



To: Sent via e-mail.

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Our Ref: 2024/09/SDC-LPR-EPTEC/AD

Your Ref:

Date: 21 October 2024

Dear Sir/Madam,

Stroud District Council - Local Plan Review - Examination Pause Technical Evidence Consultation 2024

Thank you for consulting Gloucestershire County Council (GCC) on this matter.

Officers from various services areas have reviewed the consultation materials, and discuss areas of transport, employment, education, air quality, health and wellbeing among other things.

The officer-level response is presented in three parts:

- Part 1: Response to Consultation Questions
- Part 2: Further responses (Transport)
- Part 3: Further responses (other service areas)

This response is accompanied by two annexures (attached).

Detailed GCC officer-level comments are shared below.

Yours faithfully,

Amartya Deb
Senior Planning Officer (Infrastructure)
Gloucestershire County Council

DETAILED OFFICER COMMENTS

PART 1: RESPONSE TO CONSULTATION QUESTIONS

Transport Planning and Highways Development Management

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

Response relating to:

[EB133c - Design and Costing M5 Junction 12 Stage 2 Optioneering Report;](#)

[EB133a - Design and Costing M5 Junction 14 Report;](#)

[EB133b - Design and Costing M5 Junctions 12 and 14 Funding Overview](#)

GCC officers welcome the additional evidence provided in terms of the M5 Junction 12 Feasibility Study. However, officers would be keen to see the outputs of the next phases of work (business cases) before a decision is made on which scheme option is taken forward. The options being proposed as possible solutions, do conclude that an effective solution can overcome the junction capacity constraints, but the potential solutions ('options') vary in design and cost and at this very early stage in scheme design it is not possible to confirm which option (or even a future variant of the options) will perform best.

Regarding the funding strategy, GCC officers acknowledge that some of the concerns raised previously are now addressed. Officers realise the challenges of finding the funding for the transport mitigation required for a Local Plan that requires motorway junction improvements in two different locations. Relying on funding a significant proportion via Government may be challenging, especially with the spending review currently underway by Government. GCC officers remain concerned about the scale of the total funding that needs to be raised to deliver two motorway junctions, but is happy to continue working with SDC to build on previous experience of seeking contributions from development for large scale infrastructure improvements to strengthen the Stroud Local Plan policy position on this issue. GCC officers' experience suggest that it may be possible with public sector funding for one of the junctions to come forward in the plan period, subject to Government (RIS or other) funding coming forward, but it would be extremely unlikely for both, unless there was a fundamental change in the Government's approach to road investment.

GCC would also like to note that funding is not only required to mitigate the impact on the motorway, but there will also be significant impacts on the local road network which will also need to be mitigated. These local road network impacts were identified in the original modelling; however, they have not been confirmed through the work on the M5 J12 Feasibility Study and this work will need to be updated and costed as part of any future stages of work.

GCC would like to work with Stroud District Council to include in a statement of common ground, an agreement to work together to ensure the policies in the Local Plan enable the developer contributions required for J12, 14 and the local road network to accrue and be recovered over a longer period.

- ❖ Q1b. In order to assist the examination, the Inspectors would like a summary of your comments to Q1a (Please do not exceed 250 words).

The additional evidence concludes that an effective solution to overcome the junction capacity constraints at Junction 12 can be achieved. However, at this very early stage in scheme design, it is not possible to confirm which option (or even a future variant) performs best.

Regarding the funding strategy, GCC officers acknowledge that some of the concerns raised previously are now addressed. As stated above, GCC officers remain concerned about the scale of the total funding needed for two motorway junctions but is happy to continue working with SDC to strengthen the Stroud Local Plan policy position on this issue. GCC officers' experience suggest that it may be possible for public sector funding for one of the junctions to come forward in the plan period, subject to Government funding coming forward, but it would be extremely unlikely for both, unless there was a fundamental change in government's approach to road investment.

GCC officers would like to note that funding is not only required to mitigate the impact on the motorway, but also on the local road network. These local road network impacts were identified in the original modelling; however, they have not been confirmed through the work on the M5 J12 Feasibility Study and this work will need to be updated and costed as part of any future stages of work.

