

## Response to Stroud District Council Local Plan Review June/July 2021

When a council has finished preparing a local plan it must be submitted to the Secretary of State. An inspector is then appointed to carry out an [independent examination](#). This will assess whether the plan has been prepared in accordance with legal and procedural requirements and if it is sound. The four tests of soundness are set out in the [National Planning Policy Framework \(NPPF\)](#).

### Soundness Tests Summary:

**Positively Prepared** - based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

**Justified** - the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

**Effective** - deliverable over its period based on effective joint working on cross-boundary strategic priorities

**Consistent** - Consistent with national policy

The following is a summary of BaSRAG's objections to - and observations on – **PS36 Sharpness new settlement**  
*Note: The underlined text in this document indicates a link to the source or relevant material.*

#### Area of concern: Infrastructure

Issue	Relevant area from test of soundness
<p><b>1. Cost of infrastructure</b>                      The high cost of infrastructure delivery is likely to make site PS36 not viable in the plan period. In the evidence base accompanying the Plan there are <b>no infrastructure spending plans</b> linked to the <a href="#">Community Infrastructure Levy, Section 106</a> provisions and other funding sources.</p>	Justified
<p><b>(2) Timing of infrastructure delivery</b>                      Early delivery of infrastructure, especially that related to transport, is critical to the delivery of PS36 according to <a href="#">Garden City Principles</a>. <b>There is no indication that infrastructure will be delivered early</b> in site development and that the proposed modal shift away from car use will be achieved. Indeed, wordings in policy such as “timely” and “at the right time” are vague and do not give confidence of a programmed delivery of infrastructure.</p>	Justified
<p><b>(3) Reliance on developer's promotional material</b>                      The Council has not undertaken its own studies for infrastructure provision and relies too heavily on the promotional material and studies undertaken by the promoters of PS36. Para 157 of the NPPF says it is ‘...<b>crucial Local Plans should plan positively for development and infrastructure in the area...</b>’. The lack of evidence in relation to transport and infrastructure reinforces concern that the Garden Village policy is not justified and effective</p>	Positively Prepared  Consistent

<p><b>(4) Late Evidence re Infrastructure</b>  The district council's <u>Infrastructure Delivery Plan</u> (IDP) and the <u>Local Plan Viability Assessment</u> have been produced at the end of this plan making process and appear to have been devised <b>to support a predetermined strategy rather than inform the plan making process</b>. Additionally, they are lengthy and difficult documents to comprehend and the public have not been given adequate opportunity to comment on them.</p>	<p>Justified  Consistent</p>
<p><b>(5) Lack of support from infrastructure providers</b>  Responses to the earlier consultations in the plan-making process from authorities/organisations involved in the provision of infrastructure <b>cast great doubt on the ability for the promoted infrastructure to be delivered</b>. These include responses from Stagecoach, Network Rail, Gloucestershire County Council and Wessex Water Authority.</p>	<p>Justified</p>
<p><b>(6) Transport Infrastructure</b></p> <ul style="list-style-type: none"> <li>• <b>Rail</b> - The Sharpness options <b>did not create significant economic value compared to other improvements tested</b>, particularly compared to the substantial capital costs involved. (<u>Gloucestershire Rail Investment Strategy</u>, March 2020)</li> <li>• One unsuccessful bid to the Restoring Your Railways Fund. A <u>second bid</u> awaiting decision.</li> <li>• Results of a Network Rail main line capacity study so far unpublished.</li> <li>• <b>Highways</b> - transport modelling has identified <b>seven capacity pinch points</b> within Berkeley Cluster.</li> <li>• Also identified capacity issues at M5 j13 and j14.</li> <li>• Considerable mitigation would be required to overcome highway capacity issues. So far uncostered and not agreed by the developer.</li> </ul>	<p>Justified</p>
<p><b>(7) Flood Risk</b></p> <ul style="list-style-type: none"> <li>• The <u>Stroud Flood Risk Assessment</u> (FRA) May 2021 (appendix P, page 74 et seq) indicates that there are <b>unknown detailed factors in connection with flood risk</b> at PS36.</li> <li>• A detailed site-specific FRA and surface water drainage strategy is required.</li> <li>• This should precede allocation as inclusion in a Local Plan is tantamount to giving outline planning permission.</li> <li>• Costs associated with flood risk mitigation are unknown and will add to the burden of development costs for this site.</li> </ul>	<p>Justified</p>
<p><b>(8) Education</b></p> <ul style="list-style-type: none"> <li>• The Stroud IDP Oct 2020 indicated the <b>high cost of education provision</b> at PS36 that adds to high development costs.</li> <li>• There is no policy requirement for early secondary school provision (only contributions towards) in PS36 despite local schools being full now.</li> <li>• The former Berkeley Vale College is perversely now allocated for development (PS35) despite being in use as a school still.</li> </ul>	<p>Justified</p>
<p><b>(9) Health</b></p> <ul style="list-style-type: none"> <li>• There are <b>no dental surgeries or secondary or tertiary care providers in the Berkeley Cluster</b> currently - all will need provision.</li> <li>• Sites PS33-36 will require at least £4.5m towards provision.</li> <li>• No social care facilities are being provided for - expectation is that the private sector will respond!</li> <li>• Nearest major hospitals to PS36 are over 20 miles away in Gloucester and Bristol</li> <li>• There are long lead times for provision of new health facilities.</li> </ul>	<p>Justified</p>

