannot be guaranteed and the commercial case to provide a**



relevant bus or coach-based public transport service is in question. Consequently, development here will encourage travel by car which will have a significantly negative impact on air quality, and do little to improve traffic congestion.

4. EB109 Transport Funding and Delivery Plan (July 2022)

4.1. Comments: Which sites or policies do our comments relate to:

- Policy PS36 Sharpness
- Policy CP6 Infrastructure and developer contributions
- Policy CP13 Demand management and sustainable travel
- Policy EI12 Promoting transport choice and accessibility

4.2. The Funding and Delivery Plan (FDP) has been prepared on behalf of SDC to inform the ongoing production of the IDP. The key aim of the FDP is to determine the sources of funding for major transport mitigation, specifically in relation to the amount of funding to be delivered by SDLP development allocations as well as from future strategic development within neighbouring local authority areas.

4.3. The FDP informs the IDP and viability assessment. **It does not consider all necessary transport mitigation but focuses on three 'Mitigation Packages' which have been identified as strategic and requiring funding from multiple sources.**

4.4. The FDP explains that the approach to mitigating the highway impacts of the SDLP is in accordance with the sustainable transport hierarchy. However, it is acknowledged that for some locations the most appropriate mitigation is likely to comprise highway and traffic measures e.g. M5 J12 and M5 J14.

4.5. The FDP explains that the mitigation schemes identified through the strategic modelling exercise have been reviewed in terms of cost; scale of impact to be mitigated; the origins of the traffic impact; and the appropriateness of the scheme in relation to SDC's climate emergency agenda. It states that this has been undertaken in collaboration with GCC, SDC, NH and South Gloucestershire Council (SGC) but not the JCS authorities.

4.6. The FDP has focused on the three key packages of mitigation at M5 J12, M5 J14 and A38 corridor, to determine how they can be funded to inform the IDP. These are the "big-ticket" items which are exceptionally costly and where affordability and deliverability will be key in delivering the Local Plan growth.

4.7. The indicative costs that have been identified in the FDP for the three packages of mitigation measures are set out in Table 2; with the exception of the M5 J14 package, the costs have been derived from those originally identified in the GLTP4 which were simply approximate cost bandings and not based on any detail. **Given the importance of these mitigation packages to the delivery of the Local Plan more informed costings are absolutely essential as they appear to be significantly underestimated.**

4.8. The scheme cost for a new grade separated junction at M5 Junction 12 set out in Table 2 is £6.25m. The source is quoted as the IDP. The accompanying text confirms that the values presented are half the midpoint costs of those outlined in the GLTP4, which is an estimated cost band of £5m - £20m, so $£12.5m \div 2 = £6.25m$. GCC has advised that the costs are based

on experience of scheme delivery as a Local Highway Authority and contingency allowances are inherently included. There is no detail as to how the cost band of £5m – £20m has been derived and **it is considered that the scheme cost of £6.25m for a new grade separated junction at M5 Junction 12 is a gross underestimate based on a crude methodology**. By way of sense check, the FDP includes a scheme cost of a new grade separated junction at M5 Junction 14, prepared by AECOM and this is £27.2m excluding land cost.

- 4.9. Furthermore, a recent contract has been awarded for £38.1m from the Housing and Infrastructure Fund to deliver highway improvements on the A249 to the west of Sittingbourne in Kent¹. The scheme is to improve the Grovehurst Road and A249 junction by replacing the existing “dumbell” junction with a two-bridge flyover. This would be similar to what is being proposed for M5 J12 & M5 J14 albeit it is not a Motorway. **This confirms our concerns that the costings provided in the FDP and IDP Addendum are grossly underestimated.**
- 4.10. The A38 Corridor package comprises six improvement schemes for junctions on the A38. Again, the costs for each have been based on arbitrary costs bands from the GLTP4 which explains why four of the six junctions have the same cost of £625,000.
- 4.11. As the costs of the package of mitigation schemes is the starting point before apportioning funding to allocated sites, it is imperative that the costs are realistic, even if they are indicative at this stage. The level of funding will impact the affordability and deliverability of the proposed mitigation which will have implications on the soundness of the Local Plan in delivering development in a timely manner. The traffic modelling has shown that these improvements are needed before any significant development can come forward.
- 4.12. The M5 Junction 12 and M5 Junction 14 packages are in relation to junctions with the SRN. The FDP states that further to discussions with NH, it is understood that neither of these locations is likely to receive Road Infrastructure Strategy (RIS) funding within the timescale of the SDLP. As such, alternative funding and delivery needs to be identified within the SDLP. These are the “big-ticket” items which are extremely expensive, the funding for them will directly have a bearing on the delivery of those sites that are reliant on them being delivered; this is the case for PS36 Sharpness which the traffic modelling has shown has a significant impact on all three mitigation packages, particularly at M5 J14 and the A38 corridor.
- 4.13. The FDP confirms that both the costs and apportionment have been supplied to ARUP, the authors of the IDP, to ensure that a consistent and appropriate cost can be applied within the IDP, which feeds into the viability analysis. The FDP later states that the preparation and examination of the SDLP is a point in a process, and SDC will continue to work with the parties as other plans progress, in order to refine the mitigation schemes and the funding apportionment.
- 4.14. The methodology adopted is set out as follows:
- Differentiate between SDLP Growth and Background Growth