GCC officers would like to work with Stroud District Council to ensure the policies in the Local Plan enable the developer contributions required for J12, 14 and the local road network to accrue over a longer period.

- ❖ Q2a. Are the proposed works to M5 Junction 14 effective and do they overcome the junction capacity constraints to local plan growth?

GCC officers are glad to see additional evidence provided for Junction 14 on the M5 and are happy to continue to cooperate on finding a solution for this junction with SDC, neighbouring authorities and National Highways. However, given that this junction is outside Gloucestershire's administrative boundary and on highway infrastructure which is the responsibility of National Highways, GCC officers will not comment in detail on the proposed engineering solution or costings.

GCC's comments regarding the cost apportionment are as per the reply to Q1a.

- ❖ Q2b. In order to assist the examination, the Inspectors would like a summary of your comments to Q2a (Please do not exceed 250 words).

n/a

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

Response relating to:

[EB134 - Housing Delivery;](#)

[EB134 - Appendix 1 Housing Delivery;](#)

No comments proposed.

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

n/a

- ❖ Q4a. Do you have any comments on the junction scenarios impacting housing delivery presented in EB135 M5 Junctions 12 and 14 scenarios?

Response relating to:

[EB135 - M5 Junctions 12 and 14 Scenarios;](#)

[EB135 - Appendix 1 M5 Junctions 12 and 14 Scenarios](#)

GCC officers are unable to confirm the assumptions in this document until officers see further evidence.

- ❖ Q4b. In order to assist the examination, the Inspectors would like a summary of your comments to Q4a (Please do not exceed 250 words).

n/a

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

Response relating to:

[EB136 – PS36 Sharpness New Settlement;](#)

[EB136 Appendix 3 – Sharpness Branch Line SOC;](#)

The additional rail evidence submitted concludes that revenues will not offset scheme and operating costs for options A and B and all 3 options presented will offer poor value for money, although the Benefit Cost Ratios (BCRs) are not shown.

The Strategic Outline Case does not address the feasibility of incorporating new or diverted services and extended journey times into the strategic timetable structure of the Bristol-Gloucester-Birmingham Main Line, or their performance implications.

On the 15th Jan 2023 GCC supplied to SDC a joint letter from Great Western Railway (GWR) and Network Rail (attached as **Annexure 1**). This letter, dated 27th November 2023, states:

“Our view is that the Sharpness proposal is unlikely to be compatible with the recommendations for future service development, specifically additional trains between Bristol and Gloucester. We would expect additional services between Bristol and Gloucester to be more beneficial than services between Sharpness and Gloucester.

Currently the proposal has the status of an unfunded aspiration that does not feature in industry strategic or investment plans. We are very pleased to work with promoters of railway improvements, but this does not confer support for proposals nor confidence that a case can be made.”

GWR and Network Rail have been consulted on the additional Local Plan evidence and provided an updated position in a letter dated 30th September 2024 (attached as **Annexure 2**), which states that:

“Having reviewed the SOC, it is very clear that there is no strong financial case for any of the heavy rail options considered, with operational costs outweighing revenue in all scenarios. This is without factoring in capital expenditure costs, which would be significant if the preferred South Chord option were to be taken forward. There are also some important omissions when considering the economic case. The document notes that further work is required to look at operational issues at Gloucester to understand how services could be fitted into the timetable. Addressing this may well require further infrastructure, which has not been factored into this SOC. Signalling changes have also not been included in the appraisal.

With no identified funding strategy, other than seeking to add the scheme to the national Rail Network Enhancements Pipeline, and bearing in mind the current economic situation, it is difficult to see a scenario in which any of the heavy rail proposals would be a viable proposition. It should be worth noting that the current national pipeline is oversubscribed with projects that do deliver viable solutions to challenges.”

In summary, the letters conclude that the Sharpness proposals are poor value for money and are unlikely to be compatible with future service development on the Bristol-Birmingham Main Line which has complex inter-relationships with other

routes and is highly utilised by GB-wide passenger and freight services. It is unlikely that Sharpness alone can justify wholly new rail services or extended journey times on existing services, or the infrastructure required to meet these. It is hoped that SDC will concede to the rail industry's clear position concerning the prospects of future passenger rail at Sharpness, in order to focus Inquiry time on more realistic alternatives.