<p><b>(10) Green Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Open space &amp; green infrastructure provision estimated to cost £10.9m for sites PS33-36 <b>adding to high development costs and adding to questionable site viability</b></li> <li>• It isn't clear whether green infrastructure costs include mitigation costs for adverse effects on the Severn Estuary SAC/SPA/Ramsar site. Suggestion is that this will cost a further £1.7m</li> </ul>	Justified
---	-----------

**Area of concern: Transport**

Issue	Relevant area from test of soundness
<p>Transport has been recognised as one of the key risks for this development. In its <u>Infrastructure Delivery Plan, 2020</u>, the district council said:</p> <p><i>"The proposed allocations at PS34 Sharpness Docks and PS36 New settlement at Sharpness have an issue of <b>relative remoteness, particularly in public transport terms</b>. This increases demand for private car usage."</i></p> <p>In their (unsuccessful) bid to join the government's Garden Communities programme (see <u>Freedom of Information response</u>), the council and site promoters said:</p> <p><i>"...a new settlement of around 5,000 homes at Sharpness will require:</i></p> <ul style="list-style-type: none"> <li>• <b>A comprehensive pedestrian, cycle and public transport offer will be vital to ensure sustainable travel is a viable option for the proposed development.</b></li> <li>• <i>The level of traffic generation from the new settlement is likely to require <b>improvements to be made to existing local junctions</b> (to ensure safety and capacity requirements are met) and, especially with further growth, the need for <b>improvements to the strategic road network, i.e. the A38 and M5 junctions</b>".</i></li> </ul> <p>There will be three potential transport options for people wishing to travel to and from the new development: rail, bus and car.</p>	
<p><b>(1) Rail</b></p> <p>The council and developers have made the reopening of the Sharpness branch line to passenger services and the building of a new station the main focus of their transport strategy for the new settlement. However, there are serious questions about the viability of this proposal due to the following:</p> <p><b>(i) Potential routes</b></p> <p>Any routes would need to be northbound only as <b>the southbound link was closed in 1960 and would not be cost effective to re-open</b>. Therefore, anyone wishing to commute to Bristol, for example, would need to take a train from Sharpness and change at Cam &amp; Dursley station to then head south.</p> <p>In practice, this means commuters would need to get to the new station, then take the northbound journey to Cam &amp; Dursley taking between 10-20 minutes according to the site proposers, then wait for a connection south to Bristol. <b>Is this likely to be a realistic option – or will most people choose to commute by car?</b></p>	Justified

**(ii) Cost**

The council has costed out the project, but it has not made this information publicly available. It is likely that **the infrastructure and operational costs will be significant.**

The district council and site proposers acknowledge in their bid to join Garden Communities programme that:

*“The route is currently single track and would likely **require significant upgrade if frequent passenger services were to resume**”.*

This is supported by the Gloucestershire Rail Investment Strategy, which states:

*“Although the line already exists **significant work would be required to reopen the route to passenger traffic** including the construction of stations, upgrading of permanent way and signaling...”*

The sources of funding identified by Stroud District Council in its bid to the Restoring Your Railway fund are vague and under developed. As yet, **no substantial evidence has been provided to show how the project will be funded and delivered.**

In the Restoring Your Railway fund bid, the district council acknowledges that Gloucestershire County Council (GCC), one of the key stakeholders, in the rail project *‘...has raised concerns regarding the interaction of the growth point and the railway development. **Their concern is that the scheduled passenger trains may never arrive at Sharpness, or that, if they do, they would be too late in the development programme to achieve transformational change**’.*