¹ <https://www.kent.gov.uk/roads-and-travel/road-projects/planned-road-projects/A249-Grovehurst-Road-and-Key-Street>

- Differentiation between Economic Growth and Growth Driven by Development in Neighbouring Authorities
- Differentiation of Growth from Neighbouring Authority Development
- Apportionment of SDLP Funding to Allocation Sites

- 4.15. Table 8 of the FDP sets out the proportional impacts from the SDLP applications. It can be seen that PS36 Sharpness is apportioned 5% of the M5 J12 mitigation package, 24% of M5 J14 and 40% of the A38 corridor. The SDLP has applied a “sifting” process whereby those developments which have less than 5% impact on the mitigation package network are not considered suitable to provide funding and the allocation has been re-assigned to the remaining sites on a pro-rata basis (Table 9). **There appears to be an error in the sifting process in respect of PS36 Sharpness. Table 8 shows a 5% ‘impact’ on M5 Junction 12 and Table 9 shows 0%; PS36 Sharpness has been incorrectly sifted out and has been apportioned 0% of the M5 J12 mitigation package.**
- 4.16. **It can be seen from Table 9 that PS36 Sharpness has the greatest impacts of all of the allocated sites at both M5 J14 and the A38 corridor with apportionment of 34% and 47% respectively. It therefore has a strong reliance on the timely delivery of these mitigation packages to enable development to come forward.**
- 4.17. Table 10 sets out the funding requirements for each of the SDLP allocations based on the sifted proportions in Table 9 and the indicative costs set out in Table 2 (see above comments regarding grossly underestimate scheme costs). The FDP confirms that these proportions and financial values have been issued to the IDP team to ensure consistency with the IDP and viability assessment.
- 4.18. Table 11 of the FDP sets out the proportions of the total mitigation funding by SDLP allocation. PS36 Sharpness is assigned 0.0% of the M5 J12 mitigation package, 6.8% of M5 J14, 28.3% of the A38 corridor.
- 4.19. Critical to the delivery of the plan, the FDP calculates that circa 42% of the cost of the M5 J12 mitigation package, 80% of M5 J14, 40% of the A38 corridor to be funded by Neighbouring Authorities.
- 4.20. According to the FDP, it will be for external Local Plans to apportion funding requirements to allocations, as those Plans come forward and from SDC’s perspective, there is a reasonable prospect that this funding will become available, based on the remaining need for Neighbouring Authorities to allocate and deliver housing, and the apportionment method used being fair and proportionate. In addition, there are potentially external funding sources, such as Homes England, which may be available to unlock housing growth should there be a funding shortfall in future. However, as set out in the FDP the West of England Combined Authority’s Spatial Development Strategy is currently in abeyance, with no timescale or certainty on its next steps; and the SGC Local Plan is at a very early stage, as is the Gloucester, Cheltenham, Tewkesbury Joint Spatial Plan thus, limited information is known on the locations or timing of housing growth outside of the Stroud District. This has not been discussed with the JCS authorities and there is no timescale or certainty and limited information on the locations or timing of housing growth outside of the Stroud District as acknowledged by the FDP, (the preparation of the review of the JCS has slipped against the original LDS and a Preferred Options consultation is envisaged in Spring 2023).

