

Stroud District Local Plan Review Examination

Examination Statement on behalf of CEG and the Charfield Landowners Consortium

Representator number: 923

Matter 11: Infrastructure Provision and Viability

1.0 Context

- 1.1 CEG and the Charfield Landowners Consortium (CEG/CLC) control circa 70ha of land to the south of Charfield with South Gloucestershire. Lichfields, on behalf of CEG/CLC, has been promoting the Site for major development. There are a number of important cross boundary issues relevant to the emerging Stroud Local Plan and the proposed strategic allocations to the south of the district.
- 1.2 Our Client has for some years been promoting the Charfield site through the stalled sub-regional plans and the South Gloucestershire development plan process for residential led, mixed use development. CEG/CLC submitted an outline planning application (reference no. PT19/2452/O) for a mixed use residential-led development (all matters reserved, other than main points of access). It proposes development of up to 525 houses with employment land, a neighbourhood centre with floorspace for commercial/community uses and significant areas of open space.
- 1.3 The outline planning application remains undetermined. CEG/CLC is in continued discussions with South Gloucestershire Council (SGC) and National Highways regarding M5 Junction 14. CEG's consultant (Evoke Transport Planning Consultants Ltd ('Evoke')) established the Junction 14 Working Group (when employed by SYSTRA) in 2018 to advance discussions on strategic mitigation at the junction.

2.0 Matter 11a Infrastructure – general questions

Infrastructure and Developer Contributions – Core Policy CP6

Q1 The policy seeks 'to ensure that infrastructure will be in place at the right time to meet the needs of the District and to support the development strategy.'

- a ***The policy identifies the Council's broad intentions in achieving infrastructure provision, rather than setting out clear development requirements. What infrastructure is actually sought from development proposals or is this appropriately set out within other Plan policies including the site allocations? Can the Council clarify the purpose of the policy and how a decision-maker would use it when determining future proposals?***
- b ***As regards the reference to developer contributions, we are unclear as to exactly what the policy is seeking from development proposals? What contributions are actually sought and are these viable? Can the Council clarify please?***

c Overall, is the policy justified, effective and consistent with national policy?

- 2.2 Policy CP6 fails to set out how Stroud will ensure that infrastructure will be in the right place at the right time to meet the needs of the District and support the proposed development strategy.
- 2.3 The draft policy is too generic and broad. It provides no certainty or strategic vision for how the key infrastructure issues will be addressed. It needs to be clear in its purpose and explicit about what strategic infrastructure is required for the key allocations and by when.
- 2.4 These issues are also not adequately dealt with in the strategic site policies. For example, Policy PS36 (Sharpness New Settlement) does not even reference M5 Junction 14 ('J14') which, as the key allocation impacting the junction as per SDC's evidence base, is a significant omission. Policy CP6 needs to be clear in its purpose and provide a strategic overview from which the allocation policies can follow on from.
- 2.5 We do not consider Policy CP6 is sound. Without considering in further detail the cumulative impact of development on the highway network and the specific infrastructure to deliver those sites, this policy will not achieve sustainable development. It is therefore not considered to have been positively prepared in relation to the NPPF tests of soundness. We also consider the policy is not supported by sufficient evidence of effective joint working on cross-boundary strategic matters with South Gloucestershire and for this reason we also consider the policy is not justified or effective.

3.0 Matter 11b Transport

Q2 Have all essential transport infrastructure elements been identified and does the Plan adequately address these needs in its identification of the scale and location of proposed development? Has the preparation of the Plan been consistent with paragraph 104 of the Framework which states that transport issues should be considered at the earliest stages of plan-making?

- 3.1 The essential transport infrastructure required to facilitate major development such as Sharpness New Settlement has not been adequately assessed. The proposed allocations are reliant on the delivery of significant and costly highways interventions with no clear plan on delivery.
- 3.2 The Plan provides a strategic overview only, which is not based on the latest evidence. In assessing J14 impacts, SDC does not use National Highways' (NH) latest VISSIM model, despite this being available for a number of years. SDC is aware of the model and have had the opportunity to be involved in the Working Group but has not engaged consistently. This model should have been used in the early stages of plan making and an agreed position with all authorities concluded in terms of meeting the Duty to Cooperate but this is still absent.

Q3 In general terms will Core Policy CP6, the Infrastructure Delivery Plan (IDP) and other policies of the Plan, including allocation policies, ensure that necessary transport infrastructure will be delivered and in the right place and at the right time?

- 3.3 No, the Plan does not provide any certainty that the necessary transport infrastructure at J14 will be delivered, nor the timescales to facilitate development. The strategic site allocation policies omit any reference to J14 improvement works, despite SDC acknowledging their impact

on the junction. A cumulative impact assessment of such sites is key to understanding the transport infrastructure necessary to mitigate the impact of the SDLPR growth on J14, and it is essential that the latest model (NH's VISSIM model) is used. SDC must fully engage with the J14 detailed discussions in the same way the developers have.

- 3.4 The updated Infrastructure Delivery Plan (IDP) 2022 Addendum sets out the concerns of neighbouring authorities and NH in relation to J14. It references the latest Statement of Common Ground (SoCG) (October 2021) which states that the parties (NH and SGC) agree to work together to develop any further transport evidence to accompany the SDLPR during examination. However, no such evidence has been published, and there were no further details in the additional documents consulted on in October 2022. This approach is clearly inadequate and needs to be robustly handled through the Examination with an updated Statement of Common Ground setting out where SGC and SGC agree and disagree.
- 3.5 The issues surrounding J14 cannot be 'kicked down the road' for a later stage, leaving promoters in neighbouring authorities to address the impacts of SDLPR growth on J14 and the associated costs. An agreed position on the strategic upgrade to J14; how much this will cost; how the land will be assembled; how it will be funded; what level of growth can be sustained prior to a major upgrade; how the infrastructure relates to the site trajectories, are all key questions that remain unanswered. The Plan and IDP clearly cannot ensure the necessary transport infrastructure will be delivered in the right place and at the right time with so many unknowns.
- 3.6 The Viability Assessment Refresh Report (August 2022) further highlights the uncertainty regarding the deliverability of key transport infrastructure at J14. The junction is only mentioned once (para. 7.46) referencing uncertainty with regard to Buckover Garden Village. It is understood that this relates to the land requirements necessary for the J14 improvements as the promoters of Buckover Garden Village, Tortworth Estate / St Modwen, own three quarters of the land surrounding the junction. From our reading there is no certainty provided through dialogue with the landowner / promoter that this land will be available.

Q4 Will the mitigation measures identified be sufficient to address the highway impacts identified?

- 3.7 If the full upgrade of J14 is implemented, this will be sufficient to mitigate the impacts.
- 3.8 More detail needs to be provided, however, of the actual J14 improvement scheme proposed, including plans, land requirements and assembly, and detailed costings as opposed to just benchmarking a similar scheme. The Funding and Delivery Plan (FDP) estimates the J14 mitigation as costing £27.2m, however no breakdown of costs is provided, and this does not include land costs. Evoke (when employed by SYSTRA) has led a Working Group on improvements to J14 which identified a similar scheme as costing c£57m at 2018 prices when discussed through the preparation of the former Joint Spatial plan.
- 3.9 Moreover, clarity is required on the contributions anticipated from strategic site allocations in the Local Plan for J14 mitigation, and how these have been calculated and apportioned. For example, for Sharpness New Settlement c£750 per unit towards J14 mitigation is proposed which is woefully inadequate to address the infrastructure, particularly given the underestimation of total costs in the FDP.

Q5 Is the Council satisfied that the Plan proposals would not have an unacceptable impact on highway safety or that the residual cumulative impacts on the road network would not be severe?

- 3.10 NH has stated that J14 has historically operated over capacity, suffering from congestion at peak times. The latest modelling by WSP on behalf of NH shows that the existing junction operation results in the formation of extensive queues on the northbound off-slip in the morning peak period which in NH's view creates a safety issue, as well as queuing westbound on the B4509 from the direction of Charfield in the morning and evening peak. It is essential, therefore, that NH updates the SDLPR Examination of its latest modelling work and implications for the proposed allocations, to ensure the highway safety impacts from the Local Plan are fully mitigated.
- 3.11 The cumulative impacts of SDC and SGC future strategic growth need to be fully investigated using the latest NH VISSIM model to fully understand the issues and agree the mitigation package and timings.

Q6 How will the Council work with infrastructure and service providers (including National Highways, developers, landowners and neighbouring authorities) to identify and address any impacts of proposed development, including through the use of contributions, CIL and through the implementation of any highway improvement schemes?

- 3.12 A J14 Working Group was established on behalf of CEG/CLC by Evoke (when employed by SYSTRA), with NH, SGC and Gloucestershire County Council as well as developer representatives. Despite being invited to take part, input from SDC has been inconsistent.
- 3.13 SDC must work with NH and neighbouring authorities to cumulatively assess the impacts of proposed strategic development in Stroud District and the highway improvements required. For J14, the latest model must be used to accurately understand the current position, alongside an agreed position on the mitigation scheme, costings, and implementation timescales.
- 3.14 For the hearing sessions an up to date Statement of Common Ground is essential setting out where SGC and SGC agree and disagree to reflect the latest position on infrastructure delivery. The IDP Refresh (August 2022) alludes to continuing major concerns with NH and SGC which cannot have been resolved by the additional technical documentation consulted on in October 2022.
- 3.15 The calculation and apportionment of contributions for J14 mitigation from SDLPR growth is also unclear. All strategic developments that impact J14 need to contribute to the mitigation on a pro-rata basis, with a clearly defined contribution mechanism. A per dwelling tariff approach should also be included within the plan for smaller developments that still impact J14.

Demand management and sustainable travel measures – Core Policy CP13

Q7 Core Policy CP13 seeks to support major development subject to three transport related criteria. It also provides a further 4 criteria to be met by all development schemes. The policy also expects proposals to ‘consider all possible sustainable transport options’ before increasing the capacity of the road network and to be consistent with and contribute to the implementation of the agreed transport strategy.

Q7(d) Are the criteria justified and effective? Is it clear how a decision-maker should determine future proposals against each of the relevant criteria?

- 3.16 It is unclear how the strategic sites would be tested against policy CP13 particularly is there is no clear criteria in the actual site allocation policies (PS36) for mitigation of strategic road network impacts. For Sharpness for examples how does the proposed new station relate to criteria (i) particularly given the uncertainty of its delivery and what happens should it not be implemented.

Delivery and viability

Q15 Does the viability evidence supporting the Plan make realistic assumptions about costs?

- 3.17 No, the SDLPR does not make realistic assumptions about J14 costs.
- 3.18 In the absence of the ‘AECOM Mitigation Review’, it is assumed that the proposed ‘preferred mitigation’ scheme is taken from the previous Traffic Forecasting Report (TFR) (March 2021), which identifies a two-bridge gyratory scheme, including a new grade separated junction and the dualling of the B4509 between A38 and J14.
- 3.19 The FDP estimates that the cost of the ‘preferred mitigation’ scheme would be £27.2m, however no land costs have been allowed for. No breakdown of costs is provided, nor any information on when the cost was calculated; these are crucial details to understand whether the estimate is reasonable. Evoke has led a Working Group on improvements to J14 which identified a similar scheme as costing c£57m at 2018 prices.
- 3.20 With regards land requirements/costs, the FDP states that that ‘*there is a reasonable prospect of land being made available for the scheme by a promoter*’. It is understood that this is referencing Tortworth Estate, the landowner of the proposed Buckover Garden Village in South Gloucestershire, which controls three quarters of the land surrounding the junction. However, from the evidence available the status of the agreement between SDC and Tortworth Estate is unclear.
- 3.21 Details of the precise nature of the J14 upgrade works (including plans), with associated costings and land requirements, as well as agreement from all parties to deliver, are essential to demonstrating deliverability of the SDLPR.