The district council also notes that GCC *‘...have also suggested that the trains may need to be **subsidised for some years at the outset, as development is established.**’*

Likewise, Stagecoach, one of the country’s leading transport companies, said the following in a consultation submission:

*“Simply put, improved services and facilities on the railway through Stroud District lie **beyond the power of any local stakeholder to deliver, and there are no well-defined or funded rail industry plans at this time to bring any of the aspirations forward.***

**2. Bus**

Bus travel has also been identified by the site proposer as a key part of its public transport strategy for the new settlement. In their bid to the Garden Communities programme, the council and developers talk about rerouting and improving the Stagecoach 62 route

However, Stagecoach has raised major concerns about the new settlement proposal generally. It said in its consultation submission:

*“...We see **absolutely no realistic prospect of relevant public transport services by road or rail being deliverable to this area during the plan period...** This arises from **the fundamental limitations of a new settlement in a location** which.... is as remote as possible from major infrastructure and significant centres of population and economic activity, and lies well off-line of any existing or potential high-quality public transport corridor’*

Justified

<p><b>3. Car</b></p> <p>In their bid to join the government’s Garden Communities programme, the site proposers and district council acknowledge there are significant car transportation issues. They say:</p> <p><i>“...local road connections back to the A38 will <b>require substantial improvements early on in the development.</b>”</i></p> <p>It appears there are no plans to try to build the ‘missing link’ extension of the Berkeley bypass, which would join directly to the A38. This means road traffic would have to use the three existing routes. These are:</p> <p><b>(i) Bristol Road/Halmore Lane</b></p> <p>This route is set on a tricky junction at The Prince of Wales Hotel. Turning onto the road requires crossing over a fast A road, and exiting the area to head south is a dangerous turning with limited visibility due to the rail bridge.</p> <p><b>(ii) Berkeley Heath - B4066</b></p> <p>Entering the area via Berkeley Heath again requires the driver to cross the A38. The B4066 has soft verges which have caused a number of vehicle incidents, and has vehicle queues at its junctions during busy periods. This will be exacerbated further by HGVs travelling to and from new large distribution warehouses in Sharpness. Local residents have expressed concern for many years as to the volumes of traffic and the increasing size of vehicles using this section of road. There are no footpaths for pedestrians and bus stops are not set into laybys. This road is not able to support an increase in traffic and was already expected to exceed capacity by 2031 in Stroud’s <u>Local Plan Capacity Assessment</u>, 2014.</p> <p><b>(iii) Alkington Lane</b></p> <p>This route has been identified as a risk due to the soft verges and bends and there have been a number of accidents along this stretch of road. Although the road is narrow, HGVs are known to use this as a cut-through to the A38. Capacity is an issue. Queues of vehicles sit at its junction with the A38, and in common with the other routes into Berkeley, drivers are required to cross the A38 to access and exit the area. This junction was already expected to exceed capacity by 2031 in Stroud’s Local Plan Capacity Assessment.</p> <p>Further afield, junction 14 of the M5 is at capacity with long queues experienced during rush hour traffic. This new settlement, along with other large developments planned in the area, will put added pressure on this pinch point, as recognised by the site proposers and council in in their Garden Communities programme bid:</p> <p><i>“Growth proposals in South Gloucestershire and in Stroud District will rely on <b>significant new infrastructure including highway junction improvements at M5 J14, A38 and other roads within the strategic network.</b>”</i></p>	<p>Justified</p>