- 4.21. The reliance on Neighbouring Authorities places the delivery of the SDC LP almost entirely at the ransom of other local plans progressing to adoption and adopted sites progressing to consents, and these consented sites being sufficiently viable to contribute to the significant costs for key infrastructure. Additionally, even if viable, the likelihood of developers signing to pay up front for such significant contributions has to be subject to doubt, and therefore not only is the securing of contributions per se uncertain, but also, even if secured, the timing is uncertain and again this ransoms the SDC LP.
- 4.22. Whilst the FDP and IDP identify improvements to both M5 J12 & M5 J14 there are no drawings detailing what is proposed for this key strategic highway infrastructure which are fundamental for delivering the Local Plan growth. It is understood that an interim scheme for M5 J14 has been considered by National Highways; however, no details have been provided.

Summary

- 4.23. **It is of paramount importance to the SDLP that schemes and accurate cost estimates for M5 J12 & M5 J14 and the A38 corridor are established. Only once accurate costings of the schemes have been established and the apportionment of costs undertaken, can any shortfall in funding be known, and the likelihood or otherwise, of other sources of funding actually being available. If the schemes could be fully funded, then the timescales for their delivery will be important given that many of the strategic site allocations rely on them to be delivered before any significant amount of development can come forward.**
- 4.24. **There is a gross underestimate of the cost of M5 Junction 12, errors in the apportionment of impacts and an expectation that significant proportions of the funding of the mitigation packages will come from Neighbouring Authorities which is not guaranteed. This questions the affordability and deliverability of the proposed mitigation packages to deliver the Local Plan growth, particularly early on in the plan period.**

5. EB110 Infrastructure Delivery Plan (IDP) Addendum Report (August 2022)

5.1. Comments: Which sites or policies do our comments relate to:

- Policy PS36 Sharpness
- Policy CP6 Infrastructure and developer contributions
- Policy CP13 Demand management and sustainable travel
- Policy EI12 Promoting transport choice and accessibility

5.2. The Infrastructure Delivery Plan (IDP) 2022 Addendum provides an update to the 2021 IDP; it identifies infrastructure required to support housing and employment growth, including estimated costings for such infrastructure.

Transport

5.3. The document refers to the “AECOM Mitigation Review” which has reviewed the mitigation proposed within the Traffic Forecasting Report and the GLTP4. It is unclear if this “review” is documented as nothing has been published to date. What is clear is that the AECOM review has informed the package of mitigation included within the IDP Addendum and the Funding and Delivery Plan (EB109) which focuses on the transport infrastructure requirements at three key locations: M5 J12, M5 J14 & the A38 corridor. These three packages of mitigation are the “big-ticket” items, the cost and deliverability of these will be key in ensuring the soundness of the development strategy of the Local Plan.

5.4. There are two key highway infrastructure projects on the strategic highway network at M5 J12 & M5 J14 which are bound to be extremely costly where the risks in terms of affordability and deliverability will be inflated. Both these junctions operate close to capacity today so the ability to deliver any significant development at these locations without any improvement will be limited.

5.5. **The costings given in the IDP Addendum for M5 J12 appear to be significantly underestimated; a value of 6.25m for a new grade separated junction cannot be correct.** It is understood that the costings have been based on what was included in the GLTP4 where a range of 5m–20m was identified for capacity and safety improvements at M5 J12 (GLTP4 page 214 Ref: CSV13). The 6.25m value was calculated by taking half of the midpoint cost (12.5m/2=6.25m). This methodology is very crude given the importance of the mitigation at M5 J12 in the Local Plan.

5.6. The AECOM mitigation review established the cost of a new grade separated junction at M5 J14 to be 27m. Given that the improvement at M5 J12 is broadly similar to that at M5 J14, you would have thought that a “sense check” would have highlighted the issue of the unrealistic cost given for M5 J12.