The Strategic Case reports, but does not develop, other mode options higher in Stantec's feasibility ranking than the rail options.

GCC commissioned a separate analysis of the additional evidence submitted, which can be made available on request. It concludes that this Outline Business Case does not pursue the highest ranked strategic options but instead focuses on railway solutions, all of which by the current assessment offer poor value for money. There appears to be little prospect of increasing passenger demand or revenue but a high probability that, as more work is undertaken construction, operation and opportunity costs will significantly increase. The case is not compelling for support from Network Rail, the Department for Transport or the wider rail industry.

Response relating to:

[EB136 Appendix 4 – TN03 – Updated Research on Mobility-as-a-Service;](#)

Regarding the additional evidence provided on Mobility as a Service (MaaS), it has to be understood that MaaS is about integrating existing sustainable transport solutions. It does not increase the sustainable transport offer or provide additional funding for it and this site has no services to integrate. GCC officers do not see the benefit of MaaS as a proposal without the latter. Furthermore the examples given in the additional evidence provided do not translate to the Sharpness geography and/or are not viable without substantial public sector subsidy.

Response relating to:

[EB136 – PS36 Sharpness New Settlement;](#)

[EB136 Appendix 1 – TN001-M5 J14 VISSIM;](#)

[EB136 Appendix 2 – TN002 Trip Gen;](#)

[EB136 Appendix 3 – Sharpness Branch Line SOC;](#)

[EB136 Appendix 4 – TN03 – Updated Research on Mobility-as-a-Service;](#)

[EB136 Appendix 6 – Update to M5J14 Technical Notepost NH consultation](#)

GCC officers have a number of observations regarding the highway impact and additional modelling for the Sharpness development. These were sent to SDC in October 2024 and are summarised below:

We note that the modelling assessment focuses on the impact of 1,000 dwellings at M5 Junction 14. However, in the document ([EB135 - M5 Junctions 12 and 14 Scenarios](#)), the housing delivery trajectory summary states that there could be two options for the equivalent impact on the M5 Junction 14, one option is that the Sharpness interim scheme can be delivered up to 1,000 units and all other sites with an impact on M5 J14 do not come forward, and the other option is to account for the

equivalent impact on the M5 Junction 14 first come, first served basis from a range of sites. We therefore expect a 'tipping point' be identified for housing delivery prior to any mitigation at M5 junction 14. We would also expect a cumulative impact assessment for all of the allocation sites in the emerging Stroud Local Plan to be undertaken. Furthermore, GCC officers would have liked to see M5 Junction 13 included in the assessment. We are also concerned about the impact on the local road network.

It seems that there is a conflict between the proposed delivery of 1,000 houses by 2032 by the site promoter and the anticipated number of 595 houses to be built by 2031/32, 815 houses by 2032/33 and 1,035 houses by 2033/34 showing in EB135 Appendix 1.

GCC officers consider the vehicular trip rate estimates for the Sharpness site to be relatively low in comparison to the trip rates used in the Traffic Forecast Modelling in support of the Stroud Local Plan and the internalisation factor of 18% quite high, in contrast to the internalisation factor of 10% that was used in the Traffic Forecast Modelling.

TN001 assumes that more public transport options, including express bus/coach services to key employments, would be available to Sharpness residents travelling further to Bristol and/or Gloucester, resulting in an increase in trips to work by public transport and a subsequent reduction in car trips. GCC officers are not convinced that viable public transport services that offer a real alternative to the car can be realistically achieved at this location and are therefore concerned that such an assumption, as well as the low trip rate estimates and high internalisation factor, would likely underestimate traffic impact by car on the highway network.

Response relating to:

[EB136 Appendix 5 – TN001 – Update to Sharpness Vale DRT- Coach Services;](#)

GCC officers feel that the assumption that bus/coach trips to work can be increased from 6% to 15% (as per Table 5.2 in TN001) is unrealistic. In particular, the remote location of Sharpness means that bus proposals cannot credibly compete against private car and that DRT loses effectiveness as range extends and number of destinations increase, and benefits decrease as availability falls.

GCC officers are also concerned about the financial case for the coach services proposed. The proposed hourly service relies on residents wanting to travel at the same time which is unrealistic in practice. Simply adding a vehicle adds costs faster than revenue and there is no explanation for what the "additional buses 2 and 3" offer. GCC officers are therefore concerned that any public transport connection to the settlement would require significant on-going revenue support in the long term.

Please also note additional comments made by the Integrated Transport Unit (ITU) in **Part 2 of this response.**

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

The rail Outline Business Case does not pursue the highest ranked strategic options but instead focuses on railway solutions, all of which by the current assessment offer poor value for money. There appears to be little prospect of increasing passenger demand or revenue but a high probability that, as more work is undertaken, construction, operation and opportunity costs will significantly increase. As stated above, the case is not compelling for support from Network Rail, the Department for Transport or the wider rail industry.

GCC officers consider the vehicular trip rate estimates for the Sharpness site to be relatively low and the internalisation factor of 18% quite high. Similarly, GCC officers feel that the assumption that bus/coach trips can be increased from 6% to 15% is unrealistic. In particular, the remote location of Sharpness means that bus proposals cannot credibly compete against private car and that DRT loses effectiveness as range extends and number of destinations increase, and benefits decrease as availability falls. GCC officers are concerned that such service would require significant on-going revenue support in the long term.

GCC officers are of the opinion that the public transport solutions proposed are more akin to an on-demand private hire service to employment centres, than a genuine public transport offer. It is not clear how this would be funded.

GCC officers are not convinced that viable public transport services (by rail or bus) that offer a real alternative to the car can be achieved at this location and is therefore concerned that such an assumption, as well as the low trip rate estimates and high internalisation factor, would likely underestimate traffic impact by car on the highway network.

- ❖ Q6a. Do you have any comments on the costings provided on behalf of both landowners to deliver the proposed M5 pedestrian and cycle bridge crossing?

Response relating to:
[EB137 - PS37 Wisloe New Settlement](#)

No comments proposed.

- ❖ Q6b. In order to assist the examination, the Inspectors would like a summary of your comments to Q6a (Please do not exceed 250 words).

n/a

(Part 2 in the next page).

PART 2: FURTHER RESPONSES (TRANSPORT)

Integrated Transport Unit

[EB136 Appendix 5 - TN001 - Update to Sharpness Vale DRT- Coach Services](#)

The offer of MaaS (provided by Zeelo) as a solution to the public transport offer is not supported by Integrated Transport Unit (ITU) officers. Zeelo offer a simple brokerage system which relies on local transport providers delivering services based on demand. There are questions as to whether this offers a genuine public transport solution or is more akin to an on-demand private hire service to employment centres. MaaS as a concept is the integration of multiple travel modes into a single, simplified ticketing scheme. This offer does not achieve that and achieving MaaS would not offer a solution to the lack of public transport in the area. The revenue projections for the Zeelo offer appear to be extremely ambitious and far beyond what the sector has experienced on similar schemes. The annual and on-going revenue support required for this would be very significant.

To connect the proposed development with the key locations (Bristol, Stroud and Gloucester) would require significant ongoing revenue support for new or extended bus services. This may include demand-responsive bus services but would also require timetabled bus services. Revenue expectations for these services is not high, annual subsidy support for the necessary bus services would likely be in the high hundreds of thousands, based on 5 vehicles across 3 services (2 vehicles each serving Bristol and Gloucester, 1 vehicle serving Stroud).

The remote location of the site means transport operators experience a lot of 'dead mileage' which pushes up the cost, reducing sustainability. The complex network of destinations also reduces opportunities for synergy. The lack of feasible comprehensive public transport options for all destinations means car ownership will be high, in turn this further reduces potential revenue on bus services and further reduces long-term sustainability. Based on the experience of officers in the ITU, regardless of the delivery mode, it is highly likely that permanent significant revenue support will be required to deliver public transport.

(Part 3 in the next page).

PART 3: FURTHER RESPONSES (OTHER SERVICE AREAS)

Archaeology

GCC officers have no further comments to make.

Climate Change

[EB133a - Design and Costing M5 Junction 14 Report;](#)

An Air Quality Assessment is encouraged. It would be beneficial to see a reference to future EV fleet projections and particulate matter implications; and reference to all residential receptors including any live planning applications in the vicinity that are yet to be decisioned.

[EB134 - Housing Delivery](#) & [EB134 - Appendix 1 Housing Delivery](#)

Stroud currently has good air quality with no declared Air Quality Management Areas (AQMAs) -- typically these areas exceed national air quality limits. However, there are areas where nitrogen dioxide levels are more elevated than others, with Merrywalks, where development is proposed, being one. Consideration for how air quality will not worsen with development would be favourable.

[EB135 - M5 Junctions 12 and 14 Scenarios](#) & [EB135 - Appendix 1 M5 Junctions 12 and 14 Scenarios](#)

No comments.

[EB136 - PS36 Sharpness New Settlement](#) & Appendices 1-6

No comments.

[EB137 - PS37 Wisloe New Settlement](#)

As stated before, Stroud currently has good air quality, with no declared AQMAs. It is reassuring to see the Wisloe Design Code has been referenced throughout plans, with this Design Code detailing active travel and building measures which will help maintain good air quality. With a large proportion of the development being proposed along main roads and in the light of human health implications from exposure to poor air quality, this Design Code reference is supported. Further regard for employment cycle provision is requested, as this is not sufficiently addressed in the Design Code or PS37. Employment development would benefit from shower and dry room facilities to make walking and cycling as a method of staff travel desirable.

With regards to climate change and buildings, I am unable to identify reference to climate and building design within PS37 or the Wisloe Design Code. It would be good to see how building design will address carbon concerns during both construction and throughout the lifetime of the development, notably in light of Stroud's 2030 carbon neutrality target. In a similar vein, wood burners are not encouraged.

Economy

[EB136 - PS36 Sharpness New Settlement](#)

[EB137 - PS37 Wisloe New Settlement](#)

Considering some of the detailed assessments of the [Stroud Employment Land Study 2021](#), it is important to note that market experts have pointed to continuing disruptions that may influence employment land supply and commercial real estate.

Forecasted projections for future employment use classes and the possibility of additional onshoring or re-shoring of manufacturing activity at the national level can cause uncertainty. Expert local agency views can be sought on a site-by-site basis to ensure positioning of market mix and use classes remain realistic and best suited to the locality, including for site access, and likelihood of quality employment and use demand.

In planning for residential growth to occur, the District Council should also plan for sustainable employment. GCC officers welcome further allocations of employment land on the Sharpness and Wisloe settlements. Stroud has a lot of investments, creating manufacturing business base (both major companies and an extensive SME engineering base, many of whom are in the supply chains) as well as the growing emerging energy generation and green tech businesses. There are major plans for the reuse of Oldbury Power station and there is likely to be some supplier chain opportunities for other industries to locate in the Severn Edge area, in addition to Berkeley site. Considering these, employment land on Sharpness and Wisloe sites can be attractive for new business growth.

Both at county and district level there is a strong inward investment pipeline, despite Covid disruptions. The Stroud Employment Land Study 2021 notes that growth exceeded previous forecast projections. A recent inward investment project set to create 100 new advanced engineering jobs noted that, although location preference of employers was Bristol, due to the unavailability of suitable large clean industrial units, other locations within South Wales, Somerset and Gloucestershire have become alternatives.

Distance or proximity from the M5 is not the only critical factor for high quality investors. Investors also want to ensure strong connection to multiple urban locations via rail and mass transit. Good connectivity is important for engaging both locally and seeking specialist skills from national and international talent pools, and this may be an area to consider for these two settlements.

The Stroud Local Plan is comprehensive in this respect, but certain areas could be strengthened to enhance the district's economic vibrancy, especially through public art, public realm, investments, and cultural place-shaping.

Education

[EB136 - PS36 Sharpness New Settlement](#)

GCC officers note that there is a proposal to provide new primary schools on site at Sharpness Vale for pupils generated by 1,000 new dwellings. Financial contributions may also be required to expand an existing local secondary school and for home to school transport for eligible pupils.

[EB137 - PS37 Wisloe New Settlement](#)

GCC officers note that there is a proposal to provide a new primary school on site at Wisloe for pupils generated by 1,500 new dwellings. Financial contributions may also be required to expand an existing local secondary school and for home to school transport for eligible pupils.