**Area of concern: Process**

Issue	Relevant area from test of soundness
<p><b>(1) Confusion over stages of the consultation process</b>            After consulting on four main possible strategies at the <u>Issues and Options</u> stage with supporting studies, a 'hybrid' strategy appeared in the <u>Emerging Strategy</u>, without the same level of supporting evidence.            While it would be more common to move from Issues and Options to Preferred Strategy and then Emerging Strategy, <b>a stage appears to have been missed out.</b> Instead we had a confusingly titled 'Preferred options consultation ("Emerging Strategy")' – almost an admission that the usual approach was being fudged.</p>	Justified
<p><b>(2) Lack of transparency</b>            Little discussion of how the 'hybrid' strategy was arrived at, and <b>lack of comparative Sustainability Appraisals against the original four main options.</b>            No detail of how the 'Top Five key issues' were selected from an original list of 40 in the Issues and Options paper.  <b>Many key reports not published in time for the various consultations</b>, or only available in draft form.            Descriptions of PS36 in Emerging Strategy relied entirely on the developers' marketing material.</p>	Justified
<p><b>3. Presentation of information confusing and opaque</b>            Diagrams and maps in all consultation documents made it <b>very hard to understand precisely where PS36 was to be placed.</b> Developers, on whom the plans for PS36 entirely relied, were <b>unable to provide any clarity at the public exhibitions</b>, struggling to explain the diagrams.  <b>Lack of cross-referencing</b> in consultation documents to evidence on which they rely.  <b>Key reports difficult to find</b> on Council website, often appearing on different pages without announcement.            Diagrams in the <u>Additional Housing Options</u> consultation show clearly the railway line from Sharpness, as if its existence was definite, and upon which judgements in that consultation could be made.</p>	Justified
<p><b>4. Lack of proper engagement with the public.</b>            For the <u>Final Draft</u> consultation, the council did not arrange a roadshow for Berkeley – despite a significant proportion of the overall Plan being built on its doorstep – until BaSRAG complained. <b>This turned out to be the roadshow with the greatest attendance in the district.</b>            Bare minimum of publicity given to consultation periods.            After two meetings with BaSRAG in the autumn of 2019, recognising them as a community group and promising regular updates and consultation, the the district council <b>dropped all proactive communications with them and only gave out information when chased.</b> Even routine advice of the Plan moving through the process were not received.  <b>Late publication of reports</b> without announcement made it almost impossible for interested residents to keep track of new evidence.</p>	Justified

<p><b>Confusing questionnaire</b> at the Emerging Strategy stage seems designed more to create statistics and drive residents down a preferred route to support the planners' case, rather than give them an open opportunity to express their views.</p> <p>At the <u>Pre-Submission Draft Plan (Regulation19) consultation</u>, residents only given the option of completing a lengthy online questionnaire or a technical Word document. The <b>draft version of this consultation document voted on by the council stated clearly there would be no questionnaire</b> and that residents could engage by letter or email. This was removed from the final document but only after it had been passed by the council.</p> <p>All of the above amounts to a deterrent to full engagement from the public.</p> <p>Minimal and declining level of engagement from the developers, despite the heavy reliance upon them in the various stages of the Plan. They have not engaged with BaSRAG since November 2019. When BaSRAG last checked their website (on 26 June 2021), <b>it had not been updated since 29 July 2020</b>.</p> <p>Their appearance at the exhibitions was marked by a complete lack of local knowledge, for example, the inability to explain the maps and diagrams (as above).</p>	
<p><b>5. Incomplete evidence base.</b></p> <p>Late publication of reports, as above, some after consultation periods had begun, again without announcement. This has happened again during the Pre-Submission Draft Local Plan consultation period.</p> <p>This leads to the belief that <b>throughout the studies were produced to justify the strategy rather than inform it.</b></p> <p>Absence of comparative Sustainability Appraisal (SA) of the 'hybrid' strategy described in Emerging Strategy.</p> <p>No Infrastructure Delivery Plan or Viability Assessment completed in advance of Emerging Strategy.</p> <p>Reliance on Developer promotional material for the Emerging Strategy phase, as above.</p> <p>Despite strong public support for two new potential growth points (PGP1 &amp; PGP2) in the additional housing consultation, this support was swept aside by the council.</p>	Justified
<p><b>6. Delays in producing consultation reports.</b></p> <p>Consultation reports were <b>only published at the beginning of the next consultation</b>, so no feedback received from the council until then. The exception was a statistical analysis published five months after the Emerging Strategy consultation, containing bland or dismissive responses to the main themes that the public had written about.</p>	Justified
<p><b>7. Issues with key information in consultation documents</b></p> <p>In the Issues and Options consultation document, access to services and facilities elsewhere was rated as <b>poor</b> for Berkeley and <b>very poor</b> for Sharpness, yet a year later in the Emerging Strategy consultation document, Berkeley had been upgraded to <b>good</b> and Sharpness was rated as <b>good</b>. There were no major changes to infrastructure and services in the area during this period.</p> <p><b>A swimming pool listed in Berkeley in the Emerging Strategy document.</b> The only pool in Berkeley is at the primary school. This is a small outdoor pool that can only be used in the summer months and has very limited public use. However, in the district council's <u>Settlement Role and Function Study</u>, the town is rated the same as Dursley and Stroud, which have large indoor pools in public leisure centres that are open all year.</p> <p>Both points above mean the Berkeley and Sharpness area <b>could be seen to have existing services and levels of access that would support a larger community.</b></p> <p>The council says in the Pre-Submission Draft Local Plan document that there will be a passenger train service and new station, but it has yet to supply evidence to show this will be viable. <b>When BaSRAG requested the council amend the document to say the rail</b></p>	Positively Prepared

plan is a possibility rather than a certainty, it declined to do so.