Q16 The Transport Funding and Delivery Plan (July 2022) (TFDP) identifies three transport mitigation packages. These are:

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

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

- 3.22 A substantial upgrade of J14 is necessary to mitigate cumulative impacts of growth in Stroud District. NH considers that the junction is operating over capacity at the current time.
- 3.23 The mitigation measures listed in the evidence base document are not comprehensive. Details of the precise nature of the J14 upgrade works (including plans), with associated costings and land requirements, as well as agreement from all parties to deliver, are essential to provide certainty. At present this is a major omission and provides no certainty to plan deliverability.
- 3.24 SDC development needs to be significantly limited until the substantial mitigation is implemented at J14 and any interim growth needs to be jointly agreed with parties via a cumulative assessment.

Q18 The TFDP sets out indicative costs for the three schemes (page 5). For the M5 J12 scheme this is £9,437,500; the M5 J14 scheme is £27,246,837; and the A38 package is £3,812,500. Are these indicative costs realistic and do they provide a reasonable basis upon which to consider the viability of delivering the growth set out in the Plan?

- 3.25 The cost and funding assumptions do not provide a reasonable basis on which to consider viability. The J14 works have only been benchmarked against other schemes and not specifically assessed and this significantly underestimates costs.
- 3.26 Our answer to Question 15 covers the other necessary points.

Q19 The TFDP states that following discussions with National Highways, neither the M5 J12 or M5 J14 schemes are likely to attract funding from the Road Infrastructure Strategy (RIS) in the foreseeable future. Is that assumption still valid? Have all external sources of national funding for these schemes been fully explored?

- 3.27 The schemes cannot rely on RIS being available though the councils need to work jointly to lobby for such funds as a strategic intervention to unlock growth including the West of England Combined Authority. We are concerned that funding pathways to ensure delivery of this strategic mitigation haven't been fully explored as part of the plan-making process.
- 3.28 As a result, there is a serious over-reliance on developer contributions from future schemes within SGC which will only be confirmed through the next local plan review unless granted in advance of plan adoption.

Q20 In the absence of national funding being available, the TFDP sets out a proposed apportionment methodology which would seek to take account of external growth from neighbouring authorities (including Gloucester, Cheltenham, Tewkesbury and South Gloucestershire). The TFDP goes on to explain that at this stage, the scale, location and nature of growth in these Districts is uncertain due to their respective Plan's being at an earlier stage of development. Nevertheless, modelling assumptions have been made in order to take account of growth from neighbouring Districts.

Q20(a) Were neighbouring Districts involved in discussions to develop these modelling assumptions and has any agreement been reached on this issue (such as Statements of Common Ground)?

- 3.29 We are hopeful that an updated Statement of Common Ground will be agreed between SDC and SGC to confirm the current position in time for the hearing sessions.
- 3.30 SGC cannot confirm the level of growth to the north of the district at the current time and we expect that they have ongoing concerns on the assumptions used for apportionment and the deliverability of the proposals. SGC has pushed these issues with SDC for a number of years but without a satisfactory resolution and the plan fails the Duty to Cooperate test in this respect.

Q20(c) The TFDP goes on to apportion background growth between neighbouring authorities developments based on these assumptions. Table 7 sets out the results of the apportionment exercise. M5 J14 is 20% from Stroud and 80% from neighbouring authorities; it would therefore appear that the majority of funding required for these infrastructure schemes is expected to be provided by neighbouring authorities, presumably sourced from developer contributions. Are these assumptions realistic or reasonable? Is there a realistic prospect of this funding coming forward to deliver the infrastructure required?