Minerals and Waste Planning

GCC officers have no further comments to make.

Public Health

GCC officers welcome the opportunity to comment on the review of the Stroud District Local Plan on matters specific to the health and wellbeing of residents that live, work and take their enjoyment in Stroud District.

[Air quality, noise and vibration](#)

GCC officers welcome the recommendation within EB133a for an Air Quality Assessment to be conducted to identify air quality impacts of both the construction and operational phases of the proposed development on human health and ecological receptors. Air pollution has negative effects on health throughout the life course, from pre-birth to old age. The Plan should look to set out purposeful policies based around sustainability that should contribute to improving the air we breathe. Other district plans have proposed requirements for transport assessments and travel plans to demonstrate that developments do not exceed agreed thresholds and would encourage plan-makers to consider this approach in conjunction with the District Council, in particular with children in mind.

Children are especially vulnerable to dirty air. Evidence shows that there is a strong link between air pollution and the worsening of asthma symptoms, and it also plays a

part in causing asthma in some. Among children with asthma, those exposed to higher levels of air pollution suffer more frequent chronic respiratory symptoms. Research has shown that nursery and primary school children can be exposed to as much as 30% more pollution as a result of being smaller and closer to exhaust fumes when walking along busy roads, compared to adults¹. Furthermore, the propensity to walk and cycle has the potential to contribute to an improving picture of air quality across the plan area. Designing-in the 'habit for movement', drives further co-benefits to health including, reduced non-communicable diseases burden (cardiovascular and respiratory disease), injuries, and better mental health.

The recommendation within EB133a for plan makers to conduct a baseline noise survey and assessment in order to confirm any noise impacts of the proposed development are welcomed.

As a nation we are around 20% less active now than in the 1960's. If the current trend continues, we will be 35% less active by 2030. The health benefits of physical activity are well understood and can reduce your chance of type two diabetes (up to 40%), cardiovascular disease (35%) and joint and back pain (25%) [Physical activity guidelines: UK Chief Medical Officers' report - GOV.UK \(www.gov.uk\)](#). For further information on help to get communities and individuals more active, please see [We Can Move - Inspiring People To Get Active - Health and Wellbeing](#).

Housing

GCC officers welcome the Plan's approach, set out in EB136-PS36 and EB137-PS137, to both recognising the changing needs of housing over a life course and also ensuring that mix and tenure of housing provision will provide high standards of affordable, accessible dwellings, and that accessibility to the local facilities is a primary consideration.

Between 2018 and 2043 Gloucestershire's 65+ population is projected to experience the greatest growth, increasing by almost 71,000 people or 52.5% by 2043. Stroud District can expect to see upwards of 12,000 more residents aged 65 and over by 2043 (2018-2043)³.

Improving and maintaining the health of older adults is a strong social responsibility and the Chief Medical Officer's annual report 2023; Health in an aging society [Chief Medical Officer's annual report 2023: health in an ageing society - GOV.UK \(www.gov.uk\)](#) underlines the geography of older age in the UK. The report makes it clear that the increase in an aging population will be in our rural and semi-rural areas.

Place making

Neighbourhood design plays a significant role in shaping our health behaviours. Planners, developers and designers can shape an environment to either encourage physical activity or design out the need or ability to be active. As plans for placemaking in Stroud District, including plans for Sharpness and Wilsloe set out in EB136 and EB137-PS137 move forward, those creating the vision should be in no doubt that a well-designed place will have a positive impact on both the physical and mental wellbeing of residents and visitors alike.

The Office for Health Improvement and Disparities (OHID), Active Travel England and Sport England have produced an update of the Active Design guidance - [Active Design | Sport England](#) This guidance will support plan policies, structure and assist with developing master plans, pre-application discussions and support the wider public health, climate and biodiversity discussions. The [National design guide.pdf \(publishing.service.gov.uk\)](#) and the National Model Design Code and Guidance Notes for Design Codes illustrate how well-designed places that are healthy, greener, enduring and successful can be achieved in practice.

Strategic Planning

GCC officers have no further comments to make.