- 5.7. By way of a comparison, a recent contract has been awarded for £38.1m² from the Housing and Infrastructure Fund to deliver highway improvements on the A249 to the west of Sittingbourne in Kent. The scheme is to improve the Grovehurst Road and A249 junction by replacing the existing “dumbell” junction with a two-bridge flyover. This would be similar to what is being proposed for M5 J12 & M5 J14 albeit it is not a Motorway. This confirms our concerns that the costings provided in the IDP Addendum are grossly underestimated.
- 5.8. With regards to the A38 corridor package of improvements the cost calculation is set out as being:
- Half of midpoint cost of the transport scheme from the LTP or TFR / total allocated housing numbers within the cluster = cost per unit
- 5.9. As previously discussed, this estimation relies on the costs in either the LTP or TFR being correct; **we question these costs given the broad ranges provided. Furthermore, the above approach only appears to apply to allocated housing numbers; it seems to disregard allocated employment which in the case of PS36 Sharpness the 10 hectares of employment will have a significant impact on traffic flows along the A38 corridor and at M5 J14.**
- 5.10. The IDP acknowledges that in addition to the concerns raised by GCC in relation to the traffic impacts on the highway network from PS36, they also have concerns about the feasibility of reopening the Sharpness Branch Line and the reliance on this as part of the applicant’s mode share assessments. This is well founded given the response from Network Rail to the applicant for PS36 in relation to the Sharpness Branch Line Study which makes it clear that:
- The costs would be well into the “tens of millions of pounds” to reinstate passenger services on the branch line;
 - The operation feasibility with respect to timetabling and train paths is questionable and would need to take account of mainline service enhancements which would include the half-hourly uplift to the local service between Bristol and Gloucester planned for 2023;
 - Significant infrastructure interventions would be needed at Gloucester Station which would be costly; and
 - No strategic or economic case has been produced and no engagement with a train operating company.
- 5.11. This confirms issues of affordability and deliverability of the scheme; it cannot be relied upon as being feasible and given the likely costs of the scheme it is unlikely to be viable when considering the limited benefits (only trips to/from Gloucester city centre) relative to the substantial costs involved. This is echoed in the Rail Service Viability Statement of Opinion for GCC included with GCC’s Reg 19 representations, which concluded that **“The scheme does not currently have a compelling business case. It requires an investment of**

² <https://www.kent.gov.uk/roads-and-travel/road-projects/planned-road-projects/A249-Grovehurst-Road-and-Key-Street>

£34.85m and the resulting service will require subsidy on an ongoing basis.... It is our opinion that, based upon the current situation, that there are considerable risks to this scheme which make it unlikely that it would gain the necessary approvals for the scheme to progress to delivery."

- 5.12. Notwithstanding this, further evidence in the Network Rail Bristol–Birmingham Strategic Rail Study (June 2021) strongly indicates that main line train paths do not exist to provide a rail service from Sharpness. Deliverability of rail infrastructure or service to support PS36 at Sharpness is exceptionally questionable. **The increase in train frequency planned for the mainline effectively rules out any remote chance of the Sharpness promoters rail strategy being capable of being delivered, even if it was viable.**
- 5.13. At 3.6 the IDP Addendum confirms that the traffic modelling has shown that the new settlement at Sharpness (PS36) would result in capacity issues on the A38 and at M5 J14 which would require highway mitigation; these are listed below:
- A38 / B4066 (ID17) – junction signalised
 - A38 / B4066 Berkeley Road (ID19) – junction signalised
 - A38 / Alkington Lane (ID21) – junction signalised
 - B4066 / Station Road (ID22) – widening on B4066 approach
 - A38 / A4135 (ID23) – widening on A38 northbound approach
 - B4066 / Alkington Lane (ID30) – junction signalised
 - M5 Junction 14 (ID25 & ID26) – new grade separated all movements interchange
- 5.14. **From the above it is clear that significant highway mitigation is needed to accommodate the additional traffic from the strategic allocation at Sharpness.** Additional mitigation to that shown may be required given that the traffic modelling has assumed a greater reduction in traffic to sustainable modes than what would likely occur given the lack of sustainable travel opportunities with regards to both bus and rail public transport.
- 5.15. It is noted that the IDP Addendum acknowledges that the B4066 and Alkington Lane which links the PS36 site allocation to the A38 Bristol Road is not sufficient to support the levels of growth proposed in the Local Plan Review; improvements to these corridors would therefore be needed in the short-term to enable them to accommodate any significant development in this location. It is also noted that land acquisition either side of Alkington Lane at its junction with the A38 (ID21) would be required to deliver the ‘major’ mitigation proposed at this junction which the traffic modelling has shown to operate well in excess of its capacity.
- 5.16. Appendix A provides the following list of the transport and highway schemes which the Sharpness (PS36) allocation is expected to contribute to:
- Gloucester to Sharpness walking and cycling improvement – £1,045,296
 - Sharpness Branch Line and New Station – £1,111,111
 - B4066 / Station Road Junction Improvements – £52,265



