



EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN REVIEW

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

MATTER 11: Infrastructure Provision and Viability

Matter 11b Transport

On behalf of: Robert Hitchins Ltd

Date: January 2023 | Pegasus Ref: SHF/P17-2258

Author: Julian Alexander (PFA Consulting) Sarah Hamilton-Foyn (Pegasus)



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	17.01.2023	Julian Alexander	S. Hamilton-Foyn	
V2	2.02.2023	Julian Alexander	S. Hamilton-Foyn	Input from Pioneer



Pegasus is instructed by Robert Hitchins Ltd to submit a Statement in respect of Matter 11b, pursuant to the Matters and Questions identified by the Examination Inspectors.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1
- Matter 2
- Matter 3
- Matter 6
- Matter 6a
- Matter 6c
- Matter 6d
- Matter 6g
- Matter 7
 - Matter 7a
 - Matter 7b
 - Matter 7c
- Matter 8
- Matter 10
 - Matter 10a
 - Matter 10c
 - Matter 10d
- Matter 11
 - Matter 11a
 - Matter 11b
 - Matter 11c

Following the submission of the Reg 19 representations in July 2021 Pegasus along with PFA Consulting and Pioneer Housing and Development Consultants have also responded to the Stroud District Local Plan Review Additional Technical Evidence in October 2022.

The Hearing Statements should be read alongside our representations and supporting evidence. As instructed, we have not repeated our representations of July 2021 or October 2022; but instead sort to highlight the salient points in response to the MIQs and indicated what changes we consider necessary in order for the Plan to be found sound.



CONTENTS:

	Page No:
11. MATTER 11 - INFRASTRUCTURE PROVISION AND VIABILITY	1
Matter 11b Transport	1

11. MATTER 11 – INFRASTRUCTURE PROVISION AND VIABILITY

Matter 11b Transport

Since the submission of the Plan and the production of the Council’s Transport Topic Paper (EB6), technical updates on transport and viability have been published

Definition and scope of transport infrastructure required

2. **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?**
 - 2.1 The traffic modelling underestimates the traffic impacts on the wider highway network from the proposed allocation at Sharpness, and only assesses 2,400 dwellings as opposed to the total number planned of 5,000 dwellings. Further mitigation to that identified in the ‘Preferred Highway Mitigation Strategy’ would likely be required should the development traffic reductions assumed for sustainable travel from the site not be realised, or the additional housing comprising the total allocation for the site as a whole. To allocate the site at Sharpness certainty would be needed that the complete development could be appropriately mitigated and delivered.
 - 2.2 Given the location of Sharpness being some distance from the main movement corridors and major centres of employment, with limited opportunities for sustainable travel, the scale of development proposed at Sharpness is not considered appropriate.
3. **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?**
 - 3.1 In our representations we stated that it was clear from the IDP that there are several areas of transport infrastructure which raise significant concerns about the delivery of the proposed development and also the timing and availability of infrastructure which may well affect the viability of development.
 - 3.2 There is a concern that some of the transport infrastructure identified to mitigate the traffic impacts of the Local Plan would be difficult to deliver given the high costs involved and reliance on funding from other sources. This is compounded by some of the costings in the IDP, in particularly the M5 J12 grade separated junction and the Sharpness Branch Line and New Station which are considered to be grossly underestimated (see our response to EB109).
 - 3.3 The long timescales that would be involved in delivering the improvements at M5 J12 & M5 J14 would likely affect the delivery of development in the Local Plan given the reliance on these improvements for a number of the strategic sites and the existing capacity constraints at these two junctions.
4. **Will the mitigation measures identified be sufficient to address the highway impacts identified?**

- 4.1 The traffic modelling suggests that the proposed mitigation would be sufficient to mitigate the traffic impacts of the Local Plan growth; however, there are concerns with the affordability and deliverability of some of the key transport mitigation schemes, such as M5 J12 & M5 J14 which are fundamental in delivering the planned growth.
- 4.2 There are concerns that the B4066, Alkington Lane and Breadstone Road which links the allocations at Sharpness with the A38 Bristol Road would not be sufficient to support the levels of growth proposed in the Local Plan; these concerns are further compounded given that further development is proposed at Sharpness beyond the Plan period (see our response to EB98).

5. 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?

- 5.1 The traffic modelling relies on key transport infrastructure being delivered in a timely manner. Given the concerns raised with the costings of some of the key infrastructure schemes, and reliance on funding from Neighbouring Authorities, this again questions the affordability and deliverability of the proposed transport mitigation without which the residual cumulative impacts would likely be severe (see our response to EB98).

6. 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?

- 6.1 This is one for the Council to address.

Demand management and sustainable travel measures – Core Policy CP13

7. 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.

- a. Is the policy consistent with national policy which includes seeking to minimise the need to travel and promoting sustainable transport modes?
- b. Does the policy set out clear requirements for sustainable transport provision? What is meant by the term ‘consider all possible sustainable transport options’? What are developers meant to do after they have considered such options?
- c. Does the policy recognise that opportunities to maximise sustainable transport solutions may vary between urban and rural areas as recognised in paragraphs 85 and 105 of the Framework? How does this apply to Stroud District?
- d. Are the criteria justified and effective? Is it clear how a decision-maker should determine future proposals against each of the relevant criteria?
- e. Is the reference to ‘having regard to ... the Council’s adopted (parking) standards’ appropriate? Are these the standards set out in Appendix C? Is the policy clear on this and are the standards justified?

- f. **Is the requirement to be consistent with the transport strategy justified?**
 - g. **How does this policy relate to Delivery Policy EI12? Are the policies consistent? Is there unnecessary or confusing duplication between these policies?**
- 7.1 CP13 places an emphasis for new development to be:
- “located where there are, or will be, at the time of development, choices in the mode of transport available and which minimise the distance people need to travel”**
- “Development proposals will be expected to consider all possible sustainable transport options before the capacity of the road network is increased.”**
- 7.2 Our previous representations have argued that the allocation at Sharpness would not meet the above requirements set out in Policy CP13. It is in a location some significant distance from the main movement corridors and major centres of employment, as can be seen in **Figure 1** below. It does not offer a realistic choice for sustainable travel; the proposed new rail service cannot be guaranteed, and the commercial case for a coach based public transport service is questionable. Consequently, development at Sharpness will be contrary to Policy CP13; it will likely encourage travel by car and do little to reduce the impacts of vehicular traffic in terms of both congestion and carbon emissions.
- 7.3 The IDP June 2021 (EB69) at page 27 confirms this; it states:
- “The proposed allocations at PS34 Sharpness Docks and PS36 New Settlement at Sharpness have an issue of relative remoteness, particularly in public transport terms. This increases demand for private car usage”.**

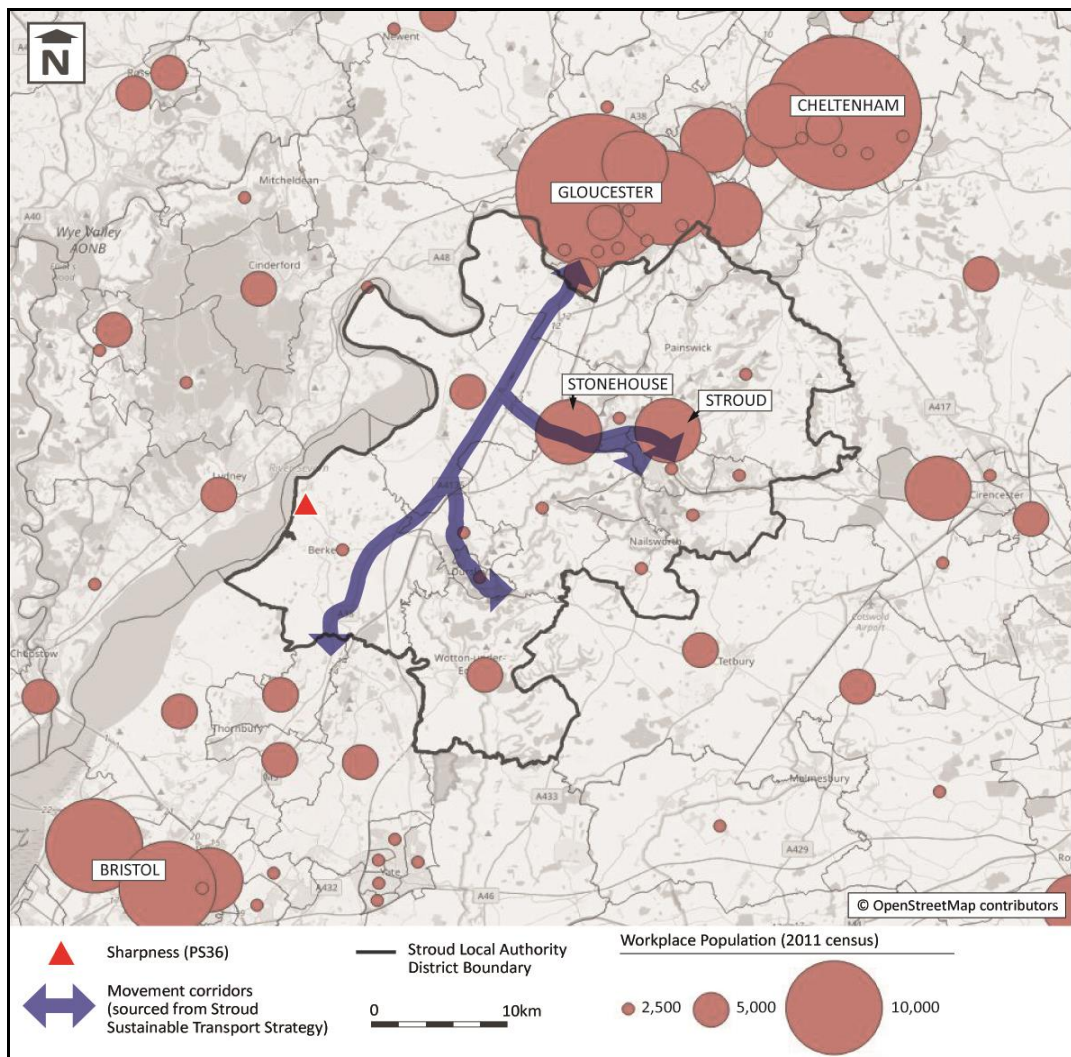


Figure 1: Remoteness of Sharpness to employment and STS movement corridors

Promoting transport choice and accessibility – Delivery Policy EI12

8. The policy seeks to promote transport choice and accessibility.
 - a. The policy requires parking standards and principles for development to be provided to the adopted standards in Appendix C. Is this requirement consistent with Core Policy CP13 which only requires regard to be had to the standards? Is the policy clear and are the standards justified and consistent with national policy?
 - b. How does this policy relate to Core Policy CP13? Are the policies consistent? Is there unnecessary or confusing duplication between these policies?

8.1 Policy EI12 states that:

“Walking, cycling and public transport facilities will be required to be put in place as early as possible in development proposals to ensure that opportunities for sustainable travel are available to support early occupiers in establishing sustainable travel patterns.”



- 8.2 Our representations have shown that Sharpness is not well served by a regular frequent bus service. New development is better located at locations already served by public transport over other more remote and inherently less sustainable locations.

District- specific wide mode strategies – Delivery Policy DE11

9. The policy describes what the Council’s intention is in relation to working with key partners rather than setting clear policy requirements for development? Can the Council explain the purpose of the policy?

9.1 No comment.

Protecting and extending our walking and cycling routes – Delivery Policy EI13

10. The policy includes not permitting development where it would significantly harm an existing walking or cycling route or prejudices the proposed routes as listed. What is meant by ‘significant harm’ and are the 8 listed routes justified? Are these clearly identified on the policies map?

10.1 No comment.

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

11.1 No comment.

Provision and protection of rail stations and halts – Delivery Policy EI14

12. Is the policy justified, effective and consistent with national policy?

12.1 No comment.

Protection of freight facilities at Sharpness Docks – Delivery Policy EI15

13. Is the policy justified, effective and consistent with national policy?

13.1 No comment.

Provision of public transport facilities – Delivery Policy EI16

14. Is the policy justified, effective and consistent with national policy?

14.1 No comment.

Delivery and viability

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

- 15.1 The issue of viability evidence cost assumptions has been commented on in detail in:
- representations submitted on behalf of Robert Hitchins Ltd to Policies CP7, CP8, CP9, DCP2, HC3 and HC4 to the Regulation 19 Consultation (representation reference 879 – “rep 879”) accompanied by Appendix Attachment A – Response to Stroud Local Plan Review Submission Draft, May 2021 in respect of Stroud District Council Local Plan Viability Assessment, Working Draft, May 2021 and

- Appendix 1 to representations submitted on behalf of Robert Hitchins Ltd to the 'Stroud District Local Plan Review Additional Technical Evidence - Limited Consultation' in October 2022 ("Appendix 1 to the ATE Response"),

15.2 It has not been demonstrated that the viability evidence makes realistic cost assumptions.

15.3 As concluded at paragraph 6.2 of Appendix 1 to the ATE Response in respect of EB111 (i.e., "LPVA22") and its appendices:

"Many of the cost assumptions seem likely to underestimate the costs that development will actually face as a result of the proposed policies...Underestimating policy costs will artificially improve viability outcomes."

15.4 A significant concern in respect of the Development Costs section of the EB111 remains the failure to clearly acknowledge in the baseline testing the full extent of s106 costs which have been routinely sought from sites across the County as a result of a new County formulaic education approach.

15.5 The 'sensitivity' appraisal summaries in Appendix 14 of EB111 suggest that, assuming 30% affordable housing, CIL, s106 at £20k per unit and in the context of the emerging policies for which costs have been assumed, **41 (76%) of the 54 generic sites tested fail to achieve a RLV that exceeds the BLV**. The Gloucester Fringe and Cotswolds sub-area is suggested to have the most viable sites against the EB111 benchmark land values (BLVs), but still contains 5 out of the 14 sites tested (36%) that have RLVS below the BLVs.

15.6 County education s106 costs are stated to be reflected in EB111 modelled assumptions for the strategic sites tested based on the Local Plan Review Infrastructure Delivery Plan ("IDP") Addendum Report published in August 2022. However, the May 2021 IDP / August 2022 IDP Addendum fail to transparently set out, on a site by site basis, how all the different infrastructure items required will be funded (i.e. including in respect of s106 and or CIL), the total costs of this, or the timing of these costs.

15.7 Even without having regard to concerns regarding overestimated sales values and underestimated costs EB111 suggests that **the entirety of the proposed policy and developer contribution requirements cannot be supported by c.69% of the non-strategic and 100% of the Strategic Sites tested**.

15.8 Our previous representations (in particular to EB109) have highlighted concerns about the costs of a number of the transport schemes which form part of the mitigation to deliver the Local Plan growth. There is a significant underestimation of the cost of some key schemes, notably M5 J12 and the re-opening of the Sharpness Branch Line; with many costs based on broad cost bands. A realistic appraisal of transport scheme costs will be necessary as this will have a bearing on the viability of the Local Plan.

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

M5 Junction 12:

- **improvements to M5 J12 (a new grade-separated junction);**
- **Improvements to the A38 / A430 / B4008 'Crosskeys' Roundabout; and**

- Improvements to the B4008 / Stonehouse junction.

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

A38 Corridor (This package includes the following number of individual junctions which have been identified for highway capacity improvements in the Traffic Forecasting Report (EB61)):

- A38 / Grove Lane;
- A38 at Claypits;
- A38 / B4066;
- A38 / B4066 Berkeley Road;
- A38 / Alkington Lane; and
- A38 / A4135.

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?

16.1 Given the importance of these three transport mitigation packages to deliver the Local Plan growth, it is considered essential that more informed costings are provided, as this will determine their affordability in delivering the proposed development.

17. As regards the proposed dualling of the B4008 and new park and ride:

- a. Should these be included in the M5 J12 mitigation package?**
- b. Is it reasonable and realistic to expect the dualling of the B4008 to be delivered as part of the Javelin Park extension site? Has a scheme been identified and costed to deliver this piece of infrastructure? Are there any implications for the delivery of the Javelin Park extension site? For example, is it necessary for this scheme to be delivered at a particular stage of the development and is that achievable?**
- c. If the new park and ride scheme is still at scoping stage does this have implications for the viability and deliverability of the Plan?**

17.1 The updated modelling (see our response to EB98) has shown that the additional development at Javelin Park will put further pressure on the operation of the highway network at M5 J12 for which further mitigation is likely.

18. 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?

18.1 The indicative costs in the TFDP are not realistic. The 6.25m for a new grade separated junction at M5 J12 is a significant underestimation; the cost is likely to be at least 5 times this figure based on recent evidence of similar schemes. The cost for the A38 package of schemes are based on arbitrary cost bands from the GLTP4.

18.2 It is important to have realistic costs for these key schemes, as this will determine the level of funding required, which will impact on the affordability and deliverability of the

proposed mitigation which will have implications on the viability of the Local Plan to deliver development in a timely manner.

19. **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?**

19.1 This is a question for the Council to respond to.

20. **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.**

- 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)?**
- b. **In looking at housing growth assumptions and the split between major and minor/windfall development it is noted that this was derived from housing delivery data from Stroud District. Was this a reasonable and realistic assumption to make? Are patterns of housing delivery data between Stroud and neighbouring authorities sufficiently similar to make this assumption valid?**
- 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 J12 is set out as 38% Stroud and 62% from neighbouring authorities; M5 J14 is 20% from Stroud and 80% from neighbouring authorities; A38 Corridor is 60% from Stroud and 40% 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?**
- 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?**
- e. **How would the global figure assigned to neighbouring authorities be broken down at the individual district level?**
- 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?**