The council also says in the Pre-Submission Draft Local Plan that there will be a secondary school, but **does not make it clear when this will be delivered**. In the site promoter's Sharpness Natural Neighbourhoods brochure there is **no mention of a secondary school in the plans for phase one**.

**(8) Consultation periods and events – limited scope**

**(i) Scale and type**

The Local Government Association (LGA)'s best practice guide for consultations says:

*'There are lots of ways you can consult local people; the scale of which should be proportional to the potential impacts of the proposal or decision being taken'*

Given the potential impact of the plan on the Berkeley and Sharpness area, the council should have offered **more public consultation events in Berkeley and Sharpness** to give people the chance to engage with officers and developers.

The Pre-Submission Draft Local Plan consultation is due to last eight weeks. The LGA recommends consultation periods last between eight and 12 weeks. **The maximum amount of time should have been allocated for this consultation because it is an important stage of the Local Plan review process**. This would allow people to study the latest version of the plan, consider its implications for their local area and to make a better informed response.

**(ii) Accessibility and inclusion**

In its Statement of Community Involvement, the district council says:

*'We recognise that many members of the community are hard to reach or engage with, whether due to working hours, commitments, personal circumstances or disabilities. We will try to modify traditional consultation methods where appropriate to engage with such groups and individuals.'*

The single consultation event in Berkeley and Sharpness area for the *Issues and Options* stage was between **3pm and 6.30pm on Thursday 2 November 2017 in Berkeley**. There were no provisions made at this key stage for people who were working at that time or for those living in Sharpness, Newtown and surrounding villages (who will be hugely affected by these plans). Only 29 people attended the event. Just two out of the 80 people who responded to the council's online questionnaire for this consultation identified with the Berkeley area.

The Pre-Submission Draft Local Plan consultation is entirely online. The council should be running face-to-face public exhibitions/roadshows **to make the consultation more accessible and inclusive**.

Positively Prepared

**Area of concern: Employment**

Issue	Relevant area from test of soundness
<p><b>(1) Very limited employment opportunities</b>            The proposed plan does not adhere to the <u>Garden City principles</u> which state that there should be ‘...a wide range of local jobs in the Garden City within easy commuting distance of homes’.</p> <p>In their bid to join the government’s Garden Communities programme, the council and site proposers said <b>just 650 jobs would be created as part of the new development</b>.</p> <p>Key centres of employment (Bristol, Cheltenham and Gloucester) are at around 20 miles away. This means the majority of people living in the new development will have to <b>commute out of the area to work</b>.</p> <p>The district council evaluated the pros and cons of a new town near Berkeley and Sharpness in its <u>Core Strategy</u> paper in 2011. In this report, it said the area ‘...<i>would only ‘work’ sustainably as a location if there were sufficient onsite employment opportunities (in numbers and type of jobs) to enable genuine living and working within the community. The location is remote from any other major employment, retail or leisure hubs</i>’.</p>	Consistent
<p><b>(2) Wrong Geographical position for prospective employers/commercial enterprises</b>            The site is isolated. It is too far from Bristol/Gloucester and constrained by the River Severn on one side. There are <b>very limited public transport links and it is not close to the motorway network</b>.</p>	Justified
<p>4. <b>Aspirations for the employment land to be allocated for a knowledge-based business park are unrealistic</b>            In the future, businesses are more likely to be drawn to the new Cyber Central business park near Cheltenham and, more locally in Stroud District, the new Eco Park at Junction 13 of M5. The Eco Park will be better located and has the backing of green energy company Ecotricity.</p> <p>The alternative use is industrial warehousing which traditionally brings a very <b>limited number of jobs</b> per unit.</p>	Effective  Justified
<p><b>(5) No established developer/promoter</b>            The PS36 development is a partnership between Greensquare and Lioncourt both of whom are residential house developers/landlords with <b>no established track record in delivering commercial developments</b>. This is seen as a major shortcoming to establish the viability of the proposed scheme.</p>	Effective

**Area of concern: The Environment and Surroundings**

Issue	Relevant area from test of soundness
<p><b>(1) Efficient use of land</b>            PS36 and the other sites in the Berkeley area in the Local Plan cover more than 1,000 acres of green fields.</p> <p>This is not compliant with government's plans to <b>prioritise the use of brownfield land</b> or the district council's commitment to <b>build with the environment</b> in mind.</p>	Justified
<p><b>(2) Biodiversity/geodiversity</b></p> <p>The new settlement will be on green field land, which provide a <b>habitat for birds and other wildlife</b>. It will be close to the Severn Estuary Site of Specialist Scientific Interest (SSSI), Special Area of Conservation, Special Area of Protection and Ramsar site. There is evidence that increasing levels of development can have a <b>negative impact on grasslands, heathlands, woodlands, estuarine and coastal sites</b>.</p> <p>The SSSI extends down the mud flats of the River Severn as far as Thornbury, and this area should be included when considering the plan's soundness.</p> <p>The internationally important Slimbridge Wetland Centre is about a mile away. The <b>light and noise pollution</b> new new town would generate could have an impact on birds flying to and from this site.</p>	Justified
<p><b>(3) Air quality</b></p> <p>The remote nature of site will inevitably lead to a large increase in the number of car journeys, as people commute to work or travel to shops and leisure centres in neighbouring towns. This will lead to an <b>increase in CO2 emissions caused by vehicles using petrol or diesel</b>.</p> <p>Emissions from construction traffic would also be significant over the 30-year period of the development as the site is remote and only accessible by road.</p>	Justified
<p><b>(4) Water drainage, quality and waste</b></p>	Justified

<p>The site includes areas described as having a high probability of flooding. The nearby PS33 site includes land prone to flooding and development there could exacerbate flooding in PS36.</p> <p>Assessments are based on Environment Agency maps that currently do not take into account rising sea levels as a result of global warming.</p> <p>New housing is likely to require additional defences as flood mitigation. Any increase in hard engineering could negatively impact the ecology of the estuary.</p> <p>The district council's <u>Sustainability Assessment</u> (2021) <b>does not give any evidence that answer questions previously raised about the risk from flooding in PS36.</b></p> <p>Wessex Water has raised concerns about the plan in its consultation feedback. The utilities company says it has <b>no plans to improve sewerage treatment works</b> that would be required for the development.</p>	
<p><b>(5) Landscapes/townscape</b></p> <p>This green field development will have a detrimental impact on the natural landscape. It will be of such magnitude that it will <b>effectively join Berkeley with Abwell, Wanswell, Newtown, Brookend, Hinton and Sharpness.</b></p> <p>Any significant transport infrastructure improvements (for example road upgrades or extensions) may result in increased land take.</p> <p>A development of this scale will detract from Berkeley as an historic tourist centre which attracts visitors from across the world.</p>	Justified

**Area of concern: Precedent**

The Inspector will consider the Local Plan against tests of soundness, duty to cooperate and compliance with legislation. Those tests have been applied against Local Plan submissions across England and previous decisions and recommendations can be referenced for the Inspector's consideration.

Issue	Relevant area from test of soundness
<p><b>1. Process of selection</b></p> <p>The process of selection of strategic locations should be <i>evidence base &gt; strategy &gt; location selection</i>. The <b>absence of a complete evidence base for PS36</b> (even at Local Plan submission stage) shows this not to be the case.</p> <p>The Inspectors of the West of England Combined Authority Joint Spatial Plan said '<i>the evidence base failed to satisfactorily justify the identified locations for strategic development</i>' – one of their reasons to recommend the plan be withdrawn.</p> <p>The Inspectors of the <u>Uttlesford District Council Local Plan</u> recommended the plan be withdrawn, as there was a '<i>risk that the material seeks to justify the strategy rather than inform plan making.</i>'</p>	Justified

<p><b>2. Sustainability appraisals across the Plan</b>  Are the sustainability appraisals <b>robust and consistent</b>? Have they been reviewed when new sites are considered?  We consider there to be <b>inconsistency of assessment method</b> and <b>disparity in scoring</b> to historic appraisals.</p> <p>The Inspectors of the West of England Combined Authority Joint Spatial Plan recommended the plan be withdrawn as alternative locations had not been assessed <i>‘on a robust, consistent and objective basis’</i>.</p>	Justified
<p><b>3. Sustainability appraisal in relation to PS36</b>  The sustainability appraisal in respect of PS36 is based on the deliverability and inclusion of future infrastructure development, this is inconsistent with other appraisals.</p> <p>The Inspectors of the Uttlesford District Council Local Plan questioned just such an assessment strategy and expressed concerns about its robustness.</p>	Justified
<p><b>4. Transport solution – sustainability</b>  Is the transport solution proposed by the developers for PS36 capable of delivering a <b>sustainable solution</b>? The solution is primarily <b>based around commuting</b> and doesn’t adequately consider other scenarios.</p> <p>The Inspector of the Uttlesford District Council Local Plan was highly critical of the transport solution in their recommendation for withdrawal noting <i>‘to meet the needs other than employment, the future residents...would be without the sustainable transport options offered.’</i></p>	Positively prepared
<p><b>5. Transport solution – deliverability</b>  Where is the <b>evidence base</b> in relation to the transport solution? The Restoring your Railway Ideas Fund application was unsuccessful and Stagecoach, one of the largest providers of bus and train services in the UK, considers the transport plan to be <b>unviable</b>. PS36’s sustainability is in large part predicated on the transport solution yet there is an absence of evidence of certainty of deliverability.</p> <p>The Inspectors of the Uttlesford District Council Local Plan recommended the plan be withdrawn for reasons including that the evidence did not show <i>‘the level of detail sufficient to show that [the transport solution] is practical in principle.’</i></p>	Effective
<p><b>6. Strategic development via Garden Communities</b>  Is the plan <b>deliverable</b>? Have Stroud District Council appreciated the complexity and challenging nature of delivering a significant proportion of housing numbers via garden communities in concurrent developments? There are likely to be <b>delays</b> – in fact the <b>majority of existing housing build-out delay in Stroud is via large, strategic sites</b>. We believe that the plan does not meet the test of soundness in relation to compliance with the National Planning Policy Framework or ‘effectiveness’ as, while aspirational, it is critically not deliverable.</p> <p>The Inspectors of the Uttlesford District Council Local Plan strongly believed that the numbers projected in their area would not be delivered by the garden communities proposed and therefore housing requirement would not be met.</p>	Effective Consistent

**Area of concern: Assessment method**

Issue	Relevant area from test of soundness
-------	--------------------------------------

<p><b>1. Process of selection</b>  The process of selection of strategic locations should be <i>evidence base &gt; strategy &gt; location selection</i>. The <b>absence of a complete evidence base for PS36</b> (even at Local Plan submission stage) show this not to be the case. The <b>timing of reports</b>, for example the <u>Habitats Regulations Assessment</u>, does not support the appraisal and selection process but follows it.</p>	Justified
<p><b>2. Appraisal of existing communities in Berkeley and Sharpness</b>  Appraisals in relation to access for Berkeley/Sharpness delivered <b>different results</b> in 2017 (poor/very poor) and 2018 (good), despite <b>no change in circumstance</b>.</p> <p>Similarly, the <u>Core Strategy 2011</u> scoring delivered significantly poorer, and more realistic, scores than those of the assessments in 2017 onward. What is the different assessment method? <b>How are the latter scores justifiable?</b></p>	Justified
<p><b>3. Sustainability appraisal in relation to PS36</b>  PS36 considers sustainability in relation to the <b>built-out future solution</b>, assuming <b>certainty</b> of its infrastructure and delivery – this is inconsistent with other sites. The new sites are assessed on a mixed mode travel/access basis, which includes the proposer plan for access – how can this be compared with existing? The Sharpness proposal builds its accessibility exclusively on new sustainable transport provision, rather than the accessibility of Sharpness as it stands.</p>	Justified
<p><b>4. Testing of alternatives</b>  At the Options Stage of the Local Plan development only PS36 was added as a growth point - where were the <b>alternative sites</b> tested?  Against what are the sites being considered? Is it simply capacity to accommodate rather than suitability? Where is the comparable location in Stroud District to accommodate a 2,400 house (or even 5,000 house) development?  Have Stroud District Council demonstrated PS36 is an <b>objectively assessed</b> solution?</p>	Justified
<p><b>5. Testing of alternatives – Strategic Allocation</b>  The <u>Strategic Assessment of Land Availability (SALA)</u> (strategic allocation) has been undertaken across various periods – with each new assessment/proposal.  <b>Were previously rejected sites reconsidered?</b> Where is the consideration of <b>comparative merit</b>?</p>	Justified
<p><b>6. Transport assessment method - accuracy</b>  ‘Access’ in relation to transport in the <u>Settlement Role and Function Study Update (SRFSU)</u> considers only the travel time and not the availability/frequency of a service. A daily service which reaches a destination in 15 minutes may be perversely described as ‘good’ – is this an <b>accurate assessment method</b>? There is also a query in relation to the <b>methodology</b> against parish and not settlement, with <b>overrated results</b>.</p> <p>Stagecoach, the largest public transport operator in the area, has said ‘<i>so concerned are we with the methodology, that we have no confidence whatever in the SRFSU, with regards to sustainable accessibility</i>’.</p>	Justified
<p><b>7. SALA – Transport and Access</b>  The <b>deliverability</b> of the proposed transport solution for PS36 has <b>not been tested</b>. The SALA Transport Assessment did not appraise the actual deliverability of the public transport measures. Furthermore, it is based on the completion of a rail station and express bus routes, neither of which are included in the phase one solution by the Sharpness Vale promoter.</p>	Effective

Area of concern: Deliverability and construction

Issue	Relevant area from test of soundness
<p><b>1. Capacity of PS36 to deliver</b>            The SALA (2017) included in 'Potential sites' NEW002 land at Sharpness. 325.64ha gross with a <b>development potential of 1,425 houses (as assessed by Stroud District Council)</b>. It noted the following: <i>'The site is being promoted for up to 5,000 houses and 30ha employment but a <b>detailed assessment would be required to confirm this figure</b>'</i>            Where is the <b>objective assessment</b> to confirm this figure? How has the figure proposed by the Sharpness Vale proposers been accepted by the Council when it contradicts their own consideration?</p>	Effective
<p><b>2. Delivery rate</b>            Are <b>assumptions</b> made in the Local Plan as to <b>delivery rates realistic</b>? We don't believe so.            The Home Builders Federation, subject matter experts, have stated <i>'there are some delivery concerns in and around Sharpness'</i>. Similarly, on behalf of another residential developer, Boyer Planning believe the PS36 allocation is not supported by evidence to be sustainable or deliverable. Delivery trajectory is earmarked as <i>'unrealistic'</i>.</p>	Effective
<p><b>3. IS PS36 'deliverable' as defined by NPPF?</b>            The National Planning Policy Framework considers <b>deliverability</b> in relation to the <b>first five years</b> of a Local Plan. We believe the lead in times and delivery rates for the new settlement at PS36 are unrealistic as presented. It is <b>highly unlikely</b> homes will be delivered in the first five years of the Plan.            Independent research suggests the delivery timetable for large sites is unachievable – they are unlikely to provide delivery until six-seven years into a plan period.</p>	Effective Consistent
<p><b>4. Location negatively impacts on delivery</b>            The <b>isolated location</b> of PS36, the <b>limits of current infrastructure</b> and facilities will have a <b>negative impact</b> on construction and development viability. More <b>complex logistics</b> and construction will have a <b>programme impact</b> and <b>slow</b> delivery rates.</p>	Effective
<p><b>5. Reliance on housing on strategic sites</b>            The Local Plan relies on major strategic sites to deliver housing numbers for the district. Yet the <b>capability</b> of Stroud District Council <b>achieving house build out rates</b> on strategic sites is <b>questionable</b>.            Stroud District Council's own <u>housing delivery assessment (2019)</u> acknowledges <i>'Lower than required delivery rates....are attributable to delays to programmed delivery at major development sites'</i>.            There is nothing in the proposed Local Plan to counter this issue.</p>	Effective

<p>Sustainability could be compromised by the Plan's over reliance on strategic sites coming forward. It further places an inherent delivery pressure on site PS36 with no additional support for any shortfall.</p>	
<p><b>6. Reliance of PS36 on the capability of the site proposer</b>  Stroud District Council has created a link between PS36 as a strategic site and Sharpness Vale LLP as developer. <b>Is the development proposition reasonable?</b> It is supported by two residential developers/providers: Green Square and Lioncourt.  <b>Green Square</b> currently have 12,000 homes. PS36 is a significant increase and will represent a <b>sizeable proportion of a future portfolio</b>. Where is the <b>evidence</b> to demonstrate <b>capacity and capability</b>?  <b>Lioncourt Strategic's</b> largest site application for permission is 2,500 homes. There is no indication this has been decided in their favour. Where is the <b>evidence base of successful delivery to this scale</b>?</p>	<p>Effective</p>
<p><b>7. Viability of PS36</b>  Neither the <b>rail operation</b> nor its <b>construction</b> have been demonstrated to be <b>viable</b>. While the plan talks of operating a railway station there is <b>no explicit commitment to its delivery</b> – from Plan or Proposer.</p> <p>Employment opportunities will be limited within the development; <b>outward commuting will be necessary</b> but distance to employment areas is simply too far by bus. The location dictates a site which is <i>'inherently unsustainable'</i>.</p>	<p>Effective</p>