- B4066 / Alkington Lane Junction Improvements – £555,556
- Contributions towards M5 Junction 14 Mitigation Package – £1,851,506
- Contributions towards A38 Corridor Mitigation Package – £1,078,048

- 5.17. The highway schemes are those listed above with the costings and apportionment set out in the FDP (EB109) for which separate commentary has been provided.
- 5.18. For the Sharpness Branch Line and New Station scheme, a figure of £1.11m has been identified as the contribution from PS36, with a further £0.39m from Sharpness Docks (PS34); this amounts to approx. £1.25m to secure this infrastructure. This is nowhere near the “tens of millions” suggested by Network Rail or the £34.85m identified in GCC’s Rail Service Viability Statement of Opinion. This questions the deliverability of the scheme; without it the development at Sharpness (PS36) can be considered unsustainable, a point made by GCC in their Reg 19 representations which concluded that ***“the development is unsustainable when considered against the policies outlined in both the NPPF and Stroud District Local Plan.”***
- 5.19. **The updated transport evidence and the Reg 19 representations provided by GCC in response to Sharpness reinforces our previous representations that the Sharpness Branch Line is unlikely to be deliverable, affordable or rational.**
- 5.20. To avoid the soundness of the Local Plan being compromised, **it is considered imperative that a realistic appraisal of the costs for transport infrastructure required to deliver the Local Plan Review growth is undertaken to establish the realistic prospects of this being funded and delivered within the plan period.**

6. EB112 SALA Accessibility Scoring Note (August 2022)

EB112a SALA Transport Accessibility Assessment November 2020

EB112b SALA Transport Accessibility Assessment October 2019

EB112c SALA Transport Accessibility Assessment July 2018

- 6.1. Comments: Which sites or policies do our comments relate to:
- Policy PS36 Sharpness
- 6.2. The SALA transport accessibility assessment of residential and mixed-use sites has informed the Sustainable Appraisal (SA) with regard to SA Objective 10 – ‘to ensure that air quality continues to improve’.
- 6.3. The SALA transport accessibility assessment of individual sites is based on their proximity to town/district/local centres, employment sites and services and facilities that people may be required to access on a regular basis. The scoring assumption is that a lower score indicates a shorter journey time and therefore lower likely emissions from traffic.
- 6.4. The assessment however is solely based on existing facilities, it does not allow for local facilities such as schools, employment or local centres that are proposed to come forward either on-site or in close proximity. Furthermore, the assessment has only measured to existing bus stops and does not take account of possible highway and transport improvements as part of development proposals; this includes new enhanced public transport services.
- 6.5. With respect to public transport, the assessment does not take account of the frequency or range of bus services offered. A regular 15-minute bus service is treated the same as one which operates once a week. Sites within easy reach of a relatively frequent service offering a very wide range of journey destinations are in effect treated in the same way as one that has a minimal level of service. Furthermore, a maximum walk of 400m to a bus stop has been used with no assessment of a site’s proximity to existing and potential high quality public transport. This precludes most sites and creates an assessment whereby a site remote from existing public transport will appear equally as good as a site close to (but greater than 400m) of a frequent bus service.
- 6.6. The range of employment, retail and other local facilities are also not reflected in the assessment. It is obvious that the larger urban areas provide a greater range of employment and other services. No weighting has been applied in the assessment.

Summary

- 6.7. **The methodology and scoring of the SALA Transport Accessibility Assessment is simplistic and has a number of flaws as identified above; it therefore cannot be relied on in a meaningful way to provide a reasonable basis for assessing a site's credentials with respect to its transport accessibility.**

- 6.8. **As set out elsewhere in representations, Sharpness is in a remote location some significant distance from the main movement corridors and major centres of employment. The new rail service cannot be guaranteed and the commercial case to provide a relevant bus or coach-based public transport service is in question. With respect to its transport accessibility, Sharpness cannot compete with sites that are located close to the main movement corridors as identified in the STS, where improvements to facilitate travel by alternative more sustainable modes of transport would be much more readily achieved, and which are favourably located in relation to employment destinations including Stonehouse, Stroud and Gloucester.**

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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