- 3.31 It is unrealistic that 80% of costs are proposed to be covered by SGC growth. Developments in SGC will deliver significant contributions but not to the extent envisaged. The SDC approach is unrealistic and unreasonable. It is unacceptable for the SDLPR to use the apportionment as a basis for the modelling without agreement from SGC. A full cumulative assessment is required of all strategic growth proposed in local plans impacting J14 to ensure an equitable position on contributions.
- 3.32 CEG/CLC is concerned that a 20% apportionment vastly underestimates the impact of the strategic allocations at Sharpness New Settlement, Sharpness Docks, Wisloe New Settlement and Land West of Renishaw New Mills.
- 3.33 The Traffic Forecasting Report Addendum (TFRA) identifies an approximately 5-minute delay on J14 and its approaches with the inclusion of SDLPR growth (without mitigation), however the FDP and IDP reference only a 20% impact from SDLPR growth.
- 3.34 Greater clarity is needed as to how these assumptions have been derived, including calculations of the breakdown and the assumptions used to calculate growth in neighbouring authorities with agreement with SGC. This evidence is fundamental to the financial contributions proposed for the new settlement and the delivery of the SDLPR.

3-35 The SDLPR therefore needs to take a cautious approach to delivery of infrastructure at J14 and include more substantive contributions and a clear pathway for how the infrastructure is funded and in what timeframe against the trajectories for the proposed strategic sites.

Q20(d) Have discussions with neighbouring authorities taken place regarding the apportionment of these costs? Has any formal agreement been reached? How would funding for these schemes be collected and distributed? Which Council would lead the co-ordination and provision of these infrastructure schemes?

3-36 We understand that there is no agreement between SDC and SGC on apportionment of costs or on the funding mechanism and timescale. We are hopeful that an updated Statement of Common Ground will be provided prior to the hearing sessions and the Focused Discussion on strategic highway infrastructure to clarify such matters.

3-37 **Q20(f) Is the level of funding that is expected to be sourced from developments in neighbouring authorities realistic and is there a reasonable prospect of it being secured during the lifetime of the Plan? If not, are there any implications for the delivery of the Plan?**

3-38 Planning Practice Guidance (para 61-059-20190315) states that strategic policy-making authorities need to demonstrate there are reasonable prospects that strategic-scale infrastructure would be delivered during the plan period. The SDLPR evidence base documents do not demonstrate that the necessary highways interventions would be delivered during the plan period. These highways interventions are critical to the delivery of housing and employment allocations. This therefore raises concerns regarding the Plan's deliverability during the plan period and the soundness of the SDLPR, as per NPPF (para 35c).

3-39 The level of future growth proposed by SGC to the north of its district is currently unclear and will be confirmed through the future stages of its Local Plan review (Regulation 18 later this year). There are various sites being promoted to the north of the district including Charfield, Buckover and at Thornbury. These schemes will be able to make appropriate contributions however not to the extent of 80% of the costs based on SDC's estimate. This assumption seriously calls into question the deliverability of the plan.

Q20(g) Are any of the schemes identified reliant on land in third party ownership for their delivery? If so have discussions with relevant land owners taken place? If necessary, have realistic acquisition costs been included when calculating likely scheme costs?

3-40 We understand that three quarters of the land to deliver the J14 improvement works require private land assembly. This land is owned by Tortworth Estate and to our knowledge there is no agreement set out in the examination documentation to demonstrate that this land will be available nor anything to justify the FDP statement that *'there is a reasonable prospect of land being made available for the scheme by a promoter'*.

3-41 Representations made by Avison Young on behalf of Tortworth Estate / St Modwen in 2021 raised concern about the impacts of proposed strategic-scale allocations on the strategic highways network in the M5/A38 corridor, and the implications of strategic highways interventions on plan deliverability.

3-42 Hopefully an update on the latest position and more recent discussions held can be provided at the hearing sessions.

Q20(h) The TFDP distributes the growth apportioned for Stroud District to 12 site allocations. Is the scale and distribution of costs reasonable? Is there agreement that the costs set out are reasonably accurate? Have viability considerations been appropriately considered?

- 3.43 The scale and distribution of costs is not reasonable.
- 3.44 Further clarity is required on the contributions anticipated from each site allocation. Appendix A of the IDP does not list contributions towards J14 mitigation from the new settlement at Wisloe (PS37) or land west of Renishaw Mills (PS47), despite the document earlier (para 2.1.1) acknowledging that these sites are expected to impact J14. There is an inconsistency in the evidence base.
- 3.45 The FDP does note that the proposed contributions towards J14 will be: £1.8m from Sharpness New Settlement; £850k from Sharpness Docks; £580,000 from Wisloe New Settlement; and £2.14m from Land West of Renishaw Mills. These contributions are however vastly underestimated. The works are likely to far more expensive and the impact from SDC growth far greater.
- 3.46 The FDP estimates that the cost of the ‘preferred mitigation’ scheme would be £27.2m without land costs. This compares to Evoke’s (when employed by SYSTRA) cost estimate of a similar scheme which was c£57m at 2018 prices. Greater costs clearly need to be apportioned to SDC growth and this tested through an updated Viability Assessment.
- 3.47 All developments proposed in local plans that impact J14 need to contribute to the mitigation on a pro-rata basis with a clearly defined contribution mechanism and that set out in the associated site policies. A per dwelling tariff approach should also be implemented for smaller schemes to ensure that all options of funding are pursued where there is an evidenced impact on the operation of J14.

Q20(i) The TFDP states that sites delivering over 150 dwellings were considered capable of contributing towards strategic mitigation packages. How was this threshold set? Is it justified?

- 3.48 It is important that all schemes in the Local Plan that have any impact on the operation of J14 contribute and that contributions are ring-fenced and this should also apply to smaller sites.
- 3.49 All sources of funding need to be maximised in order to ensure delivery of the J14 improvement scheme. This should also apply to smaller windfall sites that impact on the junction’s operation with an appropriate charging mechanism set out in the plan.

Q20(j) If agreement on the apportionment of growth to neighbouring authorities cannot be reached, or if it is found that Stroud should meet a greater proportion of the cost of these schemes would there be implications for the deliverability and viability of these allocations?

Q20(k) Equally, if agreement cannot be reached would failure to deliver the infrastructure schemes during the plan period affect delivery assumptions for these allocations?

Q20(l) Are any allocations or development reliant on the delivery of any of these schemes at a particular point during the plan period? For example we note comments from National Highways that improvements to Junctions 12, 13 and 14 of the M5 are likely to be required early in the plan period. If so, is a lack of identified funding likely to affect delivery assumptions in the Plan?

- 3.50 Delivery of J14 infrastructure is critical to a number of the strategic sites as identified by the SDLPR and its evidence base including Sharpness New Settlement, Sharpness Docks, Wisloe New Settlement; and the employment floorspace at Land West of Renishaw Mills.
- 3.51 According to the IDP Addendum cumulatively the above housing sites would deliver: 1,177 homes between 2025 and 2030; 1,488 between 2030 and 2035; and 1,375 between 2035 and 2040. This strategic growth cannot be accommodated until the improvement works to J14 are implemented.
- 3.52 A lack of identified funding and overreliance on contributions from SGC future growth is most certainly going to impact on the deliverability of the plan and the trajectories for the build out of the strategic sites.

Q21 The Sustainable Transport Strategy (STS) Addendum (July 2022) lists 14 interventions to be included in the STS Addendum (Table 2.2). The schemes include a number of significant infrastructure projects that are referred to in the Plan including public transport for a strategic park and interchange hub scheme for M5 J12 and a new railway station (s) south of Gloucester, north of Bristol. Under funding status, all the interventions state 'still required'.

Q21(a) Has any funding been identified to support the delivery of these interventions?

Q21(b) Reference is made to a Strategic Outline Business Case (SOBC) being produced for a potential rail station at Stonehouse which will test options and deliverability. What are the timescales for this piece of work and when is it expected to be completed? If the SOBC concludes that a new station would not be viable would there be any implications for the Plan?

- 3.53 The new railway station is in the early stages of Outline Business Case (OBC). As Stantec's Technical Note (23 June 2021) confirms, the OBC was not produced as a formal submission. There is clearly still much formal work to do, and therefore significant uncertainty regarding the status of the project and the likelihood of the station coming forward, particularly within the plan period.
- 3.54 This is contrasted by Charfield Station in South Gloucestershire for which WECA allocated £2.923m to develop the Full Business Case in December 2021. WECA's Investment Fund

Programme allocates £4.123m to Charfield Station until 2025/26. A planning application is currently being determined by SGC.

Q21(c) Are any allocations or development reliant on the delivery of any of these schemes at a particular point during the plan period? If so, is a lack of identified funding likely to affect delivery assumptions in the Plan?

Q21(d) Are these interventions expected to be delivered during the plan period and if so how will they be funded?

- 3.55 The strategic development at Stonehouse is reliant on the delivery of the new station – Policy PS36 requires a *‘new railway station and enhancements to the Sharpness branch line and contributions to support a regular passenger service to Gloucester’*.
- 3.56 Generally, a new development-led station requires c.5000 units to be viable , assuming no train operating expenditure is required – i.e. existing services are capable of being used, which is not the case here. In terms of new services, an estimated allowance of £1m a year per train should be made for leasing, track access charges and direct operating; £2m for two two-car trains. Currently, a return ticket from Cam & Dursley to Gloucester is £8.60 peak/£6.00 off-peak, meaning 800 journeys a day would be required to just cover operating costs.
- 3.57 It is clear, therefore, that the service proposed relative to the size of the new settlement at Sharpness would not be financially viable. Further evidence needs to be provided to justify the viability of the rail service and SDLPR deliverability.
- 3.58 The plan’s delivery assumptions would significantly be impacted should the station not come forward as anticipated.

Q22 The STS Addendum also refers to land being safeguarded for the potential rail stations at Stonehouse and Charfield. The Stonehouse site is safeguarded through Delivery Policy EI14, but Charfield is not included. Is there sufficient evidence available at this stage in the process to justify safeguarding land for these two potential stations? Are they likely to be delivered during the plan period?

- 3.59 Charfield station lies within South Gloucestershire with an application currently being determined. Significant funding has been allocated by WECA to the development of a Full Business Case. It is anticipated that the station would open by the end of 2024. Whilst this timescale is quite ambitious, it is a reasonable assumption to assume that the station would be open within the plan period.
- 3.60 The Stonehouse Station is at a much earlier stage and we would question whether there is sufficient evidence to underpin a safeguarding allocation at this stage.

Q24 The STS Addendum has updated the assessment framework that fed into the modelling in order to understand the traffic impact of the site allocations on the District's highway network. One of the considerations used in the update is stated as being a greater ambition towards sustainable travel across the District and to consider the impact of new sustainable transport interventions. Table 5.1 lists the effect of the updated assumptions, with most showing a reduction in the number of trips as a consequence of the updated considerations.

Q24(a) How was the extent of the reduction in the number of trips decided? Are the values evidence based?

- 3.61 It is unclear how the reduction in trips was calculated on the basis of delivery of potential sustainable transport links such as Stonehouse rail station. We note that the STS Addendum in Table 5.1 highlights the uncertainty regarding delivery of the Station. The fallback mitigation in the event the station is not delivered needs to be made clear through the strategic site policies and presumably would focus on a bus-based strategy only.

Q24(b) Given that there is some uncertainty over the funding status of many of the sustainable transport schemes listed in the STS Addendum was it reasonable to take account of these considerations?

- 3.62 Planning Practice Guidance states that there needs to be reasonable prospects for strategic-scale infrastructure being delivered within the plan period. Taking an example such as the opening of Stonehouse station this bar clearly cannot be met at the current time.

Q24(c) If the sustainable transport interventions cannot be delivered in the right place and at the right time to support the allocations, what effect, if any, would this have on the updated modelling assumptions in terms of impact on the highway network?

- 3.63 If Stonehouse rail station and other supporting sustainable interventions are not delivered as anticipated there will inevitably be a greater impact on the strategic road network including J14. The plan has not sufficiently tested the implications of a fallback position and the likely impact on funding, viability and deliverability.