- 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?
 - 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?
 - 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?
 - 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?
 - k. Equally, if agreement cannot be reached would failure to deliver the infrastructure schemes during the plan period affect delivery assumptions for these allocations?
 - 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?
- 20.1 It is of paramount importance that accurate cost estimates are established together with realistic apportionment of funds to determine any shortfall such that sources of funding can be secured to provide certainty and the timely delivery of the Local Plan. There is a gross underestimate of the cost of M5 Junction 12, errors in the apportionment of impacts and an expectation that significant proportions of the funding of the mitigation packages will come from Neighbouring Authorities. We do not believe this has been discussed with the JCS authorities and there is no timescale or certainty and limited information on the locations or timing of housing growth outside of the Stroud District. This questions the affordability and deliverability of the proposed mitigation packages to deliver the Local Plan growth, particularly early in the plan period.
21. **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'.**
- a. Has any funding been identified to support the delivery of these interventions?
 - 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?

- 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?**
- d. Are these interventions expected to be delivered during the plan period and if so how will they be funded?**

21.1 No comment in respect of the additional interventions identified in the STS Addendum (EB108) although, as set out in our previous representations, sustainable transport schemes identified in respect of the PS36 Sharpness allocation, which include a new rail service, Mobility-as-a-Service and bus public transport, cannot be guaranteed and are in question by the relevant parties including Gloucestershire County Council and the local bus operator.

- 22. 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 E114, 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?**

22.1 No comment.

- 23. The STS Addendum sets out a number of other proposed updates to site proposal and policies (page 15 onwards).**

- a. Are these proposals necessary and justified by the evidence?**
- b. Has the effect of these requirements on the viability of the relevant allocations and policies been considered and if so what does the evidence show?**
- c. In order to ensure that the Plan is effective should the updates be incorporated into the text for the relevant allocations/policies in the Plan?**

23.1 In respect of PS36 Sharpness the updates to site proposals include:

- The development will lead to enhancements to the Sharpness branch line and support a regular passenger service to Gloucester; and
- Measures to reduce car usage and ownership will be part of the development, which will include Mobility-as-a-Service systems, bike hire schemes and incentives for public transport use.

23.2 As set out in our previous representations, the PS36 Sharpness allocation is in an unsustainable location some significant distance from the main movement corridors and major centres of employment. It does not offer a realistic choice of sustainable transport modes; the proposed new rail service cannot be guaranteed and the commercial case to provide a relevant bus or coach-based public transport service is in question.

23.3 Gloucestershire County Council, in its role as local highway authority, commissioned a Rail Service Viability Statement, (which is attached to GCC Reg 19 submission as Appendix A) which concluded that “the scheme does not currently have a compelling business case. It requires an investment of £34.85m and the resulting service will require subsidy on an ongoing basis.... It is our opinion that, based upon the current

situation, that there are considerable risks to this scheme which make it unlikely that it would gain the necessary approvals for the scheme to progress to delivery.”.

23.4 GCC’s Reg 19 representations concluded that the evidence for the allocation is not sound; the development is unsustainable when considered against the policies outlined in both the NPPF and Stroud District Local Plan; and the transport measures proposed are not considered viable or deliverable.

24. 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.

- a. How was the extent of the reduction in the number of trips decided? Are the values evidence based?**
- 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?**
- 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?**

24.1 It is our understanding that the SATURN traffic modelling has not been updated to include the changes to the assessment framework summarised in Table 5.1 of the STS Addendum.

24.2 The updated modelling reductions at Appendix A in the STS Addendum (EB108) still shows the new settlement at Sharpness to have the greatest level of reduction in car trips for trips to Bristol and Gloucester reflecting direct public transport services. It is unclear why this is the case, given its isolated location away from the sustainable movement corridors, the greater travel distances involved, the disparate range of employment destinations, and the questionable commercial case for providing either a rail or bus service.

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

Cirencester

Pegasus House, Querns Business Centre,
Whitworth Road, Cirencester, GL7 1RT
T 01285 641717
E Cirencester@pegasusgroup.co.uk
Offices throughout the UK & Ireland

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE



All paper sources from sustainably managed forests
Pegasus Group is a trading name of Pegasus Planning Group Limited
(07277000) registered in England and Wales.
Registered office: Querns Business Centre, Whitworth Road, Cirencester,
Gloucestershire, GL7 1RT
We are ISO certified 9001, 14001, 45001



Pegasus_Group



pegasusgroup



Pegasus_Group

PEGASUSGROUP.CO.UK

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE