

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="Y"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="N"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="Y"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This Policy allocates land at Sharpness Vale for up to 2400 dwellings, and 5Ha of employment deliverable in the plan period to 2040. The Plan and this and other policies related to Sharpness Vale have adopted a much wider vision that has been advanced by the promoter, that it considered by them to be able to accommodate a much larger quantum of over 4000 dwellings: exactly what this number is is actually something that has varied over the period the concept has been promoted.

We acknowledge that NPPF explicitly recognises that large scale new settlements, by virtue of their scale and long lead-in time, might warrant a long-term plan horizon or, at least an approach that goes beyond a typical plan period. This of course reflects a great deal of wider evidence, including the [Letwin Independent Review of Build Out \(2018\)](#) and the Lichfield research entitled ["From Start to Finish"](#) (2nd ed. Feb 2020).

The "phase 1" site proposed for allocation lies entirely west and south of a largely disused freight branch rail line. The phase 2 site for delivery beyond 2040, extends quite substantially north of the line.

The western edge of the Phase 1 site is co-terminous with the eastern boundary of the existing mixed-use allocation at Sharpness Docks, which provides for about 300 additional dwellings. There is an argument that the arguments or allocating each site are so closely conjoined, that the two might well be better treated as a single allocation.

Stagecoach, has been abundantly and consistently clear about its very serious concerns about the appropriateness of a local plan strategy that includes a remote new settlement at Sharpness.

We need, once again, to set out the basis for this concern. We explain elsewhere in our representations regarding the evidence base and other aspects of the plan as a whole, that the effects of development related traffic generation on our business, arising from inappropriate and unsustainable patterns of development that have evolved over the last years, mean we cannot any longer stand by and see highly unsustainable, car-dependent patterns of development perpetuated, and worse still, reinforced.

Much more positively, we continue to believe that this Local Plan Review offers an historic opportunity to secure a shift towards much improved active travel infrastructure, and public transport provision, despite the high existing levels of car dependency and relatively limited public transport offer. Indeed, given the baseline position, it is still the more vital that the plan maximises the opportunities to transform the current public transport offer across the District, given the fact that the bulk of travel demands arise from existing residents and activity.

We believe we can offer a well-evidenced basis for our own vision to achieve this, which will be given substantial forward impetus by the National Bus Strategy and the impending Bus Service Improvement Plan for Gloucestershire, that will be collaboratively produced with the County Council. However we do not see any basis to effectively fold Sharpness Vale into such a vision, or indeed a proposed public transport strategy for the District referred to in the Draft Plan at Policy DEI1.

Summary of the Stagecoach position regarding Sharpness Vale

- Sharpness Vale by virtue of its remote location for all significant centres of population and activity, represents a **highly and unjustifiably intensified spatial development strategy** for the District.
- As such the transport demands arising from the development off site are inevitably going to be **motorised, energy intensive and dispersed to a large number of distant destinations, making carbon neutrality inherently harder to achieve**, than almost any other credible development option.
- The site, lying both distant from destination and entirely off-line any existing traffic low, much less public transport route, makes it **impossible to secure any synergy with or benefit to, existing or credibly deliverable public transport services** in support of the plan's objectives and priorities.
- A superficially-elaborate package of "bespoke" transport infrastructure and services is therefore proposed. The involves what could be described as a "development-oriented transit" strategy focused on, and reliant entirely upon demand from the development itself. **The attractiveness and thus the effectiveness of the sustainable transport provision is fatally undermined** by the very limited frequencies likely to be achievable, (many in effect a single round trip per day on contract coaches); extended journey times relative to car use, and the limited range of destinations.
- The **cost of any such provision, by whatever means provided, is exceptionally elevated by the distances involved**. When the low value of the service to the public is set against the inherently elevated costs of provision, the **economics are utterly compromised**, making any expectation that it could be delivered or sustained in the longer term highly challengeable. **Methods of addressing a very large permanent funding gap** by levying a charge on all residents, if implementable and justifiable, **will do nothing to make the service more attractive or effective**.
- **These costs are not set out anywhere in the promoter's supporting material**, for any element of the proposed provision apart from the bespoke commuter coaches.
- **The rationale for the allocation to an exceptional degree relies upon restoration of passenger rail services on the Sharpness Branch Line**. This requires both the reinstatement of passenger rail infrastructure, including track, signalling and station, and the ongoing provision of a regular scheduled rail service. The **evidence to support the deliverability of this is scant**. The **costs are not specified at any point**, but can be expected to be exceptionally high. Neither Network Rail nor Great Western Railway has made any substantive representations at any stage of the plan-making process, or other public statements that they sponsor or "buy-in" to these proposals, which themselves have been subject to huge changes over the promotional period. Such evidence that does exist in the

public domain is clear that the business case and opportunity costs of any such project are likely to make it unjustifiable.

- The site benefits from virtually no meaningful current provision of travel choices to car use. Furthermore, any level of self-containment will **only be realised progressively over a very extended build-out**. Thus over an extended period an exceptionally high proportion of trips are likely to require off-site, with few if any practical or credible choices available to meet them.
- **Stagecoach refutes the contention that meaningfully attractive and effective local bus services can ever be delivered within realistic resources and costs to this location**, even on a permanently loss-making basis, supported in some manner by a permanent revenue support mechanism.

As such, the proposals at PS36 are considered by Stagecoach to be entirely unsound, being fundamentally:

- **Out of conformity with national policy** at paragraphs 72, 102-103 and 105 of NPPF, in particular the requirement at paragraph 103 that "*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.*"
- **Inadequately evidenced** on costs and deliverability of either the transport package or the viability of the development as a whole, and thus **unjustified**;
- given the exceptionally elevated abnormal costs associated with transport and servicing, look highly likely to be **undeliverable** at any stage without substantial external funding support, risking this aspect of the plan being **ineffective**
- the proposed **allocation is inconsistent with and undermines delivery of the strategic objectives and Key Priorities of the plan**, and is clearly out of conformity with the proposed strategic policies of the plan set out, among other places, at DCP1 and CP13, and development management policy EI12. It therefore makes the **plan ineffective**.

The potential role of New Settlements in achieving highly sustainable transit oriented development

This is in no way a principled objection to new settlements. Far from it. Our representations to Government on proposed changes to national planning policy, our representations to other local plans (including that ongoing in the Forest of Dean), and our representations to the Stroud District Local Plan Review itself, all made equally plain that **we consider that planned new settlements, in principle, can and should be expected to play a significant and increasing role in meeting development needs.**

That is because, where new settlement site searches are steered towards existing and demonstrably deliverable high quality public transport corridors, they are frequently best able to secure, at all stages of build-out, a **better** range of credible of sustainable transport choices. For the same reasons they can often also best realise the opportunities to synergise with existing transport patterns and demands to secure very substantial uplifts in service quality, and thus relevance and effectiveness in competing as an attractive choice with car use, than other development options. This includes urban extension s, which paradoxically can often be quite hard to tie in to the adjoining urban fabric and into existing and potential high-quality bus service provision in particular, which may not even already be available in adjoining neighbourhoods.

New settlements can represent an excellent way of securing "transit-oriented development", where they are sited directly on existing and easily achievable high quality public transport corridors.

As we point out elsewhere, the new settlement option proposed at Wisloe Green, close to and directly linked to one of the District's two rail stations at Cam, and directly adjacent to the junction between the A38 and A415 which forms an existing and readily-improved bus service corridor, well represents just such a new settlement. A similar opportunity clearly exists East of Whitminster (Council Ref WHI014), on which the Council sought views formally at the end of 2020 in its Additional Housing Options Consultation.

However, **achieving very sustainable new settlement proposals is highly sensitive to location. They must be very closely aligned to existing major public transport facilities and services** as far as possible. Failing that, they should seek to catalyse new or really improved services by relating directly to **the existing broad patterns of travel demand along key road corridors that might credibly support new services. In the case of Stroud District, this is the A38.**

If new settlements are sited remotely from major off-site trip attractors, and worse still, off-line of any existing major transport flows and public transport corridors, with which synergies can be achieved, that their rationale can only be supported, in principle by two sets of assumptions, achievement of which is usually highly challenged, and challengeable:

- 1) That the new settlement will be **so self-contained** by virtue of its size and range of life opportunities, that there will be relatively little need nor desire to leave it.
- 2) That the new settlement by virtue of its size, can provide **an entirely new range of sustainable transport infrastructure and services, which are "stand-alone"**, have no such synergies with existing flows to support frequent public transport (potentially to multiple destinations), and make no contribution to enhancing sustainable transport connectivity or attractiveness to a much wider corridor or area.

Such new settlement sites represent not "transit oriented development", but rely on the precise opposite concept of that which NPPF and the Council's existing and proposed policy suite (at CP5, CP13 and EI12), and Stagecoach endorses. We might call it **development-oriented transit**. Decades of experience at all scales and in all regions of the UK (and no doubt beyond) show that this fundamentally manipulative approach to the development of public and mass transit modes in particular, if deliverable at all, **is entirely ineffective in achieving a sufficiently attractive and relevant service level to avoid exceptionally high levels of car use**. Faced with such low levels of use compared with exceptionally elevated costs of provision, the long term provision of any level of services is typically impossible to justify and sustain.

We are aware that some promoters seek to bypass this fundamental problem by positing a means of passing on these costs in perpetuity to residents through some kind of putative local management charge. A good example of this is the (still to be implemented) new settlement proposal at Dunsfold Park in Waverley, Surrey. **Merely making householders pay for services they are unlikely to regularly or ever use, doesn't make them more relevant or effective.**

It clearly does not overcome the tyranny of distance nor fundamental principles not only of transport economics, but known patterns of human behaviour.

Heyford Park: A Cautionary Tale

Before we go into more depth looking at the proposals advanced for Sharpness and the transport package evidence behind them, we can point to a new settlement proposal similar in scale and intent, and as divorced from existing high-quality public transport as it is from any higher order centres. Lying in Cherwell District in Oxfordshire, Heyford Park occupies a former Cold War airfield 5km drive west of junction 10 of the M40, about 11km north west of Bicester, and rather further from Banbury to the north-west and Kidlington (about 19km) and Oxford (about 26km) to the south.

The current consent accounts for just under 1100 dwellings, plus mixed employment uses and primary and secondary free school has also since been established. The site is now subject to an allocation and a live planning application for a further 1175 dwellings while adjacent parcels account for a further modest quantum so that site is expected to deliver about 2300 dwellings in total. Delivery commenced in 2015. About 800 homes are now occupied, and reserved matters have been submitted for all of the original outline consent.

In many respects the Heyford Park development started off in a greatly better place than does Sharpness. A long-established hourly bus service, now numbered 250, passes directly through the centre of the development site providing direct links to both Oxford and Bicester. This was already in place for the first residents. As a major USAF base it benefited at the outset from a substantial amount of local infrastructure that could be quickly and readily repurposed, such as the sports and welfare facilities. There were some established businesses and residents on the site.

The bus service had always been subsidised by Oxfordshire County Council. The hourly frequency requires at least three buses to provide off-peak – and this is optimistic. Reliability is challenging to maintain. Peak frequencies have to open up to a bus every 70-80 or so minutes. There is arrival in Oxford City Centre at 0734 and at 0845 with a peak journey time schedule at just under an hour. Really, 4 buses are needed to provide a robust offer. Since the withdrawal of all County funding for the supported bus network in July 2016, the continuation of funding for 250 has entirely relied on the developer funding from Heyford Park. The hope was that additional demand would evolve sufficient to at least secure the hourly service allowing the later phases subject to the current outline to look to catalyse a better and more relevant offer.

The operator of the 250 has consistently struggled both to operate the service reliably within the resource, or attract sufficient patronage to make the service viable on a minimum-subsidy price. In fact between 2015 and 2019, Stagecoach was apprised that no discernible additional demand

whatever accrued to the service from Heyford Park, despite occupations taking place steadily over the period, and 29% of homes being affordable tenures. In 2019 the operator served notice on the contract. A short term financial uplift was agreed, and then the service was re-procured by the County Council, at a higher price. The result is that the developer-funding budget for the service is being drawn down at a rapid rate, with no impact on travel behaviour from the site. This is causing all stakeholders some concern especially given that the policy basis for the allocation had assumed much more frequent bus services and Banbury as an additional destination.

The location of Heyford Park fundamentally compromises the attractiveness of bus service provision especially with the SRN so readily available. Demand from the site is split in all directions overwhelmingly to destinations that are at least 15 km away, and often much further, making the car the only realistic choice, and making it completely uneconomic to look at new bus services. Even where established bus service is available to Oxford and Bicester, the car hugely more competitive in convenience and journey time, even factoring in the use of Park and Ride at Oxford.

We are aware of several similar scenarios. Some, such as Mawsley near Kettering and Witham St Hugh's between Newark and Lincoln, benefit from no public transport service relevant to any other than school movements.

Conformity with the plan's objectives and Key Priorities

The huge influence of location on transport, and vice versa, is well recognised in Chapter 9 of NPPF that covers transport issues, which should be considered from the "*earliest possible stage*" according to paragraph 102, As such, transport issues are not and cannot be subservient to all other criteria driving the spatial strategy of a plan or consideration of specific development sites, especially large ones, if a plan strategy of a major allocation are to be considered soundly based.

Paragraph 103 goes on to outline how transport matters should steer the selection of spatial distribution approaches, and strategic allocations that would conform with those approaches. **To meet the definition of sustainable development** both plan strategies, strategic policies and strategic allocations must comply with this "first principles" statement:

"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."

Even this fairly broad and open-ended language is sufficiently clear that remote locations, that cannot realistically deliver alternatives to private car use, cannot fall under the definition of sustainable development.

A spatial approach that requires plan-makers **to fully leverage existing transport assets and services first, especially in the location of larger developments, is also explicitly mandated by NPPF.**

NPPF Paragraph 72 makes abundantly clear that the **size of development and the opportunities that scale** might offer to deliver new infrastructure or offer a higher degree of self-containment **cannot substitute for inherently poor, unsustainable location:**

*"The supply of large numbers of new homes can often be best achieved through planning for **larger scale development, such as new settlements** or significant extensions to existing villages and towns, **provided they are well located** and designed, and supported by the necessary infrastructure and facilities. ... strategic policy-making authorities should identify suitable locations for such development where this **can help to meet identified needs in a sustainable way**. In doing so, they should:*

*a) **consider the opportunities presented by existing or planned investment** in infrastructure, the area's economic potential and the scope for net environmental gains..." (our emphasis)*

The proposed allocation PS36 at Sharpness Vale is entirely out-of-conformity not only with NPPF at paragraphs 102-103 and paragraph 72, but locally-specific Strategic Objectives and Key Issues and the aligned draft policies in the plan, including two important Core Policies that are intended to achieve them. Specifically:

Closely reflecting NPPF language we have already highlighted, the **Priority Issues** in the this Regulation 19 draft Local Plan state at page 11 that the plan will achieve its objectives, and conform with the requirements of NPPF by:

"Ensuring new development is located in the right place, supported by the right services and infrastructure to create sustainable development, including by:

- *concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure;*
- *creating new sustainable communities at locations where development can transform existing access to services and infrastructure;*
- *concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth."*

Draft **Core Policy CP5** - Environmental development principles for strategic sites, point 3 accordingly states that strategic sites will:

*"Be **readily accessible by bus, bicycle and foot** to shopping and employment opportunities, key services and community facilities; and will contribute towards the provision of new sustainable transport infrastructure to serve the area, in **seeking to minimise the number and distance of single purpose journeys by private cars**" (our emphasis)*

Draft **Core Policy CP13** - Demand management and sustainable travel measures, states that in all development cases, schemes shall:

*"i) 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" (our emphasis)*

Draft **Development Management Policy EI12** states:

"All developments should be planned in line with the Sustainable Transport Hierarchy. In the first instance, opportunities to reduce the need to travel should be maximised, including through the provision of ancillary facilities on-site and through measures which enable people to work from home, such as high speed broadband. Development should be located in areas which are already well served by public transport and have access to a range of local facilities within walking and cycling distance."

Thus, the **plan strategy itself clearly seeks to avoid, from first principles, a contrived approach to transport and mobility.**

However, the allocation at Sharpness Vale evidently flies in the face of all this. There are very evident alternative options before the Council that much more clearly and comfortably align with and support the plan strategy and the delivery of its objectives.

It is very clear that the choice of so remote a site is fundamentally and highly problematic in the light of these national and local policy requirements.

Clearly, it will be often necessary to undertake measures to improve sustainable travel choices, both across the plan area and at specific sites, as this plan broadly seeks to do. This is a world away from "transport agnostic" strategies and allocations that have minimal regard to location, the transport implications, or the deliverability and effectiveness of achievable measures, as is the case at Sharpness Vale. **Sharpness Vale obviously diverges hugely in its conformity with and achievement of the plan strategy and objectives than any other proposed allocation.** We look therefore at this strategy and evidence below.

The voluminous transport material supplied by the promoter in support of the proposals is intended to indicate that the site can be made sustainable, in order to satisfy NPPF paragraph 102. This unavoidably looks to "retrofit" sustainable travel choices to an unsustainable site.

Achievability of the plan's objectives and Key Priorities

it should be immediately apparent that the almost complete absence of meaningful modal choices, and the exceptionally long distances to key destinations off-site, means as far as provision of non-car accessibility and mobility, heroic assumptions must be made for Sharpness Vale about:

- what is deliverable,
- when it can be delivered,
- how far it could be realistically economically provided and/or be sustainable,
- and how far it could be expected to be effective.

We therefore turn now to consider how far the proposals tabled for Sharpness **credibly could deliver** against the plan's SOs and key priorities. In line with the hierarchy set out at paragraph 102 of NPPF and mirrored in draft strategic policies DCP1 CP5 and CP13, we can break this down under

- first "reducing the need to travel" at all;

- then reducing the distance and energy implied in meeting mobility demands, and
- “making the site sustainable”: the effectiveness of the package of sustainable travel elements proposed in substituting for any, never mind many of others car-borne trip demands off-site.

We must point out that the actual package of sustainable travel measures set out in substantial documentation advanced by the promoter at two formal Regulation 18 stages and again at this Regulation 19 stage, has **very significantly varied. This is especially true of the assumptions made about the rail service that would be offered from the site.** It must then be concluded that the allocation of the site has relied less on evidence, and much more on a “grand visionary concept” regarding the railway, with very little weight given to what actual rail offer would or could demonstrably be provided, or when.

We and other participants can only for now work with the package of measures provided by the promoters in support of this regulation 19 consultation. Again, we are clear that the plan can only rely on developers assertions, with very little evidence of sponsorship or endorsement by the rail industry in particular, and overwhelming evidence for ourselves as the main commercial bus and coach operator in the County and District, that no credibly effective or relevant public bus service could be delivered from the site.

Reducing need to travel – Self Containment.

The promotion at Sharpness is highly reliant in the first instance on an exceptionally ambitious vision for self-containment.

While its sheer remoteness might help to support this, we would argue that much more likely, this will simply replicate existing behaviour elsewhere in this relatively rural district and beyond: an exceptionally high level of car use. The site also suffers greatly from having virtually nothing else already available on or directly adjoining the site on which early residents can rely: a fundamental problem with any entirely new settlement.

Gloucestershire County Council Highways have raised their own concerns in their Regulation 18 response about Sharpness. They have particularly *“highlighted the reliance on the PS36 New settlement at Sharpness providing a high level of trip internalisation. It is therefore vital that supporting infrastructure, such as shops and services, are provided in a timely fashion to minimise out-commuting and reduce pressure on the surrounding highway network.”*

Stagecoach has great concerns that the traffic modelling assumptions about trip internalisation at Sharpness are both is robustly derived and realistic. The modelling has assumed a very high level of self-containment at Sharpness involving a 18% reduction to residential trip rates in the AM peak and 10% reduction in the PM peak. This is said to reflect the on-site employment and secondary school.

However the delivery of substantial additional employment on or near the site is entirely speculative, as is the relationship between the housing trajectory and the point at which a secondary school is likely to be opened.

The residential distribution (Appendix H - Table H.1) reveals that the traffic modelling has assumed nearly a quarter of all off-site vehicle trips (23%) from the allocation at Sharpness (PS36) would be to be to the Berkeley area. Given how limited and how specialist the employment base in the area is, this seems a remarkably high figure. This pattern of local trip distribution has also been applied to the proposed employment at Sharpness with the employment distribution (Appendix H - Table H.2) showing 26% of vehicle trips are drawn from Berkeley.

We simply do not see those figures as being transparently based or realistic. They seem to have been “plucked out of the air”.

In fact these assumptions run themselves counter to the promoters own narrative. These draw heavily on the notion that much or most employment, looking into the future will be “home-based” wholly or in part: contentions that the COVID experience has given great credence to. However much of this narrative works on the assumption that most employment in the UK is office based, or office-like: professional, IT or administrative. This is far from being entirely true. Well over half of all employment requires physical presence, especially in education, healthcare and service delivery, even before scientific, manufacturing and other areas are considered.

Even where tasks can be performed remotely from home, this is unlikely to entirely obviate off-site journeys. “Hybrid” working was already stablishing itself before COVID, and in key markets we operate in this had already led to a disproportionate reduction in demand, and some traffic, on Mondays and Fridays. It cannot be assumed that home working will actually eliminate journey to work peaks – it

may well just mean there are fewer such days, but that demands on the network on Tuesday to Thursdays could well be close to or even exceed those seen in the past.

What is at least as clear from the National Travel Survey and other sources, is that **hybrid and home-working directly drives extensification of journeys**. Because commutes or work-related travel are lesser, people are ready to travel much further, trading this off against a better lifestyle in a larger property (necessary to support effective home working in any case) and a more rural lifestyle in more attractive surroundings. This does suggest that development at **Sharpness might be more marketable and attractive, than it might have been a few years ago. It certainly does not make it more sustainable, especially if fewer car journeys are more than offset by the length of those trips**. The DfT's National Travel Survey makes quite clear that a lower number of car-borne journeys has been more than offset by average journey length. This is one of the key causative drivers of stubbornly high emissions from road transport.

There is also some evidence that working from home perversely can redirect work-related journeys to other trip purposes; especially driving children to and from school. More and longer leisure journeys by car are already evident at weekends than prior to COVID according to data released by DfT in July 2021. People **working from home does not correlate directly to people staying at home**.

We also see little clarity on the matter of how high rates of internalisation will be achievable for other trip purposes. Primary education and convenience retail and grocery shopping would stand out here. While it would be possible for the developer to provide a village shop from the first occupation, or shortly afterwards, we do not see this either as a commitment, not as a development cost. Over a 10-year likely loss-making trading period (commercial convenience retail operators look for an exclusive hinterland of about 1400 occupations before they can see a business case to open a new store) could be substantial. Primary education lies outside the control of the promoter to provide, and early on-site delivery of this is entirely speculative.

This just involves the most basic of local services. A much broader range of choices to meet leisure, education retail and other social activity will be necessary on site or within convenient walking or cycling distance to make levels of internalisation close to the figures that are being suggested. With a virtually "blank canvas" the proposed allocation actually starts with a huge deficit in realistically-available services and amenities available without the car, at the point that it starts to be delivered. When added to its remoteness, the evidence point not to the proposals supporting a radically different kind of travel choice than local residents today, but a perpetuation of it..

Distance to Destinations

Both Core Policies CP5 and CP13 set out to ensure that the spatial distribution of development is such that patterns of movements are not extensified: **site should be allocated by the plan, then, to ensure distances travelled are minimised**.

This policy position is strongly reinforced by Gloucestershire County Council's Draft Local Transport Plan Review at Policy LTP PD 0.4 – Integration with Land Use Planning and New Development, bullet 1 which states:

"Development will be resisted (by GCC) where the impact on the transport network requires retrofitting or where safe and suitable access is not provided. GCC will support new compact, high density mixed use development of new sites already served by public transport over other more remote and inherently less sustainable locations" (our emphasis).

This strong policy steer is because relatively compact patterns of development so directly and greatly contribute to reducing the carbon intensity of travel and accessibility:

- For any journey of meet a given trip requirement the energy requirement and any carbon emissions associated therewith are proportionately and directly reduced, for any motorised mode.
- The potential for cycling greatly increases for compact journey patterns, and even for new settlements a short offset from key offsite destinations also makes it much more likely cost-effective provision of high quality cycling infrastructure can be delivered.
- In the same way, reducing the distance to key destinations makes the provision of high quality public transport greatly less costly, whilst also making it more attractive viz-a-viz the private car. If a single vehicle can comfortably make a round-trip between a site, including a new settlement, and key transport hub within 30 minutes, just two buses could provide a 15 minute service frequency on that route. A 12-13 minute end-to end journey time on such a route at such a frequency is highly relevant choice. As distances extend the cost of providing a given frequency multiplies. The relevance of the service rapidly reduces, especially since

bus services become less competitive with direct car journeys over longer distances because of running speeds and, typically, the increased number of stops.

It is starkly apparent that Sharpness Vale is exceptionally remotely located. In fact one not need to look at detailed data or modelling, to evidence this. The immediate locality was selected in the 1950s and 1960s to accommodate nuclear power stations, one of the primary consideration for which, apart from liberal supplies of water, was physical distance both from any significant centres of population, and major infrastructure.

The Draft Sustainable Transport Strategy acknowledges that Sharpness has an issue of relative remoteness (page 29), particularly in public transport terms. It is regrettable that it makes no real attempt - at this or any other point - to unpack why this presents a fundamental problem, especially for public transport economic.

This observation is echoed in the IDP (June 2021) at page 27, "*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.*" We agree, though again it is a shame that the evidence base does not emphasis why the tyranny of distance sets up fundamental and unavoidable difficulties for accessibility, travel behaviour and carbon emissions.

We offer our own evidence on the remoteness of this site, compared with other options, measured in terms not only of crude distance but of scheduled bus journey times achievable from the site. This is viewable in the table attached as **Appendix PS34 - 1**

From this it can be very readily seen that the closest credible bus destination is Cam: hardly a major settlement or powerful trip attractor, compared with higher order centres and nodes in the District as well as beyond it. Dursley beyond Cam, involves a bus journey that would take over 20 minutes. Even assuming direct limited stop bus services using the A38, and where appropriate, even the M5, it becomes very hard to provide journey times of less than 40 minutes from the site.

This contrasts starkly with the other proposed major strategic allocations. Of these, three around the Draycott and Cam area - PS37 Wisloe New Settlement, PS24 Cam North West (North West Draycott) and PS25: Cam North East Extension - also directly benefit from credible walking and cycling access to Cam for Dursley Rail Station. Here regular direct rail services north and south already exist, alongside the existing main bus corridor that we are equally clear could relatively simply be augmented based on consolidation of trip demands along it.

- ***Impact and relevance of the off-site travel options***

The promoter's strategy then aims to make alternatives to private car use so attractive there will be a preference not to drive, to virtually any off-site destination. This arises from a truly comprehensive and multi-modal offer which, for a scheme of only 2,400 dwellings, is certainly eye-catching. It needs to be, given how crippled the site is by virtue of its location.

The effectiveness of this offer is entirely speculative: no other site we are aware of has proposed anything like it. There is no precedent.

Voluminous material continues to have been produced on behalf of the promoter by its consultants at every stage of plan-making, and, especially with regard to the provision of an entirely new passenger rail line and service from the site, and scheduled bus/coaches, the proposals have very significantly evolved, to put it mildly.

This is set out in several documents published by the Council in support of this round of consultation, prepared by Stantec's Birmingham office on behalf of the promoter. Of these, we focus on the proposals in the **Sharpness Vale Highway Capacity Assessment September 2020. At section 3.18 a phased delivery schedule of transport measures is set out.** This is heavily circumscribed by caveats. We point to the statement "***Delivery of mitigation will be judged on a value-for-money basis, with consideration given to the environmental, resilience and sustainability benefits as well as the purely economic ones.***"

It is highly arguable how much meaning this statement holds. **Taken at face value it appears to mean that the promoter is committed to doing nothing specific.**

The Rail Service

For off-site travel the strategy set out at section 1.1.1.3 depends, first and foremost, on reintroduction of passenger rail services on the Sharpness Branch rail line. Without this, it is very arguable that the

promotion has even the most basic level of credibility. The deliverability of this service, and its effectiveness, is therefore of the essence.

This requires the reinstatement of passenger rail services along a freight branch line that is in current very occasional use. The remaining chord linking to and from the Birmingham-Bristol Main Line is north facing. That to the south, towards Bristol was lifted many years ago and the land sold. Some has since been built over. Accordingly, any service from Sharpness is much easier to provide in a northerly direction, and the promoter has proposed exactly this. The service would terminate at Gloucester.

This means that, as far as can be ascertained direct rail service would serve the intermediate existing station and Cam, and in the absence of a new station at Stonehouse (Bristol Road) would then run to Gloucester. This service would certainly be direct and fast to the terminal station. However, the range of journeys it could realistically provide seems very modest. The total trip assignment towards Gloucester from the site reflects the multi-directional split of demands to multiple potential off-site destinations. Trip assignment off-site is set out at section 7.1.2. of the Sharpness Vale Highways Capacity Study. Table 7.1 summarises the assignment of destinations. This shows that 13% are likely to see a journey to work destination in Gloucester. 13% seems a small minority, especially when the 38% of off-site trip towards the Bristol area is compared with it.

In fact, of those 13%, many will no doubt be seeking destinations such as Waterwells Business Park and Quedgeley, or Gloucester Business Park at Brockworth, literally miles from the station where a bus trip of about 30 minutes must be added onto the rail journey. It is not credible to suggest that that these journeys would eschew car use, when individuals are able to drive directly to the destination well within 30 minutes. By contrast, a multi-stage public transport journey even on a best case set of assumptions will take at least an hour to these destinations.

In truth **the rail link to Gloucester will offer relevant choices that are effective in substituting for car-borne trips, to a fraction of the 13% of peak off-site trips:** mainly those to destinations that are within immediate reach of the station by walking and, perhaps, by cycling. Fewer than 5% off peak off-site trips are likely to find it a meaningful choice. **95% of peak off-site trips will doubtless be seeking another option.**

To the south, the rail service will require a change of train at Cam. **If** a half-hourly service were provided on **both** the branch **and** main-line service, this might start to provide a relevant choice to parts of Yate, the immediate vicinity of Bristol Parkway, and Bristol's Temple Quarter and parts of the city centre all of which will collectively present a significant proportion of the peak and wider off-peak demands for travel from Sharpness. However this scenario is highly speculative. It is be extremely dependant on actual timetabling and the efficacy of connections at Cam, and associated waiting times.

As it is, the initiation of the half-hourly service from Sharpness has no date assigned to it by the promoter, on which any reliance can be placed, and even the aspirations for MetroWest Phase 2 have slipped. Much less clear is when the extension of MetroWest Phase 2 to Cam would be implemented, to provide a half-hourly mainline stopping service. A change of train might prove acceptable but in so doing, this erodes the time value of the rail offer substantially. To many destinations, especially in the Northern Fringe, where even accounting for quite severe congestion-related delays could be reached by car well within 40 minutes, it is hard to see how attractive and effective the rail offer would be compared with car use.

Contract Coach services

This provision could be supplied to any destination.

However, the evidence supplied by the promoter and set out at Sections 1 and 3 of the Highways Capacity Assessment focuses on the largely office-based employment destinations in the Bristol Northern Fringe. Further material submitted also propose a link to Gloucester City Centre via Oldends Lane, west of Stonehouse, that is major employment site. The Northern Fringe is a very extensive belt that sits within the Bristol M4-M5 Motorway Box accessible directly from as many as four motorway junctions. Herein lies the appeal of the car for such journeys. Once junction 14 on the M5 is reached, most of these destinations are as little as 15-20 minutes further drive, especially in free-flowing conditions.

The contract coach provision aims to provide a "bespoke" provision to the site, as close as possible to the destination, non-stop.

The promoter has engaged with Zeelo a company that has been established within the last few years to broker and sell these kinds of bespoke solutions. Generally, this has been driven by the needs of large employers with very heavy concentrations of employees, on quite inflexible working hours, on single very large sites. In many cases the employers have limited or no credible public transport provision, while on-site parking is insufficient and/or impossible to cost-effectively augment. These

include JLR at Gaydon, Warwickshire. A similar scenario operates at National Grid's HQ at Warwick Technology Park. The active participation and engagement of the employer at the destination has been a strong characteristic of this model.

About 35% of off-site peak demand is anticipated to be in the direction of South Gloucestershire. Combined, across the whole area, the Highways Capacity Study considers that a total 271 2-way person trips are anticipated from 2400 dwellings. However this demand, even if all were to be attributable to the coach provision, will be spread across a very large number of true destinations. "Demand-responsive" (i.e. charter) coaches might combine a few drop offs but are highly unlikely to offer any choice of departures at all.

In fact, the existing bus service 62 to central Bristol, which offers a single morning peak arrival, is broadly equivalent. It runs from Sharpness and Berkeley via Falfield non-stop via the M5 from junction 14, via the M4 and M32 to central Bristol. The relevant and impact of this service is such that in 2019, while we operated it, it carried a total, on average, of only **6.5 passengers a day** combined demand from Sharpness, Berkeley and Falfield. The pattern is also extremely erratic, for reasons that are hard to fathom. On many days, fewer than 2 passengers were carried. It may well be that work-related journeys are in fact the minority and it is being used for a range of more diffuse and discrete journey demands, probably those without easy access to a car. For example, out-patient appointments at the BRI are easily reachable at the terminus. It should be remembered that this destination, in terms of both scale and range of employment opportunities, set against the quite high cost and friction associated with driving, dwarfs any other for market potential for a non-car alternative. **This evidence suggests that the provision of bespoke contract coaches operating a similarly limited pattern of service is going to be very limited in relevance and impact.**

However one looks at the potential arithmetic within that broad overall demand figure, it will be entirely insufficient to sustain even single departures to key JtW destinations at a 2400-unit build-out, a point we have made previously in our representations. The only way such a service is likely to attract meaningful uptake would be for it to be virtually free of charge, and/or for physical measures to be taken to make it virtually impossible to leave the site in a single-occupancy vehicle before 0900.

While at certain points, such as at Appendix B of the Sharpness Vale Mobility as a Service and Express Coach Services paper, the promoter appears to be considering offering the coach services for an initial period free of charge, and then at a heavy subsidy, there is no commitment to this. It quite clearly rules out any restrictions on site on car ownership and use whatever.

Scheduled Bus Services

The applicant, despite the evidence before it and our own clear prior representations, continues to insist that feasible and relevant local bus services could be provided from the site, in some manner. These services are entirely undefined. Destinations, routes, journey times and frequencies have at no point been specified to date and remain entirely speculative at this Regulation 19 stage. The effectiveness of these service therefore cannot be evaluated.

We would suggest that a half-hourly service is the minimum level required to start to offer a degree of journey time flexibility. This should include a timetable coverage that starts sufficiently early and concludes late such that a variety of essential and discretionary trips can be made; not just shift work but, say, sports practices and evening socialising.

We would also suggest that where journey times to key destinations exceed 45 minutes, and also are more than double what would be achievable in a car, it is not credible to suppose that meaningful modes shift would be achieved in the absence of consistent and effective demand management measures in the wider locality and at key destinations.

"Mobility-as-a Service"

This very topical phrase, abbreviated to MaaS, has at its heart the idea that a single IT platform will create an ability to access any and all forms of mobility seamlessly, both in terms of planning and trip payment. The platform becomes the complete controller of the interface between the traveller and any number of suppliers of mobility, or any number of kinds. This mode agnosticism, innate personalisation and demand-responsiveness, and the "promise of universality" is simple and alluring. Implicitly and explicitly embedded within the narrative is the facilitation and commercialisation of a wide range of mobility options that are either innovative (here we would emphasis micro-mobility) and/or involve the shared economy.

The idea has been around for several years now and has led to significant investments by the technology/data industry. The apparent ability to transform mobility especially in urban contexts,

where the density of potential demand and also supply is much higher, has led to substantial public sector funding and support.

There is neither time, nor is this the place to embark a comprehensive exposition and critique of the relevance of this model, which will in time, and in certain contexts, no doubt offer substantial value to the public and will shape the way that service providers including Stagecoach engage with the market-place.

MaaS, and indeed any kind of demand-responsive data driven service intermediation tools, do not themselves supply mobility. What mobility can be supplied and ultimately accessed even by the most comprehensive and effective of such tools, depends at the most basic level, not on the MaaS application, but what forms of mobility can be economically and effectively provided by transport service providers of all kinds. The availability of service will depend, inevitably, on the level of demand and its geographical disposition.

The laws of time and space cannot be circumvented by MaaS: sparsely populated remote areas will never be able to sustain the same level of transport service availability and densely populated urban ones, or corridors in which a significant density of demand already exists.

This can easily be exemplified by the most basic forms of MaaS supply: lift-sharing, and ride-hailing apps (such as Uber). The density of demand in urban areas mean that ride-hailing apps can provide a car to a given point within minutes, and that supplier (the driver) is also much more likely to accept the ride given the likelihood they will be able to pick up another call close to the destination, within a reasonably short period after drop-off. The productivity of the service is relatively high and concentrated demands also mean that there are a large number of resources sustainable to meet that demand. Despite this, companies like Uber are far from universally profitable on ride hailing, and the challenges faced by suppliers meeting their true full costs of operation are also well-aided. Where demand is less dense, and journeys also extend in distance, the same problems faced by fixed public transport actually apply. Unit costs rise quicker than the opportunity cost of providing the service. Just like taxis, ride-hailing suppliers have no obligation to accept all requests and the longer the trip and the more remote the destination, the more likely they are to "pass".

The same is true for lift-sharing. It should be obvious that where there is a dense corridor where multiple individual journey paths align, often for a much longer-distance journey, the chances of finding someone prepared to offer a lift using a popular App like Liftshare.com, which has very large numbers of registered users, will rise exponentially. The "supply" available rises dramatically.

Looking at provision that closer aligns with bus services, "dynamic demand responsive transport" (DDRT or DRT) uses larger vehicles that seek to combine a larger number of discrete journeys on a single vehicle, with an automated algorithm adjusting route and pick up times to try to arrive at an optimised routing solution in real time. This is faced with exactly the same challenges as for discrete journeys, made even harder by the need to trade-off journey distance and time between multiple travellers. In sparsely-populated rural areas, this means that as calls on a single vehicle increase, journey time and circuitry of the "run" extend rapidly, to the point that while a number of people might reach their destination well enough, the time taken to get there becomes inordinate; or, additional booking cannot be accepted because the vehicle becomes over-committed. The broader and more diffuse demand, the quicker these problems arise. These issues are generally managed by tightly specifying a DDRT service around a particular corridor, or within a limited distance of a central "hub", constraining supply very considerably in time and space. The most successful DDRT systems such as Lincolnshire's CallConnect service, have succeeded precisely because they have found a way to clearly define and constrain availability in this way, to which they add a further rationing principle: "first come, first-served". The more remote the community the fewer DRT options are available in practice.

These realities have also conspired to ensure that globally, not a single DDRT minibus service that we are aware of has proven to be commercially sustainable in any format or in any context, urban or rural. The most relevant services, such as CallConnect, need ongoing sums of revenue support to be sustainable. The costs of provision always exceed revenues – a good sign that the chargeable value of the service to the customer is never sufficient to meet the cost curve.

Experience cross rural England shows that while providing well-designed DDRT services can suitably address demands for essential mobility, such as shopping and social trips, mainly for pensioners, and others who cannot drive, it can serve very little else. There is **no evidence that we are aware of the rural DDRT can or does substitute for significant numbers of car trips**. The service is insufficiently flexible (in terms of availability specially with limited notice), while if a trip can be booked close to the times required, the trip duration is typically much more indirect than it would otherwise be to drive.

The remoteness of Sharpness, and its distance from established flows of trips on the wider network, greatly undermine the ability of MaaS solutions and other forms of demand-responsive mobility, to provide relevant, attractive and thus effective substitutes for car-borne journeys.

However good **MaaS** applications might become – and there are huge issues in terms of commercialising them – they **cannot avoid the basic principles of transport supply and demand in sparsely populated and remote locations and how these affect service availability. They do not allow the Stroud Local Plan to depart from achieving the principles set out in NPPF at paragraphs 72, 102 and 103, or in the Local Plan itself at CP5, CP13 and EI12. It will not mitigate meaningfully against car-dependency.**

The Assumptions in the STM

In the light of the discussion above, we have further very serious concerns that the County's Strategic Traffic Model entirely unjustifiably over-estimates the impact of these interventions. For clarity, these modelling assumptions regarding mode share and trip discounting from single-occupancy are not derived within the model, as they might be if a multinomial logit-choice multimodal transport model were used. This would be a hugely more sophisticated modelling tool, and we concede that rarely are they employed in the UK, mainly because national policy, as well as professional practice, does not require this kind of evidence, given that traffic impacts continue to be the main basis on which transport policy and investments are justified. SATURN is a traffic model alone, and trip generation is simply discounted at the outset, to account for mode shift by a factor decided by the modeller.

For each strategic allocation including PS34 and PS36, to account for the impact of proposed sustainable travel interventions set out in the STS, such a reduction is applied to trip generation rates. Appendix K of the modelling report reveals that for trips to/from Gloucester and Bristol a 20% reduction has been applied for trips to/from the Sharpness site (PS36) to reflect the proposed "direct public transport services to key destinations including Bristol, Gloucester and employment nodes". This percentage reduction is significantly greater than all the other Local Plan strategic allocations where reductions of between 3% - 10% have been applied reflecting contributions and support for public transport services – despite the fact that for all the other SAs, a much greater frequency and choice of arrival and departure times will be available, and the length of journeys being that much shorter, will make bus services greatly more competitive with car use than it could conceivably be at Sharpness.

It is unclear why Sharpness has been assumed to have a greater potential for transfer to public transport than the other Local Plan sites, particularly given its isolated location away from the sustainable movement corridors, greater travel distances and the disparate range of credible employment destinations in particular.

Conclusions

For all these reasons, **the patronage and mode share forecasts for Sharpness Vale are simply not credible for any journey purpose.** They will exceed the highest peak bus mode shares recorded even in places like Oxford which benefit from long-standing vigorous car restraint at key destinations – mainly through the costs and availability of parking - and very high levels of service not just at peak times but seven days a week and late into the night.

The possible exception might be the railway – best able to address longer distance journeys – were it able to supply direct journeys to the bulk of key destinations. It cannot, even assuming that any way can be found to provide a half-hourly frequency from the site to Gloucester City Centre.

The promoters suggest that travel demand will follow the provision made available, and that with the provision of a direct rail service to Gloucester in particular, significant weighting of residential location choices will result in those with Gloucester City Centre destinations preferentially choosing to live at Sharpness Vale. As such the promoters in effect are starting down a truly extreme path of reverse logic: that providing a transport option to a remote and distant location is justifiable for its own sake.

We concede that the availability of such a service might be expected to have some influence – and were it the case that the employment market in Gloucester City Centre had the depth and breadth of a metropolitan city centre such as Birmingham or even Oxford/Cambridge it might allow the place to meet a significant proportion of needs arising in that labour market. It does not. Nor is Sharpness being allocated to sustainably meet Gloucester's housing needs. In any case, locational decisions for new-build properties in particular are typically made on the journey requirements of two working adults, not one, each of whom in this geographic context is likely to have very different destinations. In any case, competitive journey times are and would be available from locations much closer to Gloucester – including, where the railway is concerned, Cam and Wisloe Green. Why an array of closer and quite

probably cheaper housing options would be passed over to select a new home at Sharpness is very hard to fathom.

- ***Deliverability and sustainability of the sustainable transport package at Sharpness***

Before we even start to explore the matter in more detail, it must again be stressed that at full buildout the are expected to be only about 2700 new homes occupied (inclusive of Sharpness Docks) on top of the relatively small existing population. Even if we assume the most idealised achievement of both the development trajectory and the deliverability of any and all of the sustainable travel interventions proposed by the promoter, there is only a relatively small level of total demand available from which any passenger transport provision can rely.

Were the development able to synergise with existing travel patterns and demands, the scale of the Sharpness Vale proposals would represent a significant amount of additional demand to help consolidate and boost demand justifying higher levels of capacity and frequency – especially if much of it was to destinations on a single corridor running through or adjoining the site and extending in two directions away from it. Uniquely of almost all the proposed strategic allocations in the plan it cannot synergise with existing travel patterns or travel flows at all.

To add to this difficulty this trip demand is split in a wide range of directions, off-site, ranging from Cheltenham, Gloucester and Bristol.

Trip assignment off-site is set out at section 7.1.2. of the Sharpness Vale Highways Capacity Study. Table 7.1 summarises the assignment of destinations.

The specifics of the assignment are not broken down greatly; for example, how far within a Gloucester “head” this would account for trip to Brockworth and Quedgeley as opposed to the city centre, is not stated in either the promoters or the Councils’ evidence bases. The arithmetic of passenger transport economics of the site is thus even more savagely compromised: limited total demand is then assigned in such a way that only a relatively small fraction, or a limited pool of travellers, are available to sell any service to. This means that **achieving near 100% sustainable mode share is required for off-site journeys to generate meaningful loads even at peak times.**

But this then still assumes that demand to any given destination would be content with a very limited choice of departures. For the contract express coach services this would be a single choice journey from the site and returning to it. This offers neither flexibility nor robustness: compared with the ability to drive at will to the same destination, with the ability to return this offer cannot compete, especially if free parking is readily available at the destination. This is a reasonable assumption across the Bristol Northern Fringe and one that largely explains existing exceptionally car-dependent travel behaviour along the M5 from satellite communities of all sizes in South Gloucestershire and Stroud District beyond.

Rail Service

Others, including the County Council in their own representations at Reg 18 stage, have commented on this matter.

It is nevertheless appropriate for us to point out that Network Rail has barely been participant in the plan-making process. Great Western Railways as the principal Train Operating Company has made no public statement or endorsement of the proposals that we can find. Whatever statements might be being made to the promoter or the planning authority behind “closed doors”, it is necessary for a clear and public endorsement from the rail sector for any material weight to be given to the contention that any rail service is deliverable.

The baseline situation for rail is set out at section 2.2.3 of the Highways Capacity study presented by the promoter. This makes plain that track and signalling will need to be replaced to allow the resumption of passenger services.

We see that a recent application has been made by the Planning Authority and the promoter, under the “Restoring Your Railways Fund” for Government financial support to achieving the project. This has been to the “Ideas Fund”: an apt title indeed, in our view. This will, if successful, assist in the initial stages of assessing the technical and business case or the proposals, as far as Network Rail’s GRIP (Governance for Rail investment Projects”) Stage 2. This defines deliverable key outputs and a preferred option that would achieve them.

Importantly, nobody within the rail sector is eligible to bid for the Ideas Fund. Implicitly, such ideas therefore will be outwith anything that currently has formal rail sector sponsorship. While the guidance

document recommends that Network Rail and the relevant Train Operating Companies are approached, **no endorsement or sponsorship from the rail sector is either assumed or required.**

The Ideas Fund expects no due diligence. In the words of the current web-based memorandum "*At this stage, (DfT) would not expect you to provide estimates for infrastructure and operating costs for the scheme.*" The **submission to the Ideas Fund cannot then be taken as any indication that substantial feasibility work has been undertaken in any meaningful way.**

The kind of technical due diligence required to reach a level of definition at which delivery cost can start to reliably be attributed, is GRIP Stages 3 and 4, well beyond what even a successful RYRF Bid would provide for. We are apprised that South Gloucestershire Council has commissioned Network Rail to do this level of design work for reopening a station at Charfield immediately south of the District, the cost of which will exceed £1m. This work is ongoing.

A successful RYRF bid will, in future, get a scheme to GRIP Stage 2. The Transport Appraisal Guidance (published by DfT) has a formal matrix to assess the likelihood of scheme delivery. This is described within the methodology section of the Traffic Forecasting Report (March 2021) prepared by Mott Macdonald for the Plan, at section 4, table 4.1. **Where a rail scheme has reached only GRIP Stage 2, its delivery is assessed within TAG as "hypothetical". In this case the rail measures to serve Sharpness have not even reached Stage 1.** As such a TAG-compliant modelling process should place no weight whatever on their deliverability.

The RYRF Bid exposes, if anything, that the rail vision for Sharpness Vale in terms of evidence of practical deliverability, remains little more than a concept, that barely justifies being described as "hypothetical" under DfT transport appraisal protocols.

As many in the rail sector have already identified, there is a fundamental clash between having a "single guiding mind" for the railway, and it being more responsive to local interests and communities, as the Government intends, given they collectively hold a myriad of conflicting aspirations for the service that is provided, and the way in which finite track and station capacity is used.

Further, the impact of COVID on the railway revenue environment has been hugely worse, and longer-lasting, than on the bus sector. This poses fundamental economic issues for the railway in the medium and potentially much longer term that dwarf the challenges faced by bus and coach.

There is thus a higher level of uncertainty attached to rail investments now than there has been for many years. An extended transition period follows, and the outcomes in terms of process and protocol, much less the specific level of future services on given sections of track, will not be known before this Plan is at Examination. It is thus even more ill-advised to place weight on assumptions about the future size and shape of the railway over the Plan period to 2040 than it has been for the last 20 years.

The Long-Term Planning Process (LTPP) at Network Rail has undergone fundamental changes since 2018 as the result of the formal review of Network Rail processes and governance of rail enhancement undertaken by Hendy and Shaw. The LTPP looks forward typically about 6-7 years. Within the LTPP discipline a new Continuous Modular Strategic Planning (CMSP) protocol has been established. This has replaced the Route Utilisation Strategy (RUS) and Route Study processes that preceded it. The CMSP process has moved away from the traditional large Route Studies, aligned to 5-year Control Periods, towards an ongoing process of continuous planning that addresses more focussed "modules" that can be more targeted to specific lines and geographies, and bridge the 5-year Control Periods (the current CP6 ends in March 2024).

The latest position in Networks Rail's LTPP activity for the line is set out in the West of England Combined Authority 10-Year rail Delivery Plan dated December 2020. A Bristol-Birmingham CMSP Study that determines the feasible capacity of the line to accommodate additional service and frequencies started in 2020 and is believed to exist, having been intended for publication in April 2021. Unhelpfully, it is still not published.

The line is highly constrained in terms of train paths, for a number of reasons that are set out at high level within the Gloucestershire Rail Investment Strategy (GRIS), published in 2019.

There are multiple aspirations to improve frequencies on the Bristol-Birmingham main line both for long-distance as well as more local stopping services. Midlands Connect, the sub-national transport body covering the section of line north of Ashchurch, has aspirations to augment the long-distance function of the whole line as part of strategic connectivity between the West Midlands, Wales and the wider South West.

By contrast, within the County and further south, political aspirations are much more focused on improvement of intra-regional rail connectivity and frequency towards Bristol.

Alongside the CMSP activity, the Western Gateway sub-national transport body sets out its own aspirations in a Western Gateway Rail Strategy (WGRS). This was adopted in September 2020. This appears to set out a multiplication in additional service frequencies between Bristol and both Gloucester and Birmingham, both fast and more local.

Leading these aspirations in the GRIS is the extension of the anticipated "MetroWest Phase 2" half-hourly local service north of Yate where it is currently intended to terminate, to Gloucester to provide a half-hourly stopping pattern. This is intended for delivery in the period 2020-2025 as far as Yate with "extension to Gloucester under review". It has clear and longer-standing support from local authorities and the STB as well as parts of the rail industry, in contrast to reinstating some kind of passenger service from Sharpness, where there is no such endorsement.

Alongside the MetroWest-associated frequency uplift are continuing strong aspirations to open at least one, and potentially two new stations on the main line within Gloucestershire, at Stonehouse (Bristol Road) and Hunts Grove. Further, within South Gloucestershire, funding exceeding £1m has been passed to Network Rail to design a new station at Charfield to GRIP Stage 3/4, which is a deliverable feasibility design of a selected option. The combined market that these stations would address, for destinations both to the north and the south, would exceed that from Sharpness to Gloucester and any intermediate calls made, by a huge margin. Therefore, the business case for assigning any additional train paths to a through stopping service from Bristol to Gloucester would entirely eclipse that for a branch line serving the Sharpness to Gloucester market only, even assuming new stations at Stonehouse and Hunts Grove, which under such a scenario would offer very limited Bristol-bound service.

Longer term to 2030 and 2035, the WGRS has even more radical aspirations for frequency improvements that require multiple additional train paths between Bristol and Gloucester or Cheltenham. WGRS makes mention of multiple Restoring your Railways Ideas bids, but makes no mention of that submitted for Sharpness presumably because it was made under round 3.

Regarding the business case and technical issues surrounding a new branch service to Sharpness, it should be emphasised that Gloucester Station itself lies on a branch from the Bristol Birmingham Main Line. It has a primary station catchment of well over 160,000 people and is a major regional centre: considerably larger than Cheltenham lying on the main line. Bristol to Birmingham trains do not divert to stop at Gloucester, despite it lying less than one mile from the main line. It is largely reliant for connectivity on two, hourly services: one from the north; one from the south. If Gloucester cannot justify train paths sufficient to deliver an extra hourly service to Bristol, why does the applicant believe that two new train paths each way south of Gloucester are justifiable to serve Sharpness?

The relative deliverability and business case for a reopening of the Sharpness Branch Line are also covered, in context, by the Gloucestershire Rail Investment Strategy. As we cover elsewhere our representations, this work makes very plain that the economic benefit of this project relates entirely to the development itself. In other words, it has no justification other than to facilitate this particular development.

Whatever the actual capital and operating costs of the project, which are nowhere explored or stated, this presents the singular issue that **the opportunity costs of investing at Sharpness and then operating the service thereafter, are not conceivably likely to be justified when other projects that offer much greater value are considered. Even before the costs of the project and engineering risks associated with it begin to be meaningfully explored, this casts the greatest doubt on how far the plan strategy and the allocation of Sharpness Vale can rely on any rail provision in the foreseeable future.**

Those costs are likely to be exceptionally high, especially for development on the scale of that proposed, which is likely to be burdened by other substantial abnormal infrastructure costs, including servicing and drainage, and social infrastructure such as schools. The ability of the development to bear such costs is completely undemonstrated, nor can it be. It is entirely reasonable to state that the costs of reopening the line and providing the station would in all probability seriously compromise the development economics of the promotion. The lack of evidence supplied in this regard, in and of itself demonstrates the allocation is unsound, being **inadequately evidenced**, and to the degree the justifying narrative for the allocation implicitly depends so heavily on the rail provision, makes the plan **ineffective**.

We see no proposal for the development to bear the operating costs deficit for such a service which, given the size of the development, lack of population in the vicinity, and the small minority of trips for

which this might provide relevant option, could not conceivably close to covering the costs of operation.

It is as well to add that controlling the costs and delivery timescales of rail investment projects obviously continues to challenge the rail sector. Multiple government studies and the latest Williams Shapps Reform have sought to tackle this. Circumstantial evidence across England makes plain that relying on rail delivery time scales is highly risky, even where projects are fully sponsored by the rail sector and government, already committed and funding has been agreed. The proposals for Sharpness meet none of these criteria. Given that the site is intended to start delivering dwellings by 2027, the timescales for achieving a rail-based solution are, by railway standards, very ambitious, and ultimately speculative.

Local Bus Services

It is technically possible to provide scheduled bus services anywhere there are roads physically capable of accommodating them. There is no particular problem with Sharpness in this regard of course.

According to the proposed mobility hierarchy in section 1.1.1.3 of the Sharpness Vale Highway Capacity Assessment September 2020, road-based passenger transport will address residual off-site demands once the rail-based "mass-transit" demand is stripped out. For there to be any conceivable business case for a rail link – even a limited branch line shuttle terminating at Cam – this demands the bulk of off-site travel demands will be carried by rail. This further undermines the business case for any kind of passenger transport from the site that can foreseeably be envisaged. Indeed, it is unclear what destinations would be served by "extended and improved bus services", once demands to Cam and Gloucester were covered by rail, and to Bristol and the Northern Fringe by Contract Coaches.

The baseline situation for bus is set out at section 2.2.2 of the Sharpness Vale Highway Capacity Assessment.

Local bus services in the immediate area do not "ply their trade" as stated at 2.2.0. which implies they reflect some level of commercial logic and discretion. The single infrequent local public bus service is designed by and contracted by Gloucestershire County Council principally to ensure that a policy objective is satisfied, to provide for essential rural mobility. It is not designed to respond to identifiable suppressed demand, and it is intended to meet only needs for essential travel for those without access to alternatives. It therefore operates whether significant demand exists or not. The very low levels of patronage show the very limited relevance to the vast majority of local residents, reflecting both of low frequency, circuitous routing and extended journey times. This is typical for remote rural areas.

Figure 2.6 well demonstrates this for Route 62 with multiple route variations and diversions. This service (Berkeley-Bristol) which Stagecoach operated under contract until earlier in 2021, is now operated by Bristol Community Transport following re-tender.

School Bus services are irrelevant to justifying development on the site as they are either provided at Council expense to meet statutory requirements set by the Education Act 1944, or are provided in effect by parental subscription. They are in fact demand-responsive by definition, albeit scheduled.

Without a clear service specification, cost and likely revenues simply cannot be determined. However, given that the only destinations of any real account not explicitly covered by rail and contract coach are Stonehouse and Stroud, it might be speculated that a half-hourly extension of a core service between Wisloe and these places might extend to Berkeley and Sharpness.

Such a service would demand at least two additional buses, in the operating cycle especially if it is to circulate around the development, or extend to the Docks. This would require revenues of at least £300,000 per year to be sustainable at current costs, for Monday-Saturday service. Realistic yields would suggest that crudely 200 passengers per day would be needed for this service extension to break even. While this superficially looks quite unproblematic, in terms of what this means for bus modes share to these destinations from Sharpness Vale and its immediate environs, this is simply not credible, especially when the relative attractiveness of car for these journeys were compared. It certainly is highly inconsistent with the trip assignment and demand hypothesised in the promotional supporting material.

Contract Coach Services

This is the only part of the proposed provision where costs and a delivery path are spelled out in any depth.

We would say, to start, that the daily prices quoted by Zeelo to the promoter do look very realistic to us. These are set out at the **Appendix B to the Sharpness non-car Movement Strategy and Funding Appraisal**.

The proposals sought from Zeelo reflect the fact this solution is “easy-in”, but also “easy-out”. There is no need for a very long-term commitment. The proposals is made on the basis that a scaled introduction is feasible but, notably, that while the developer is seeking to provide initially free, and then subsidised travel, the intention is that this would be financially self-sustaining in time. It is notable that Zeelo itself takes no revenue risk. It is an intermediating service management contractor making a guaranteed fixed profit, unlike a commercial bus operator. The overall viability impact and fundamental business case of any service offered through them service poses no business.

The material submitted does make plain that providing peak-only coaches is not cheap. Adding the “managed service” cost on top of the operating costs adds to the price. These vehicles are relatively heavy, have a high capital and thus elevated depreciation cost, and as a direct consequence are also relatively costly to fuel. As a major coach operator we also find them more costly to maintain. This is the time of day when the calls on capacity, especially from school contracts, it at its highest. It is exceptionally inefficient to gauge fleets of large vehicles to operate mainly only for a limited period in the morning and afternoon. Whilst there would be some scope for operators to meet other off-peak demands, such as to distribution parks the long periods of downtime for vehicles and staff are unavoidable with this model.

As a result the range of costs to provide services is not directly well related to capacity: a 16-seat minicoach is priced at about £420 to offer two peak round-trips to Filton, up to about £580 for a 53-seater. These would provide 32 each-way seats and 106 each-way seats respectively. This would improve staff and vehicle utilisation substantially if a single vehicle can double-run. These prices seem to be offered based on this assumption.

Scheduled public bus services make use of this availability to reap such revenues as can be secured off-peak, and broadly speaking if these exceed the marginal costs of operation to any appreciable degree it is rational to do so. It also explains why so many double deck buses are observed lightly laden during the day: a high proportion of the operating costs are covered by peak flows, especially scholars. However it is not possible to deploy coaches in this way, which are not designed for scheduled local bus work.

It also makes clear that labour costs significantly affect the overall costs of operation. Use of smaller vehicles does not reduce costs greatly: in fact unit cost per set per kilometre are actually rather higher for smaller coaches. At every stage of build, therefore, a high proportion of seats need to be filled to cover the costs of providing the service at relatively high fares. The offer is not, in fact, very amenable to lower costs of operation during earlier phases. The developer cannot claim that this strategy provides a low-cost and highly scalable solution in the early days of the development.

To provide even single departures to a credible range of employment destinations is likely to require 6-8 coaches leaving the site per day, each carrying very low numbers. Combining destinations rapidly causes journey times to extend across multiple stops and also in the afternoon, makes services prone to unreliability: from a single employment return point a contract coach can at least be expected to be “on site” at a scheduled time, which is a key element of the USP of the Zeelo model. We note that the service design to Bristol actually combines multiple points, while that to Gloucester calls only at Oldends Lane, Stonehouse. As a result the journey time to Bristol in particular will be hugely extended; the 40-minute Sharpness – City centre journey time assumed in the proposal is clearly unachievable and reflects the fact that Zeelo is not a scheduled transport operator. With 5 intermediate stops and number of double runs into and out of key sites this would add at least 10 minutes just for site access and stopping times – and that assumes passengers are very brisk to board and alight from a high-floor coach.

Even once the development and the service offer has largely matured, taking the *per diem* cost of deploying a coach from the site to Bristol Northern Fringe is about £300 for a single round trip assuming that each coach would offer two round-trips, even a **£10** return average yield requires 30 seats to be sold to cover these costs: about a 60% load factor on a typical full sized 12m (53-seat) coach. This in turn suggests that for full-time office workers the **annual cost would be about £2500**. This is far from being competitive, or, indeed, for many workers, even affordable.

The proposals are actually assuming a daily round-trip fare of only £4. On that basis these services simply cannot come close to breaking even, even if running full, though we concede such a price point would start to look attractive, if the limited timetable offer was sufficiently attractive to give people confidence. Appendix B makes plain that **indicative “net” costs to the developer for each route, at that price point, will be hundreds of pounds per coach per day, even if they are on**

average 80% full. To achieve break even as the proposal was invited to set out, demands price points and levels of use that are simply unrealistic.

The Zeelo proposals makes plain that the remoteness of Sharpness and the nature of likely offsite destinations fatally compromises the ability to readily deliver relevant, marketable and effective options to private car use.

The fact that even a bespoke coach-based shared travel model - which by consolidating demands on a small number of larger vehicles ought to be most cost effective - can only demonstrate permanent losses at the most optimistic of use forecasts, ought to cause the Council very serious concerns. The baseline costs of the gap at 80% occupancy exceed £200/coach/day; about £50,000 per coach per year, as a best case scenario.

Addressing the funding gap

The promoter says virtually nothing about capital nor net revenue costs to provide the transport service to the site.

The Zeelo proposal we examine above is the only reasonably transparent attempt to explore these. The net revenue deficit for any rail service would be a multiple of this given the fixed and marginal cost of the railway are a multiple of those for buses and coaches. The rather casual way in which the promotion assumes the engineering deliverability as well as the funding of these measures can be "taken as read" as the plan is submitted for examination is entirely unjustifiable.

The promoter starts to talk about **innovative new funding models to address any funding gaps**. It says relatively little about this in the main body of its evidence, while absolutely no estimates are provided as to what the funding gap is likely to look like over the development trajectory.

However Page 26-27 Sharpness Non-car Movement Strategy and Funding Appraisal sets out how this gap funding would be addressed.

A "four-pot" system is proposed.

- First, it is suggested all residents would pay for the gap through a service charge. If the services offered were clearly good value and represented a fundamentally attractive alternative to car ownership and use for most residents this would, of course start to offer a credible mechanism. If the charge was affordable and relatively low, this would also be more likely to make the application of such a mechanism in the long term justifiable. Being forced to contribute at a high annual rate to a service or services they do not use or benefit from is an entirely different proposition. Transport services that are not universally relevant or enjoyed by all households to cannot be compared to the use of management charges to pay for communal areas and shared environment, that all residents making a choice to live on a development can realistically be expected to "buy into". The level of the charge is entirely speculative, reflecting the lack of evidence behind the proposals. However at the point that residents were to subsequently take control of the management company, it is very risky indeed to suppose that continuing to levy such a charge would be acceptable. In fact, the lesser the relevance or impact of the services, the more likely this mechanism and the services would be abandoned.
- Second, it is suggested that the developer itself would make contribution to pump-prime sustainable travel solutions from the site. This is already common practice and to be expected. Again, without any clear understanding and sense of evolution of costs and revenues for any provision, it is impossible to evaluate if these contributions would be affordable or sufficient per se, much less that a commercially sustainable provision could be expected.
- Third, MaaS charges are suggested. This refers to a subscription based model giving access through a single platform and intermediary to a wider range of provision. This model has been deployed commercially almost nowhere in the UK, and rarely beyond. Where it has, it is still its infancy. It has serious difficulties in terms of commercialisation. Irrespective, it should be obvious that the MaaS service value is intrinsically linked to the quality of provision. In remote rural areas the overall level of supply for any MaaS component is always going to be compromised on price, availability, or both, as we discuss elsewhere. MaaS charges are not over and above the cost of supply of the service, and typically the **MaaS provider actually takes a commission from the operator not the service user**, as the consultants ought to be aware. We do not consider this source of funding is a discrete source at all and rather is part of the final "farebox" component. The idea that people will pay a substantial MaaS premium simply because they "might" want to avail themselves of wider range of services one day was "tested to destruction" by WHIM in the world's first major roll-out of MaaS in Helsinki. The transport and travel market, while seeking to deliver increased personalisation,

is discovering that far from securing added value from “bundling” products, is in many respects headed rapidly the other way.

- Fourth the “farebox” – or payment directly linked to usage by the traveller. This is key: a service that people value will be one that is used and paid for.

It is ironic that the party controlling the site, a Registered Social Landlord, should be so committed to providing homes on a site so remote from opportunities, where the costs of accessing them becomes potentially so great that the effects of remoteness reinforce socio-economic disadvantage. **The idea that large number of affordable and social housing tenants can and should be expected to pay additional monthly sums for the privilege of living in an evolving new settlement, distant from not only employment and services but also family and social networks**, is a hard one to square with the purpose of the organisation.

The greatest part of the fundamental problem that the elaborate range of material supplied by the promoter is struggling to obviate is simply down to the remote location of the development: cost-effectively providing alternatives that could compete with private car use and secure enough use to be sustainable, is hugely compromised, while the relevance and impact of the provision is also always going to be weaker compared to more compact and corridor-centric patterns of development.

Any other allocation or credible alternative site to Sharpness would find it hugely cheaper and easier to supply a better transport offer across all the modes proposed for Sharpness, at much lower gross costs. In so doing they could (and no doubt will) each leverage existing demands to further support the quality and financial sustainability of the transport offer. In the case of capital projects, such as rail investments that are all but certain to require public money, they would secure a multiple better benefit-to-cost ratio, by leveraging existing demands in key corridors.

- **Traffic Generation**

The promoter at Sharpness Vale goes to extraordinary ends to argue that, in the view of its proposals that they claim will lead to exceptionally high internalisation of trips, with a range of non-car modes proposed to be provide, irrespective of their ongoing financial sustainability, to address residual off-site travel requirements, especially at peak, there will be no need for any significant need to provide additional highways capacity across the wider network. In fact the funding that might typically have been applied to this can be redirected at these sustainable options: clearly a radical idea and one that, taken at face value Stagecoach would in principle strongly support, if we could see that it would be demonstrably effective.

The promoter also advances material that attempts to show a “worst case” scenario where much lesser levels of internalisation and sustainable transport use occur. Section 4 of the Sharpness Vale Highways Capacity Study sets out “fallback” assumptions, in the event that virtually no sustainable travel measures are delivered. The report then works through in Sections 8 and 9, the “worst case” traffic generation that it considers could be expected with a view to demonstrating that these could be satisfactorily accommodated in any event. It concludes, unsurprisingly, that the immediate local network could nevertheless largely do so with modest junction improvements. The promoter reverts back to industry standard procedure: that sustainability far from being governed by NPPF as a whole, including the whole of Chapter 9 therein, simply needs to comply with a single phase at paragraph 109, that “cumulative unmitigated residual impacts” (on the highway network) would not be “severe”.

This is not a test of sustainability. It comes nowhere close to meeting the necessary standard of proof that the site should be allocated.

This analysis does not, interestingly, extend to cover key junctions likely to be used to reach South Gloucestershire in particular M5 j14 which operates over capacity for significant periods and with the pressure concentrated on tidal peak movements from the western side (am) and to the western side (pm). Development at Sharpness credibly ought to be considered to add significant pressure to this junction.

Leaving this aside, in a sparsely populated deep rural area, where the main employment at Sharpness Docks and at the former nuclear installations has greatly reduced if not entirely ceased, it should come as no surprise whatever that this traffic can be satisfactorily accommodated by a range of fairly modest local junction improvements, especially given significant road construction took place in the 1960s to serve the Berkeley nuclear power station site, and the A38 is a former trunk road that in many respects is wholly over-sized for typical current demands.

This work far from proving that the development is inherently sustainable, but rather demonstrates the contrary; the site is so remote and in so sparsely populated an area that it lies at a “watershed” of traffic origins and destinations, such that the immediate network is very lightly trafficked.

The tone of the Report intends to convince the reader that this "Fall-back" scenario is highly unlikely. Based on our deep and extensive knowledge of passenger transport economics, that extend well beyond local bus services, and detailed knowledge and experience of other large scale residentially-led developments brought forward across England over the last 20 years, we conclude that the overwhelming evidence before us is that something analogous to the Fall-back scenario actually is by far the most likely outcome, if the allocation is confirmed.

The folly of relying on August 2020 data in a study of this kind is evident in the statement at 4.0 that "rail use has returned to 40% and bus use to 55% of pre-pandemic levels". This statement is already wholly out-of-date and was actually quite inaccurate at the time.

In fact, rail use has generally at June 2021, not recovered to more than about 45-50% of pre-pandemic use. Bus networks have come back to more than double this figure in the vast majority of cases, and in parts of Gloucestershire, rather higher: in excess of 75% of use. Part of this is explained by the fact that the railway has been hugely reliant on peak usage for business and commuting purposes. Bus services, especially outside of the main conurbations, serve a very much wider range of trip demands.

The "fallback" assumptions demand a level of improved local bus service that is not specified. Its potential relevance is therefore entirely immune to proper consideration. It is posited that this will generate usage "consistent with other similar areas". Again, these are not discussed. We struggle to think of a comparable settlement of 3000 or some many newly-built homes lying so remote from key destinations and corridors, that offers any more than an hourly service. In fact no bus route serving even Dursley currently operates more than hourly. The best example is Mawsley Village between Kettering and Northampton with about 1000 homes where aside from school provision virtually nothing more is sustainable.

It is neither appropriate or necessary for us to scrutinise this in more detail, but it should be evident to all stakeholders that these models are based on a number of assumptions and forecasts, that are very hard to validate.

Other stakeholders and the County Council in particular also seem somewhat unconvinced so far by the material advanced by the promoter in support of this approach – although this has widely varied of the plan preparation period.

Gloucestershire County Council has undertaken its own modelling of the proposed Local Plan strategy, and the Sharpness cluster sites (that also include PS34 Sharpness Dock and two relatively small allocations at Berkeley, in its updated Strategic Traffic Model (STM). This is a SATURN model which is certainly well-understood and a highly familiar tool that is generally used to support the "predict and provide" approaches to dealing with development related traffic – for which read: "cars".

The IDP confirms that the STM identifies a total of eight 'pinch-points' within the Berkeley Cluster, although nine locations are included in the list. M5 Junction 14, which lies just outwith the County at Falfield to the south, is separately identified. This is consistent with the highway mitigation identified in the Traffic Forecasting Report, March 2021.

The IDP June 2021 states:

"Concerns are raised in the draft LTP that the B4066 and Alkington Lane which link the above site allocations to the A38 Bristol Road are not sufficient to support the levels of growth set out in the Local Plan Review. Corridor improvements remain a short-term priority on the B4066 in the Local Transport Plan." (page 28)

It goes on to say that:

"Although in South Gloucestershire, the transport model has indicated that the new settlement at Sharpness Garden Village may result in capacity issues relating to Junction 14 of the M5 and the B4509 which links the motorway to the A38." (p.29)

Highway mitigation in the form of a new junction at Junction 14 has been tested as part of the transport model. This work has been largely driven by historically-proposed strategic allocations at Buckover and Charfield within South Gloucestershire, and the scale of development currently subject to live applications in Charfield is such that this work has progressed since the west of England Joint Spatial Plan was withdrawn.

"A scheme to widen the A38 and the approach from the B4509 are also included within the highway mitigation. It is expected that development within the vicinity of the junction would provide financial contributions towards addressing capacity issues in this location."

However, consistent with the wider deficiencies we identify in the transport evidence base, no delivery plan or costings have been published. How these interventions and their delivery relates to the housing trajectory on page 306 of the Reg 19 Plan is entirely opaque.

Conclusion

In the light of the discussion and examination of the evidence available, Stagecoach regrettably concludes that the allocation at Sharpness Vale (PS36 Sharpness New Settlement), is unsound on all counts defined in NPPF. We see no remedy for this, as the problem is entirely the result of the location of the development distant from existing settlements, other economic activity, and key existing movement corridors. It demonstrably **cannot be made sustainable**.

The proposed allocation is **contrary to national policy** at NPPF paragraphs 72, 102 and 103.

The proposed allocation undermines achievement of the Plan's Strategic Objectives and Key Priorities, in respect of transport and carbon mitigation, and the spatial strategy of the plan, most clearly expressed in draft Policy CP5, CP13 and EI12, making the plan **ineffective**.

No cost are set out for the packages of mitigations proposed for the development and thus the proposal is inadequately evidenced and thus **unjustified** in this and some important other respects.

Of these, the lack of any explicit support, endorsement or confirmation of deliverability for any element of the public transport strategy from any relevant infrastructure provider or transport operator, either directly or through publicly-available strategies and funding prioritisation statements casts **fundamental doubt on the deliverability** of much of the transport strategy in support of the proposal.

The rail infrastructure and rail service is the particular "point of difference" that might, *in extremis*, start to make the location look appropriate. The particular evidence presented to support these elements is especially weak. In addition, the powers that the developer and any local authority has to influence, much less effect such interventions is minimal. Such evidence that is available such as the Gloucestershire Rail Investment Strategy and the West of England Rail Strategy make clear that both the actual as well as the opportunity costs look very unlikely to support the case for such an intervention. The allocation and the promotional narrative behind it therefore remain essential conceptual and speculative. The proposed allocation is **thus unjustified**.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy PS36 fundamentally compromises the soundness of the plan. **It should be deleted as it is a fundamentally unsustainable location that cannot be made sustainable.**

This begs an alternative new settlement site, since we recognise, as does the Council, that alternatives that extend existing settlements, and previously-developed land within existing more sustainable towns and villages cannot accommodate the remaining development needs of the District in full.

An alternative new settlement project or projects will need to align with the existing evidence base and clearly support and deliver the Key Priorities and Strategic Objectives of the plan in a way that Sharpness evidently cannot.

As a replacement site, Land at Grove End Farm, Whitminster (SDC Ref WHI014) has already been formally consulted upon by the Council in its Additional Housing Options consultation in December 2020, as one of two possible additional strategic new settlement options, the other

being a series of land holdings east of the A38 around Moreton Valence a short distance south of Hardwicke. This indicates clearly that the Council recognises these are two of the most credible options, that could align well with the plans strategy and help to secure its objectives and Key Priorities.

Of the two additional site options offered for comment by the Council, we have clearly indicated to the Council that we consider Land at Grove End Farm (reference WHI014) to be much preferable.

We understand that the land under promotion has the capacity to accommodate 2,250 dwellings and employment land which makes it capable of meeting the Council's residual development requirements to a very great extent within little need to look to disperse development more broadly.

We have ourselves, at all stages in the plan-making cycle, consistently highlighted the potential at Whitminster, in a highly sustainable location. While the A38 through Whitminster is already identified by the County Council and the Council as a Sustainable Movement Corridor, we will be substantially amending our core network from September 2021 to operate a half-hourly service between Gloucester, Quedgeley, Whitminster, Stonehouse (passing very close to the major employment cluster at Oldends Lane) and Stroud.

This route passes or runs well within convenient walking distance of a very wide range of secondary schools, Gloucester College, Gloucester Quays, and employment sites at Hardwicke Quedgeley and Bristol Road. Most of the destinations would be reached with a journey time of less than 30 minutes from Whitminster. This because Whitminster sits between Quedgeley and Stonehouse and as such offers destinations in both directions on the route. At the same time its location benefit from ensuring that journey times to a wide range of destinations are not extended.

Figure 1 from the Draft Sustainable Transport Strategy demonstrates the location of Whitminster at the hub of the identified movement corridors in the STS, where integrated packages of initiatives can readily and demonstrably be delivered. Its strategic location is probably one of only three locations in the plan area that is likely to be able to "*showcase multimodal use with a focus on sustainable travel modes*": The Site at Whitminster is exceptionally well-placed to support the plans policy approach set out at CP5, CP13 and EI12, being located at the confluence of the A38/M5 and A419 corridors. It therefore sits on and can facilitate the development of a multi-modal node at this key intersection. This mean that the site is likely to further benefit from public transport improvements along the A38 from Cam and Dursley to the south. The current hourly service diverts via Eastington but it is neither necessary nor likely to be advantageous for all journeys to do this at the point bus services frequency from the Dursley/Cam/Wisloe area towards both Stonehouse/Stroud and Gloucester is improved.

This interchange potential is recognised by the County Council within the Draft LTP Review. It could also include the ability for longer distance coaches to quickly leave or rejoin the motorway. The site could credibly help to facilitate this.

There is a wide range of evidence before the Council including the Employment Land Review, indicates is also attractive to the market, and aligns with the clear evidence from the GFirst

LEP that seeks to ensure employment needs are met having good access to the M5 at key junctions.

The other two obvious localities where sustainable transport infrastructure and services can be catalysed to strongly support the plan's development strategy and achieve its strategic objectives and key priorities are around Cam for Dursley Station (including Draycott and Wisloe) which is already identified in the plan for strategic development; and conceivably in the Hardwick area.

The plan already identifies land at Hardwicke Green for strategic development in this locality. This might suggest that Moreton Valence is also a good option.

Unfortunately, Moreton Valence does not sit anything like as comfortably as Whitminster next to the A38 in a manner that, within the land believed to be available, allows for the development footprint to accommodate an especially attractive or efficient bus diversion. It is also a rather smaller site, the capacity of which is less well defined. While it is nearer to employment and facilities at Quedgeley and Gloucester, once the whole journey time budget is considered, this would not be more than 5-6 minutes difference; by contrast, journey times to the south would be extended a similar amount. It would be much less readily able to benefit from proximity such that cycling offered a credible option than Whitminster. Development at Moreton Valence lies south of the busy B4008 dual carriageway connection between M5 junction 12 and the A38, which presents a high level of severance. By contrast, development at Whitminster can clearly take advantage of Grove Lane which provides a natural quietway directly towards key destinations east of the M5.

A suitable, achievable site for an efficient multi-modal hub that draws together range of bus and longer distance coach services minimising diversion and circuitry is not identifiable at Moreton Valence, nor do we understand that it is proposed, contrasting with at Land at Grove Farm, where this important potential has already been identified and taken up by emerging proposals.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

 Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

See comments set out in our representations regarding the pan strategy and evidence base.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date: