

# Stroud District Local Plan Review - Examination Pause

## Technical Evidence Consultation

### Survey response form

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The Council cannot accept any representation without a first and last name. Any representations received without this information will be marked invalid.

#### Data Protection

In submitting a representation you understand that a copy, including your name, will be made available to view on the Council's examination website. Other personal information will be redacted and will be managed in line with the [Planning Strategy Privacy Statement](#). A copy, including your name, email address and/or phone number will be passed to the Planning Inspectorate and to the Programme Officer responsible for administering the examination.

#### Making comments

In their letter dated [5 February 2024](#), the Inspectors stated that only parties who submitted duly made representations at the Regulation 19 consultation stage of the Plan are invited and eligible to respond.

If you are unsure whether you are eligible, please contact the programme officer Charlotte Glancy at [banksolutionsuk@gmail.com](mailto:banksolutionsuk@gmail.com) Tel: 01903 776601 M: +447519 628064

The consultation is limited to only documents EB133 - EB137 which can be viewed [here](#). Comments on other documents will not be accepted.

#### Consultation period

The consultation will run for 6 weeks until **5pm on Wednesday 23 October 2024**. Only comments received during this period will be considered.

#### Completed forms

Please submit completed forms by email: [local.plan@stroud.gov.uk](mailto:local.plan@stroud.gov.uk) or by post to: Local Plan Review, The Planning Strategy Team, Stroud District Council, Ebley Mill, Stroud, GL5 4UB

**Strategic Road Network (Please read documents EB133a, b & c)**

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

No comments on M5 Junction 12

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

No comments on Junction 12.

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

It is considered that there are issues of soundness in respect of the technical evidence provided to address the Inspectors fundamental concerns as set out in their letter of 4<sup>th</sup> August 2023. At the time the Inspectors stated that *"the evidence does not clearly set out when the improvements would be required during the plan period and how they would be funded and secured. We consider that convincing evidence on these points to be fundamental to the soundness of the Plan."* (my emphasis)

The Inspector's in their letter of 4th August 2023 at that stage indicated that their concerns were so fundamental to the Plan as a whole that these were not matters that could be addressed by an early review and also recognised even then how long it would take to progress the necessary additional evidence:

*"..., particularly in relation to the successful securing of external funding bids and determining when the infrastructure would be delivered, we seriously question the usefulness of allowing a delay to the Examination which could be for an extensive period."*

Since the Inspector's letter of 4<sup>th</sup> August 2023, 12 months has already passed, and the examination is not anticipated to resume the hearing sessions until Spring 2025, this is a considerable delay to the Plan when the end result in terms of the technical evidence provided does not address the fundamental concerns the Inspectors originally identified (in terms of securing external funding and the determination of when the necessary infrastructure would be delivered) .

We are aware to the Ministers letter of 30<sup>th</sup> July 2024 to The Planning Inspectorate outlining the Governments concerns about the increasing length of time local plan examinations are taking and setting out the Government's expectations on how examinations should be conducted. *"Pragmatism should be used only where it is likely a plan is capable of being found sound with limited additional work to address the soundness issues. Any pauses to undertake additional work should usually take no more than six months overall. Pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall..."*

*"this new approach will apply to plans with immediate effect. Existing pauses already agreed should remain in place..."*

We have set out below that after the pause, which has been more than six months and which also took several months to agree, there still remains fundamental issues in respect of securing the external funding and the delivery timescale which have not been addressed, therefore this undermines the effectiveness and soundness of the plan.

Whilst the technical evidence attempts to set out what improvements would be required to M5 Junction 14, it concludes at paragraph 1.4.3 of EB133a that *"there are limited alternatives to the delivery of major junction improvement schemes to adequately plan for growth. Smaller scale/interim schemes have been considered but are insufficient to fully meet the needs of the region."*

Having concluded that a major junction improvement is necessary, the fundamental issue which the reports fail to address is external funding and the delivery and timetable for the major improvement to junction 14 of the M5. The report outlines the need for the major

scheme, the highway design and modelling, and the cost estimate, but it fails to provide any timescale for the delivery. The timescale and build programme are critical to the delivery of the Sharpness and Wisloe sites that are proposed allocations in the Stroud Local Plan and therefore without this critical information this raises fundamental issues of soundness of a Local Plan that includes these sites.

The report (EB133a) in the Construction and Traffic Management section sets out that there are 6 phases, (and detailed design works in Appendix D) but this does not correspond to any timescale with dates etc.

Whilst the micro-simulation modelling ( Section 2.7 of EB133a) has confirmed that the proposed grade-separated roundabout will be able to accommodate the forecast level of traffic resulting from the SDC LPR, in 2040 with all Local Plan sites and that the mitigation is effective for the plan; once again there is no timescale for the funding and building of the junction – this therefore undermines the delivery and soundness of the Local Plan.

There are also significant concerns about the Order of Cost Estimate (OCE) in Section 3 of EB133a.

EB133a concludes that the cost of the M5 Junction 14 will be in the region of £110m at 2024 prices. ENB133b states that given the scale of the costs involved the funding for the M5 junction improvement will need to be from multiple streams. *“it is currently envisaged that the schemes would be the subject of a funding approach to Central Government, and that circa 15% of the funding would be generated from local contributions e.g. from allocated developments through the Development Management process.”*

This leaves 85% to be funded from other sources and reference is made to the scheme being subject of a funding approach to Central Government. This raises many uncertainties about the timescale and the process to be undertaken to secure such funding.

Government spending on England’s strategic roads, including motorways, is secured through the Road Investment Strategy (RIS) process. It is funded from the National Roads Fund (NRF), equal to all receipts from Vehicle Excise Duty. A RIS determines National Highways’ programme of improvements and works to the SRN, and the budget available to deliver it. In practice, each RIS covers a five-year span known as a “road period” (RP). The current RIS is RIS2: 2020 – 2025, which committed the Government to spend £27.4 billion during RP2. M5 Junction 14 is not in RIS2, nor is it identified as one of the pipeline schemes, which are schemes that are identified through National Highways programme of strategic studies, route strategies, specific areas of research and work with stakeholders.

Two examples are given where funding has been secured outside the NH funding process, however, one is subject to a Growth Deal- Preston. The Preston and Lancashire City Deal was an agreement between the Government and four local partners: Lancashire County Council, Lancashire Enterprise Partnership, Preston City Council and South Ribble Borough Council.

*“A total £434m new investment will lead to the expansion and improvement of the transport infrastructure in Preston and South Ribble at an unprecedented rate, enabling a forecast 20,000 new jobs and 17,420 new homes to be created.”*

From the time funding was secured in 2013 through the City Deal, it took 10 years to complete the junction. What we don't know is how many years it took to secure the funding through the deal.

There remain unanswered questions in terms of the land costs, EB133a paragraph 3.3.1 states: "At this stage, the amount of land that would need to be purchased is unknown and consequently the value of that land cannot be known until the scheme is finalized and the land negotiations are progressed" – **so without this information how can the scheme be considered deliverable?**

It should be noted that the OCE paragraph 3.3.3 does not include the implementation of the A38/B4509 junction as this is a separate scheme (this was mentioned in the Infrastructure Delivery Plan for the Local Plan). Whilst the report at paragraph 4.1.6 states: "The scheme has been developed to show that there is an improvement available for the junction, although this would be subject to additional design optioneering and consultation prior to being finalised and delivered." However, there is no detail on the timing of this scheme, and it is assumed that this is required in order for Junction 14 to work.

The summary at paragraph 4.1.7 concludes that the "proposed scheme" for M5 Junction 14 and the A38/B4509 is effective mitigation for the Plan and the residual cumulative effect of the Plan, and its mitigation is not severe in accordance with the NPPF (paragraph 115 NPPF Dec 2023). However, this may be the case in theory, but the report fails to state how and when this will be achieved and does not set out the process and timetable for the delivery of the Junction 14 improvements. Consequently, this undermines the effectiveness i.e. the soundness of the Plan.

### **EB133b Scheme Proposals**

Paragraph 2.2.3 states that in respect of Junction 14 that "National Highways considers any new development which adds to J14 will be unacceptable." However, the very next sentence appears to be in direct conflict with the NH views of the M5 J14 and in direct conflict with para 1.4.3 of EB133a which states that "there are limited alternatives to delivery of major junction improvement schemes to adequately plan for growth. Smaller scale and interim schemes have been considered, but are not sufficient to fully meet the strategic needs of the region" This is re-emphasised in paragraph 2.2.5

EB133b states that without the adoption of the SDC LPR then the capacity constraints will remain. However, even with the adoption of the LPR it is clear that there is a significant shortfall in funding as only 15% would come from local contributions (paragraph 1.2.1 of EB133b) and there is no certainty or timeframe for the delivery of the junction improvements within the plan period.

Developments would NOT come forward on an adhoc basis as NH has already clearly stated that such applications would be subject to a holding objection. Paragraph 2.2.4 appears contradictory.

Although the preliminary scheme has been produced for M5 J14 it does not provide confidence to the relevant highway authorities, as there is no timescale for the delivery of the scheme in the plan period to enable the delivery of sites to come forward and there is also significant uncertainty in respect to the funding i.e. 85% shortfall.

Design is only the first step, the funding and delivery timescale is critical to providing an effective (sound) local plan, basically without this information sites will not be able to come forward and will be subject to holding directions from NH. The housing trajectory will fail to deliver what is required to meet housing needs set out in the Local Plan. In summary the Plan as currently proposed is not sound and cannot be implemented.

### **EB133b Section 3 Funding from Local Contributions**

It is clear that there is a funding shortfall as there will only be 15% from the local contributions, the shortfall is 85%. Paragraph 3.1.1 states that contributions will be secured from local development – the *“approach builds on the work undertaken for the Funding and Delivery Plan”* (ref examination doc EB109 July 2022 which Pegasus submitted reps on behalf of Robert Hitchins Ltd in October 2022)

Paragraph 3.2.4 refers to a revised methodology to calculate the proportional distribution of funding for the M5 junctions has been prepared. The revised methodology for calculating the proportional distribution of funding for the M5 junctions has removed the 5% threshold in terms of impact. This has resulted in sites that were previously not included as impacting/contributing to motorway junctions now being caught up, i.e. NW Cam. The revised methodology should not result in development in sustainable locations being prevented from coming forward.

### **EB133b 3.3 Local Development Funding Scenarios**

It is not clear what is meant in paragraph 3.3.1 when reference is made to *“it is assumed that regional local plan allocations will need to contribute to at least 15% of the total schemes costs...”*

This implies that there are sites outside the Stroud District Local Plan that will contribute to the 15% of the costs. This raises more uncertainty about the timescale for contributions e.g. which sites outside the district are expected to contribute? At what stage are these sites, potential applications in emerging local plans? EG South Gloucestershire emerging Local Plan has only recently completed a fourth Reg 18 consultation – there are no sites proposed in the vicinity of M5 Junction 14. EB133b at paragraph 4.2.8 confirms this is the case.

South Gloucestershire are aiming to undertake a Reg 19 consultation and in advance of the new NPPF to benefit from the transition arrangements in which case their housing figures will be based on the current standard method.

Figure 3.1 illustrates the worst-case scenario where 100% contribution is expected from SDC and no contribution from other local authorities. It is noted that it is this scenario that it progressed for onward viability testing, so there is obviously considerable doubt by the authors of the report that any funding will arise from sites outside Stroud District in respect of J14.

An objection is made to the sweeping statement in paragraph 3.3.3 that:

*“In practice, it is considered more than likely that some funding would be attributable to growth within these local authority areas (i.e. as per the ‘Core’ scenario), to be secured through the development management process. This is especially the case*

*given the Government's recent changes to housing delivery targets and requirements which may mean that neighbouring authorities are required to reconsider the level of growth they are allocating within emerging development plans. However it is acknowledged that this remains an unknown at this point. The 'Worst Case' scenario is intended to show a scenario where the SDC LPR is the sole source of local funding and there is no reliance on funding from development in other local authority areas."*

**This is very unlikely as applications will be subject to a holding objection from NH.**

Within the timescale for the delivery of sites in the SDC LPR, there can be no reliance on the proposed changes to the standard method for neighbouring authorities – these changes will need to be addressed in emerging Local Plans all of which are some way off Reg 19 etc. and will follow the due process, so will be some years behind the SDC LPR.

#### **Section 4 Strategic Funding Case**

This section acknowledges that the junction improvements required to the M5 are required not only to delivery sites proposed in the SDC LPR but would also be required as critical infrastructure investment to the wider strategic route network. However, the strategic case for major infrastructure investment requires years of preparation and promotion e.g. the RIS

An example is M5 Junction 10:

M5 Junction 10 improvements are being funded by the Government's Housing Infrastructure Fund (HIF). Gloucestershire County Council is the project sponsor. It has been working for over a decade on proposals for an upgrade to the junction. A steering group was established in 2013. Following an expression of interest to Homes England in 2017, a bid for HIF funding was made in 2019 and £219 million was secured in 2020. Following a process of consultation, technical work, studies and design an application for a Development Consent Order (DCO), required for Nationally Significant Infrastructure Projects, was submitted to the Planning Inspectorate in 2023. The application was accepted in January 2024. The Planning Inspectorate has up to six months to carry out the examination following which a recommendation is made to the Secretary of State for a decision to be made. This is anticipated to be in 2025. If successful, the works could commence within a year and be completed within around two years. The timeline for M5 Junction 10 suggests around 15 years from optioneering to implementation, following a successful bid, for this scale of infrastructure works.

EB133b Paragraph 4.2.2 refers to the newly elected Government and the objective of increasing housing delivery which is key to economic growth and consequently strategic mitigation at M5 J12 and J14 is required to unlock housing in Stroud and the wider region beyond current forecasts.

It is considered that if the evidence concludes that strategic intervention is required then this must be part of a wider proposal for the SRN and as such a programme of funding etc from Central Government – however, to date no evidence has been provided to the SDC LPR examination of any strategic business case etc, timescale to obtain funding etc

Paragraph 4.2.8 confirms that South Gloucestershire are not considering any sites which would impact on Junction 14 and as such will not be looking to secure improvements to

the motorway junction.

This was stated clearly at a Cabinet meeting on 13th November 2023: in the Reg 18 LP Phase 3 Towards a Preferred Spatial Strategy.

*"5.19 A key factor which has influenced the choices we have made is that sites that require supporting infrastructure will need to demonstrate they can deliver this over the 15-year Local Plan period that ends in 2040. Sites which would require infrastructure that currently have no demonstrable pathway, support from key stakeholders, national bodies or funding routes creates huge risk to communities, the council budgets and long-term creation of high quality, sustainable places. Where sites are predicated on the delivery of large infrastructure projects, where public funding has not been agreed or looks currently not capable of being agreed, this will also present a risk to the delivery of new housing and employment. It will also make it more challenging to ensure the council is fully policy compliant with the level of Affordable Housing provided."*

Therefore, it is purely speculation to imply the South Gloucestershire would consider otherwise.

Paragraph 4.2.9 refers to revised housing targets and delivery and Table 4.1 includes some selected authorities in the South West – however whilst the Government have announced proposed changes to the standard method for the assessment of housing need there are transition arrangements set out in the proposed changes to the NPPF and therefore it will some time before these proposed housing numbers are included in Local Plans and consequently will not immediate impact the Stroud Local Plan. All of the Local Authorities listed in Table 4.1 are not at an advanced stage of local plan making (with the exception of Bristol City Council). It is therefore premature to assume that there will be an increase in the number of dwellings which will support the delivery of J14 in the timescale required to ensure that the sites in the SDC LPR are deliverable. This does provide the confidence required to support the SDC LPR.

Paragraph 4.2.12 is misleading as it states that *"The proposed increase in housing need by 30-40% over the "current" requirements will accentuate and exacerbate the impact of this barrier to local housing delivery unless strategic mitigation can be delivered."*

The standard method figure for the South West shows a 30.09% increase – this includes all authorities in the South West i.e. including those not listed in the table.

### **Section 4.3 Western Gateway and Severn Edge**

Severn Edge is promoted by Western Gateway as a Low Carbon Energy Park / Hub based at the site of two decommissioned nuclear power plants at Oldbury-on-Severn and Berkeley.

Paragraph 4.3.7 refers to *"conversations are ongoing with other potential investors and developers of the energy infrastructure at this location"* i.e. Severn Edge, but there is no certainty about contributions and delivery and timescale.

Paragraph 4.3.8 states that *"There is a significant risk that the operational capacity and safety of the J14 could become a limiting factor on realising the full potential of the Severn Edge proposals. This could be in terms of achieving safe and suitable access for construction and operational staff, as well as in terms of avoiding a residual cumulative severe impact, which could become a limiting factor in planning terms."*



However, no Strategic Business Case has been prepared.

Paragraphs 4.3.9 – 4.3.11 refer to wider connections e.g. to Hinkley Point C and Gravity Smart Campus and that strategic highway access between locations will be via the M5, however, once again there is no reference to funding/delivery etc. There can be no confidence that the wider issue of funding i.e. 85% shortfall beyond the contributions from sites in the local plan will be forthcoming, in which case this undermines the delivery and the effectiveness of the Plan.

#### **Section 4.4 The Case for National Highways**

Paragraph 4.4.1 states that *“Improvements to M5 J12 and J14 align with the requirements and aspirations of NH Route Strategies”*.

There is no evidence in the NH Route Strategies e.g. Route Strategy Initial Overview Report – Birmingham to Exeter – May 2023 National Highways. M5 Junction 14 is not in RIS2, nor is it identified as one of the pipeline schemes.

Paragraph 4.4.14 acknowledges this: *“Improvements at M5 J12 and J14 are not currently referenced within the Route Strategy as locations which would need to be improved in terms of areas of identified congestion and delay. However, SDC consider that there is a strong case for these schemes to be included in the Route Strategy on the basis of the strong alignment with Objective D as well as contributing to the desired outcomes of Objectives A, C and F. T”*

Paragraph 4.4.5 states that *“The proposed improvements to M5 J12 and J14 align with these objectives, and will help NH to face some of the challenges which are highlighted within the Route Strategy.”*

However, there is no programme, no certainty of delivery, no funding. Furthermore, there is added uncertainty over funding streams for road infrastructure projects resulting from the recent change in government

If as suggested in paragraph 4.4.8 the improvements to J12 and J14 are key to enabling economic growth in SDC and neighbouring authorities, both for housing and employment – then this raises the question why have these improvements not been factored into the RIS?

Improving a motorway junction does not support NH 's desired outcomes set out in paragraph 4.4.10 i.e. delivery of sustainable development to limit car -based travel and promote public transport use.

Paragraph 4.4.11 is premature in its conclusions that the schemes proposed will enable the delivery of housing and employment within Stroud District, in addition to benefiting growth planned regionally including within neighbouring authority areas. As mentioned above, although there are proposed increases in the standard method for housing need, it will be some years before this is delivered in the neighbouring local authorities local plans as all are behind SDC in local plan preparation.

*"The need for the improvements is exacerbated by the revised housing requirements being promoted by the Central Government to achieve the delivery of over 60,000 additional dwellings in the South West over the next five years, totalling c.200,000 new homes in five years."* Reference to the South West includes all local authorities from Cornwall to Gloucestershire in the SW Region. This figure cannot be used as justification for J14.

As referred to above the figures in Table 4.1 even for the neighbouring authorities to Stroud these figures cannot be relied upon and will not be delivered in the short term to support the delivery of the Stroud Local Plan.

Paragraph 4.4.12 *"Therefore, the improvements to J12 and J14 will help to deliver "sustainable development to limited car-based travel and promote public transport use" across the region"* object to this conclusion, not clear how major road infrastructure at J14 will support sustainable travel.

J14 is not in the RIS programme therefore it is premature to conclude that that improvements to J14 align with the Route Strategy Objectives

Paragraph 4.4.14 acknowledges that the improvements at M5 J12 and J14 are not currently referenced within the Route Strategy.

RIS4 pipeline 2030-2025 the scheme is not included –potential future schemes are originally identified by NH as part of RIS2 by DfT – these schemes are not currently committed for construction.

Whilst in **Section 5 Summary and Conclusions** there might well be argued *"...a case to be made regarding the delivery of improvements at M5 J12 and J14 owing to the wider benefits which are available based on the unlocking housing and economic growth within the region and alignment with NH objectives for the M5 corridor"*. There is no certainty in the process or funding and therefore no confidence in the delivery in the timescale to support sites in the SDC LPR.

If as stated in paragraph 5.1.10 the M5 junction improvements are "essential" for housing delivery in Stroud District, the same cannot be said for other local authorities in Gloucestershire and the West of England. There is no certainty in respect of neighbouring districts in their current local plans. Any increase in future housing needs as based on the proposed changes to the standard method is matter for local plan reviews and as the report acknowledges all the local plans are at earlier stages in preparation, therefore to assume that contributions will be made to J14 is no more than supposition and cannot be relied upon at this point in time (as has already been mentioned in respect of South Gloucestershire) . Furthermore, any increase in Stroud's housing needs over and above that proposed in the current Plan, will be addressed in a subsequent review of the Local Plan – Stroud's needs increase by an additional 224 per annum through the proposed changes to the Standard Method.

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

The technical evidence raises fundamental concerns about the soundness of the Plan as key issues in respect of the process for securing the delivery and timing of the major improvements to Junction 14 of the M5 within the plan period, so that proposed site allocations can be completed, have not been answered.

Without information on the timescale for the delivery of the scheme and how the remaining 85% shortfall in funding is going to be secured, this undermines the delivery and therefore effectiveness of the Plan. The only conclusion is that the Plan as currently proposed cannot be found sound.

### **Housing Delivery**

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

In respect of EB134 Housing Delivery we make the following comments:

- The trajectory indicates that approximately 15,164 dwellings could be delivered by the end of the plan period (2040) if all the assumptions held, against a requirement of about 12,600 dwellings, but this is reliant upon the new settlement at Sharpness delivering in year 29/30 and for Wisloe in year 26/27
- Despite the delay in the examination of the plan the housing trajectory for PS36 Sharpness is only delayed by one year from 28/29 to 29/30 and provides a higher figure for completions in 29/30 (155 dwellings) and still aims to be completed in the plan period, this is unsubstantiated given the evidence provided.
- Furthermore, the expected completions for Sharpness new settlement increase by 20 dpa from year 30/31
- Given the objections to both the new settlements and the long lead in times for large sites the Council should not rely on completion from these sites in the years indicated.

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

Please see above.

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

The housing trajectory scenarios highlight that the housing requirement of 12,600 homes over the plan period would not be achieved without a major upgrade to M5 J14, which National Highways has previously advised is currently operating over its capacity.

The Local Plan is reliant on the delivery of significant housing numbers at the new settlements of Sharpness (PS36) and Wisloe (PS37), both of which impact M5 J14. The Scenario which excludes those sites with an impact at M5 J12 & M5 J14 is shown to deliver just 7,932 (63% of the housing requirement).

EB135 states that the promoter for PS36 Sharpness has identified an interim scheme at M5 J14 which it considers can deliver 1,000 dwellings without adverse impact on J14. This seems to be inconsistent with the evidence in EB133a and EB133b which states in paragraph 2.2.5 that:

*"Further analysis has been undertaken by NH and GCC at J14 and J12 respectively which shows that there are limited realistic alternatives to delivery of major junction improvement schemes that can adequately accommodate future growth. Smaller scale and interim schemes have been considered, but are not sufficient to adequately meet the strategic needs of the region."*

The Council have put forward two Options:

- *"Option A: PS36 Sharpness new settlement delivers 1000 homes, all other sites with an impact on J14 do not come forwards*
- *Option B: Sites within the housing trajectory come forward up to the point that the equivalent level of traffic increase as 1000 homes at PS36 Sharpness new settlement is reached. This potentially delivers more homes than focussing delivery at PS36 Sharpness new settlement based on the number of trips per dwelling to J14 from other sites in the trajectory with an impact on J14." (my emphasis)*

Whilst Option B critically delivers more homes, but it also includes 375 dwellings at Sharpness in the plan period, contributing to a total of 9,330 dwellings. However, this raises the question about the infrastructure required for 375 dwellings at Sharpness. This option creates development in an unsustainable location which is not supported by public transport.

With the potential interim scheme for M5 J14, which the appendices to EB135 Appendix 1 has identified can accommodate an additional 134 vehicle trips in the AM peak hour (equivalent to 1,000 dwellings at Sharpness), the housing numbers increase to 9,330 (74% of housing requirement). This scenario assumes that the additional vehicles at M5 J14 is spread amongst all those Local Plan strategic sites that have an impact on M5 J14, and not solely focused at Sharpness (PS36) which would be inappropriate (the methodology has changed removing the 5% threshold, thus capturing more sites)

It is notable that the traffic impacts at M5 J14 from housing at Cam North West (PS24) are approx. 50% less than that of Sharpness (PS36); for example, for 1,000 dwellings at Cam North West (PS24) the equivalent number of dwellings at Sharpness (PS36) that have the same traffic impact at M5 J14 would be 500 dwellings.

To help with the delivery of housing it would be sensible for any interim scheme at M5 J14 to facilitate housing that will have a lesser impact at the junction, as this will allow more housing to be delivered before capacity is reached and a major improvement scheme is necessary.

If the allocation at Sharpness (PS36) was removed (given its reliance on M5 J14 and given the site's unsustainable transport credentials, as detailed in our representations at Q5) and replaced with a site or sites that access the M5 motorway at J13, the number of dwellings that could be delivered prior to the delivery of major improvement schemes at M5 J12 and M5 J14 would increase substantially, and would come close to achieving the identified Local Plan housing requirement.

With reference to EB135 Appendix 1, the worksheet 'J14 Impact Rates Calcs', as reproduced below, provides the traffic flows as output from the Stroud Local Plan traffic modelling, for the M5 J14 southbound on-slip in the AM peak hour for each of the Local Plan strategic sites identified as having an impact on M5 J14.

<b>J14 impact</b>	PS34	PS36	PS37	PS24	PS25
Dwellings	300	2400	1500	902	180
AM SB Onslip	40	322	134	60	16
trips per dwelling	0.133333	0.134167	0.089333	0.066519	0.088889
Impact equivalent of 1000 at sharpness		134.1667			

From the above table it is clear that those sites at Sharpness (PS34 & PS36) have the greatest impact at M5 J14 with a greater number of trips passing through the junction in the AM peak hour. In terms of trips per dwelling the site a NW Cam (PS24) can be seen to have approx. half the impact than the Sharpness sites. For example, traffic flows from 500 dwellings at Sharpness (PS36) is equivalent to traffic from 1,000 dwellings at NW Cam (PS24).

On the southbound on-slip Sharpness (PS36) is shown to have 322 trips with the completion of 2,400 dwellings; for 1,000 dwellings (pro-rata) the number of trips amount to 134. This is the figure used in calculating the housing trajectories with the inclusion of the M5 J14 Interim Improvement scheme, which the promoters of Sharpness consider can accommodate 1,000 dwellings at Sharpness, prior to the introduction of a major upgrade to M5 J14.

In reviewing the EB136 Appendices 1 & 2, which details Stantec's M5 J14 VISSIM modelling for testing the Interim Improvement scheme to accommodate 1,000 dwellings at Sharpness, the trip generation and distribution assumed for development at Sharpness has revealed significantly less traffic at M5 J14 than that shown in the Local Plan traffic modelling.

For the M4 J14 southbound on-slip in the AM peak the VISSIM modelling shows the Sharpness development trips based on a quantum of 1,000 dwellings to be just 62 vehicles (see below extract from pg. 22 of EB136 Appendix 2 TNO02 Trip Gen); this compares to the Local Plan modelling equivalent of 134 vehicles (over 50% less traffic). There is clearly an inconsistency in the two sets of modelling in terms of the traffic passing through M5 J14 from development at Sharpness (PS36).

## TECHNICAL NOTE



Table 6.2 – M5 Junction 14 Development Flows

	Morning Peak (8am to 9am)			Evening Peak (5pm to 6pm)		
	In	Out	Two-Way	In	Out	Two-Way
A38 S	17	31	48	26	19	45
M5 S	31	61	92	59	40	98
B4509 E	15	28	44	23	17	41
Total	63	121	184	107	76	183

If a similar approach were to be applied to development at NW Cam (PS24) you could expect to see reductions to traffic flows at M5 J14 to that shown in the Local Plan modelling for NW Cam. Applying the same % reduction, the number of vehicles on the southbound on-slip in the AM peak hour from NW Cam would reduce to just 27 vehicles. This level of traffic cannot be considered to be material requiring an improvement to M5 J14 (either interim or major upgrade); and would not warrant NW Cam (PS24) being included as a site reliant on an improvement to M5 J14, as suggested in the latest housing trajectories.

### **Scenario Unconstrained 2020-2042**

An objection is made to this scenario as it assumes that the housing requirement of 12,600 dwellings will be met in the plan period (2020-2040) i.e. by 15,337 dwellings in fact it will be exceeded by 122%. Our objection remains as per the submitted Plan, i.e. we objected to the proposal for a new settlement at Sharpness in PS36 for 2,400 dwellings by 2040. The further evidence that has been produced does not provide the necessary justification required to respond to the Inspectors fundamental concerns as set out in their letter of 4<sup>th</sup> August 2023. This is addressed in detail in response to EB136 below.

Irrespective of our concerns above the trajectory assumes that completions will start on site in 2029/30 with 155 dwellings, increasing to 220dw the following year and by 2035/35 to 248 dwellings per year.

The latest research from Lichfields (March 2024) "*sites of 1,000 + dwellings take on average five years to obtain detailed planning permission, then a further 1.3 – 1.6 years to deliver the first dwelling.*"

Even putting aside all the significant issues about the suitability of the site etc., the trajectory that the Council have included for Sharpness is unrealistically optimistic.

### **Scenario Unconstrained 2020-2040**

As above an objection is also made to this scenario, the only difference appears to be 173 dwellings less which is attributed to Wisloe new settlement -in the scenario above, 173 dwellings are completed post 2040. The housing requirement is 12,600 and 15,164 dwellings are anticipated to be completed in the plan period to 2040.

### **Scenario excludes sites with an impact on J12 2020 - 2042**

In this scenario without those sites that would impact on J12, the overall housing requirement is met and exceeded. The trajectory envisages 13,227 completions in the period to 2042. (The assumptions for the sites remain as in other scenarios except it excludes those sites that impact on J12). Whilst a higher figure than the housing requirement can be achieved this is dependent on the new settlements coming forward. Without the two new settlements or the sites that impact J12 only 9,327 dwellings can come forward.

### **Scenario excludes sites with an impact at J14 2020-2040**

In this scenario the trajectory envisages 10,042 dwellings to be completed in the plan period, this excludes all sites that the Council consider impact on J14.

An objection is made to this scenario as it also excludes PS24 Cam NW, yet in the notes to the trajectory this site is not excluded.

### **Scenario excludes sites with an impact at J12 and J14 2020-2040**

This scenario fails to deliver the housing requirement of 12,600 dwellings as only 10,042 are envisaged.

### **Scenario excludes sites with an impact at J12 and J14 2020-2040**

This scenario also fails to deliver the housing requirement of 12,600 dwellings as only 7,932 dwellings are envisaged.

### **Scenario assumes Sharpness interim scheme can be delivered up to 1000 units at Sharpness. All J12 impact sites are excluded. (Option A)**

This scenario also fails to deliver the housing requirement of 12,600 dwellings as only 8,967 dwellings are envisaged. This option is reliant upon 1,000 dwellings at Sharpness but all other sites e.g. PS24 Cam NW, J 12 sites and the Wisloe New settlement are excluded. Also, sites at PS28 Dursley, HAR017 Hardwick, BERO16/017 Berkeley, PS35 Wanswell and PS38 Kingswood are excluded.

### **Scenario assumes Sharpness Interim scheme can be delivered up to 1000 units at Sharpness. However, trajectory accounts for the equivalent impact on M5 J14 SB on-slip (AM) coming on a first come, first served basis from a range of sites. All J12 impact sites are excluded 2020 - 2040**

This scenario also fails to deliver the housing requirement of 12,600 dwellings as only 9,330 dwellings are envisaged. As referred to above this raises the question about the infrastructure required for 375 dwellings at Sharpness. option.

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

The housing trajectory scenarios highlight that the housing requirement of 12,600 homes over the plan period would not be achieved without a major upgrade to M5 J14, which National Highways has previously advised is currently operating over its capacity.

The Local Plan is reliant on the delivery of significant housing numbers at the new settlements of Sharpness (PS36) and Wisloe (PS37), both of which impact M5 J14. The Scenario which excludes those sites with an impact at M5 J12 & M5 J14 is shown to deliver just 7,932 (63% of the housing requirement).

The issue is whether an interim solution to Junction 14 is acceptable and deliverable, it should only be considered if it were to have a lesser impact at the junction, as this will allow more housing to be delivered before capacity is reached and a major improvement is necessary.

**PS36 Sharpness New settlement (Please read document EB136 & appendices 1-6)**

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

The following representations to EB136 and appendices are extensive for which we apologise. However, given the seriousness of the sustainability concerns surrounding the proposed Sharpness allocation and the volume of material that has been produced by the promoter, albeit informed by only limited engagement with key stakeholders and industry insight, it was considered that a detailed examination of the latest material was necessary. The additional material has again failed to address the fundamental locational shortcomings of the Sharpness site and it is considered that the Inspectors' fundamental concerns have also not been satisfactorily addressed. Furthermore, correspondence with Network Rail and Great Western Railway that is considered to be critically important has not been shared with the Inspectors. A copy of the correspondence has been attached to this response, which we trust will assist the Inspectors.

**EB136 Appendix 3 – Sharpness Branch Line SOC**

1. It is considered that there are issues of soundness in respect of the technical evidence provided to address the Inspectors' fundamental concerns as set out in their letter of 4th August 2023. At the time the Inspectors stated that "*whilst a significant amount of evidence has been submitted regarding the provision of a passenger train service and bespoke Mobility as a Service transport scheme (MaaS), we have serious concerns relating to the viability and deliverability of these schemes.*" (my emphasis). The Inspectors' letter goes on to state: "*Should both the train service and the MaaS scheme not be delivered as proposed within the Plan then what would remain would be a large new settlement where the use*



*of the private car for external journeys would likely become the default option for the majority of residents. This outcome would fundamentally conflict with the Plan's overall vision, its spatial strategy and the garden city ethos for new settlements." (my emphasis)*

2. With regard to rail, the Inspectors expressed concern that the cost of providing a passenger train service had not been audited or agreed with Network Rail or the relevant Train Operating Company (TOC). The Inspectors also expressed concern with the proposition by the promoter that the scheme would be self-funded by the development and the timing of subsidy coming to an end after 3 years.
3. Criterion 19 of Policy PS36 'Sharpness New Settlement' of the emerging Local Plan requires a *"New railway station and enhancements to the Sharpness branch line and contributions to support a regular passenger service to Gloucester"*. Stantec's Technical Note TNO01, dated 18 May 2023, responding to Gloucestershire County Council and SLC Rail refers to the Sharpness branch line as the backbone of the public transport strategy for Sharpness Vale.
4. In response to the Inspector's concerns relating to rail, Stantec has produced a Strategic Outline Case document (the SOC document). Stantec's SOC document states at paragraph 1.1.2 that the SOC stage is to confirm the strategic context and an early indication of a way forward. A 'preferred' option is not selected at this stage. The SOC therefore has no prospect of settling the Inspectors' concerns relating to the viability and deliverability of the rail scheme. In fact, the SOC document confirms at paragraph 1.1.3 that a step-back is required.
5. As part of the work to produce the SOC document, Stantec undertook Stakeholder engagement with Stroud District Council, Vale of Berkeley Rail Trust (heritage railway trust), Network Rail, Great Western Railway, Western Gateway and Gloucestershire Community Rail Partnership comprising a separate MS Teams call with each. The call with Network Rail took place on 20 May 2024 and the call with Great Western Railway took place the following day. There was no engagement with Gloucestershire County Council, the local transport authority, which has expressed significant concerns regarding the proposed Sharpness allocation and considers the Plan to be unsound on this basis as set out in its Statement of Common Ground with Stroud District Council. This is a surprisingly limited level of engagement. The SOC document indicates that Network Rail has a neutral view on the scheme and Great Western Railway has a positive view on the scheme. The notes from the call with Network Rail reveal that it was matter of fact in its responses with no indication of support. The notes from the call with Great Western Railway do not indicate any specific support for the rail proposal.
6. We are aware that Network Rail sent a letter to Gloucestershire County Council on 27 November 2023 that confirmed that it had met with Sharpness Developments LLP regarding bringing passenger train services to the Sharpness branch line in 2019 and 2020. There was one further meeting in August 2023 but no engagement between June 2020 and August 2023. The letter was a joint letter from both Network Rail and the Train Operating Company (TOC), Great Western Railway. The author of the letter was Daniel Round, the Industry Programme Director – West of England for Network Rail. **A copy of correspondence between the County Council and Network Rail/GWR including the key Network Rail/GWR letter of 27 November 2023 is attached to this response (Appendix 1).**

7. The Network Rail/GWR letter considers that the work to date was at the early feasibility stage, or in railway project development terms pre-PACE stage 1. The letter confirms that Sharpness Development LLP's demand appears to be unrealistically high given the journey options considered and proposed build out of the site and agrees with the conclusions of the SLR Rail report that GCC commissioned. Network Rail/GWR express concerns with the costs and funding model. In respect of Strategic Fit, the Network Rail/GWR letter confirms that "Our view is that the Sharpness proposal is unlikely to be compatible with the recommendations for future service development, specifically additional trains between Bristol and Gloucester. We would expect additional services between Bristol and Gloucester to be more beneficial than services between Sharpness and Gloucester." (my emphasis). The letter goes on to state that "Currently the proposal has the status of an unfunded aspiration that does not feature in industry strategic or investment plans." (my emphasis).
8. It is understood that a copy of the Network Rail/GWR letter, as attached, was provided to Stroud District Council but was not then sent onto the Inspectors nor was it uploaded onto the examination website. Furthermore, as far as we are aware, a copy of the letter has not been sent to the District Councillors and is not included as part of the information sent out in this latest consultation. This is extremely disappointing given the content of the letter, which specifically relates to the Inspectors' concerns expressed to Stroud District Council, which is duty bound to assist the Inspectors with their understanding of the Plan. Even more so as we learn that the SOC document itself has found that there is not a financial case for the rail proposal and indicates that the rail scheme should be considered in the wider strategic context within which there does not appear to be an appetite for a passenger service to/from Sharpness.
9. Clearly the promoter of the scheme has not undertaken the meaningful engagement with the key bodies within the rail industry that would be expected given the importance of rail to the Sharpness proposals and the concerns expressed by the County Council, its rail expert and the Inspectors themselves.
10. The SOC document sets out the Strategic Case at Chapter 2. At paragraphs 2.2.2 to 2.2.5, the document identifies the importance of a south facing chord to provide for journeys to Bristol, the regional capital of the South West. At paragraphs 2.2.7 to 2.2.9, the Strategic Case confirms that Sharpness is poorly served by bus and only one service goes to Bristol, which is "essentially the wrong way round for commuting" (my emphasis); that one service can only be accessed at Cam & Dursley so could not be accessed directly from the site in any event. Paragraphs 2.2.10 and 2.2.11 confirm that cycling to Cam & Dursley station would be an unattractive prospect. Paragraphs 2.2.10 to 2.2.17 confirm that car driver mode share is higher in Berkeley Vale than all other geographical divisions (namely Stroud District, Gloucestershire County, the South West region and England) and if people would have to drive to Cam & Dursley to get a train to Bristol, they would just drive the whole way. Contrary to all of the above, paragraph 2.2.18 states that there are opportunities to introduce new bus services, use existing infrastructure such as the Sharpness branch line [NB this only has a north facing chord, no station and would require upgrading to support passenger services] and develop safe active travel cycle routes and rights of way to encourage shift away from

private car and to cut multi-modal journey times between the site and key centres of Bristol and Gloucester.

11. In respect of the Strategic Case, the SOC document considers Travel Behaviour Outcomes and finds that *"it is clear that the lack of suitable alternative and sustainable modes to the car favours the private car with the expected outcome that the car is the dominant mode of transport in and around Sharpness and Berkeley"* (my emphasis). Societal Consequences are considered, and the SOC document finds that there is not much overall deprivation in the area. A policy review is undertaken; in respect of Transport Policy, the SOC document suggests the following four conclusions:
  - a. *"Fast intercity and/or long-distance regional services are planned on the Birmingham-Bristol corridor which may hinder additional services to serve Sharpness Vale.*
  - b. *The current infrastructure does not support additional stations on the Gloucester-Bristol stopping service.*
  - c. *A robust business case would be needed to support the reopening of the Sharpness branch line, and at this current moment of time, the case is not strong enough.*
  - d. *Joined up strategic planning with MetroWest, the reopening of Charfield and Stonehouse Bristol Road, and the requirements for infrastructure upgrades may make the case for the station and southern chord more viable, allowing Bristol to Gloucester stopping services to route via Sharpness Vale while faster trains overtake."*
12. Conclusion d. relates to 'Strategic Fit'. The Network Rail/GWR letter (see above) refers to two strategic studies relevant to this line of route – the Bristol to Birmingham Corridor Study (2021) and the Greater Bristol Strategic Study (2022). The letter states that *"Both studies were collaboratively undertaken with strategic transport planning authorities including the relevant subnational transport bodies and county councils. The Sharpness proposal was not raised by any party during either study, neither did it emerge as a recommendation from the evidence established."* (my emphasis) and concludes that the rail proposals are unlikely to provide a strategic fit given the aspirations for the mainline railway.
13. Five Transport Objectives are set for the SOC including: providing sustainable modes of travel for future residents; increase Modal Choice for those without access to car; increase strategic public transport connectivity; improve rail connectivity; and enable better access to opportunities and reduce levels of deprivation (cf above finding that there is not much overall deprivation in the area).
14. An Options Long-List has been drawn up as part of the SOC document. 21 'Sustainable Multimodal options' are in the list including active travel, public transport, Bus Rapid Transit and Demand Responsive Transport, Light Rapid Transit, Heavy Rail and Station Location/Relocation. The options are ranked in a table. The 'additional comments' column is enlightening in respect of bus public transport, bespoke coach and Demand Responsive Transport (DRT) with concerns expressed in respect of the practicality or effectiveness of these options.
15. The SOC document sets out the Economic Case for four different station options at Chapter 3. Paragraph 3.1.1 confirms that the assessment at this stage is to help

to decide whether or not to progress to Outline Business Case stage. So, the SOC document has confirmed that the project has not reached the Outline Business Case stage. The four options considered are:

**Option A:** A new station at Sharpness Vale on the existing Sharpness branch line, reopened to passenger services to Gloucester

**Option B:** A new station at Sharpness Vale on the existing Sharpness branch line, reopened to passenger services to both Gloucester and Bristol (the latter achieved by reinstating the southern chord near Berkeley Road)

**Option C:** A new station on the existing Birmingham–Bristol line at Berkeley Road, served by existing stopping services between Gloucester and Bristol

**Option D:** No intervention, with Sharpness Vale served by the existing Cam & Dursley and proposed Charfield station

16. The SOC document states that Options C and D would require shuttle bus services from the new development and surrounding area. It is not clear whether the cost of running these shuttle bus services has been included in the scheme costs or operating costs. This is the first time that Options B, C and D have been mentioned in the promotion of the Sharpness site.
17. Demand and revenue forecasting has been undertaken with a core assessment of one train per hour due to be operational in 2040, which is the end of the Local Plan period and therefore not early enough to be established as part of typical travel habits.
18. Option B, including the southern chord does not appear to include the cost of obtaining third party land, which could be substantial, if indeed possible at all given that the landowner/s may not wish to sell.
19. Scheme costs seem extremely light (cf my organisation's representations made at the Regulation 19 stage). For example, in respect of Option A, the SOC document considers the cost to be £7.7 million. The station alone would cost more than this. Soham Station in Cambridgeshire that opened in 2021, which is an unmanned single platform station, is reported to have cost £18.6 million. Notwithstanding this, at paragraph 3.4.12 the SOC document confirms that "The results across the options show that the revenue to be accrued over the 60-year appraisal period is not enough to offset the scheme costs and operating costs" (my emphasis). It goes on to state that "Only in the Do Nothing option are the revenues seen to marginally exceed and hence offset the scheme costs and operating costs". The SOC document goes on to confirm that "the rail options fall in the Poor Value for Money category" (my emphasis).
20. Chapter 4 of the SOC document considers the Financial Dimension. In respect of Cost Risk and Uncertainties, the SOC document finds that there are significant risk that costs could escalate sharply. It considers that there is a risk of no market interest to operate the service.
21. Chapter 5 considers the Commercial Dimension. It confirms that "Given the options still in-play at the conclusion of the SOC and their stage of development,

there is no single delivery model which can be definitively established at this stage" (my emphasis). A list of potential delivery partners is set out. The rail sector partners quoted are to be closed or potentially change when the current direct award franchises are terminated or absorbed into Great British Railways. There is no commitment from the Department for Transport nor Network Rail. Paragraph 5.4.9 states *"The service will only survive for as long as the train operator is able to cover their costs and generate a profit, so there is a risk that the service could cease. Consequently, a long-term commitment will be required from someone (developer/land owner/local authority) to accept that liability to ensure the longevity of the operation."* However, after considering the above options, the SOC document itself confirms that operating costs exceed predicted revenues for the key options.

22. The Management Dimension is set out in Chapter 6 of the SOC document. It sets out a programme for the delivery of a new station however the timeline is not complete. In any event, stage d. of the programme states that *"Further work will also be required around train services (timetable and resourcing) and operational issues at Gloucester and to provide information to support the inclusion of Sharpness station in the wider strategic development of the Bristol – Birmingham route corridor strategy including Midlands Rail Hub proposals. This is also an integral part of the initial option selection process."* Timescales for this have not been given.
23. A number of conclusions are drawn at Chapter 7. The conclusions of the SOC document confirm that operating costs exceed predicted revenues for the key options and these fall in the Poor Value for Money category. The conclusions suggest that the Berkeley Road option indicates a reasonable operating surplus, but this does not include construction costs for the new station that would be required and, as set out above, the revenue to be accrued over the 60-year appraisal period is not enough to offset the scheme costs and operating costs. The conclusions go on to suggest that *"integrating the Sharpness branch line into wider rail service patterns would remove the burden of the operating cost not falling solely on this particular scheme."* And *"if and when future aspirations for increasing services between Bristol and Gloucester come to fruition, and infrastructure required to facilitate such increase in services, then the option of reopening the branch line at Sharpness Vale with the additional demand generated should be included within these considerations"*.
24. Next Steps, as set out in Stantec's SOC document, indicate that the rail scheme for Sharpness should be considered within the "wider strategic context". The scheme would have to be taken on by the Department for Transport/Network Rail/Great British Railways. There is no evidence to suggest that there is any interest from these organisations to even consider taking the scheme on. In fact, the Network Rail/GWR letter dated 27 November 2023 confirms that there is unlikely to be a strategic fit. Stantec's SOC document does not mention Stroud District Council's failed "Restoring Your Railway Fund" bid to the Department for Transport which sought funds for a study into the re-opening of the Sharpness branch line to passenger services. In the meantime, the Restoring Your Railway Fund has been withdrawn, which indicates that the current government does not consider reopening rail branch lines and rural stations a priority for public finances.

25. As set out above, the Inspectors have expressed serious concerns relating to the viability and deliverability of the rail scheme. Fundamentally, the SOC document does not provide any confidence in the viability or deliverability of the rail scheme. In fact, the SOC document makes clear that there is not a financial case for the rail proposal and instead suggests that it be considered as part of the wider strategic context within which there does not appear to be an appetite for a passenger service to/from Sharpness as confirmed by the National Rail/GWR letter to Gloucestershire County Council of 27 November 2023.

#### **EB136 Appendix 4 – Updated Research on Mobility-as-a-Service**

26. With regard to Mobility as a Service (MaaS), in their letter of 4 August 2023, the Inspectors expressed concerns *“regarding its likely cost, how it would be funded and whether it would be viable. In addition, we are still not clear how a scheme like this has been successfully implemented in the context of a new settlement rather than an urban area where existing public transport options already exist and are well-established”*.
27. Criterion 21 of Policy PS36 ‘Sharpness New Settlement’ of the emerging Local Plan requires *“Measures to reduce car ownership, as well as car usage, including Mobility-as-a-Service (MaaS) systems to provide occasional access to vehicles, bike hire schemes and public transport vouchers/incentives”*.
28. Paragraph 1.7 of Stantec’s Updated Research on Mobility-as-a-Service document (Stantec’s MaaS document) states *“It is important to note that the development of Sharpness Vale is by no means contingent on the provision of a MaaS solution as all proposed transport systems will be implemented regardless” (my emphasis)*. This is contrary to emerging Policy PS36 and, as set out above and below, there is not a financial case for the public transport proposals.
29. Paragraphs 2.2 and 2.3 of Chapter 2 ‘Government Strategy Updates’ of Stantec’s MaaS document refer to the Department for Transport’s document ‘Future of Transport Helping local authorities to unlock the benefits of technology & innovation in rural transport’ and lists nine rural principles; one of which is: *“Affordable and accessible public transport and shared mobility must be fundamental to an efficient rural transport system”*. Paragraph 2.4 of Stantec’s MaaS document acknowledges the “rural context” of Sharpness Vale and goes on to state that *“it must be ensured that the implementation of MaaS aligns with the Principles of Rural Mobility so that it is executed efficiently and has support from Government and all relevant stakeholders”*. Without public transport, the Principles of Rural Mobility cannot be met.
30. Chapter 3 of Stantec’s MaaS document introduces one additional case study. That is the “Go-Hi” app that allows you to find, book and pay for all your travel in and around the Highlands and Islands of Scotland in one place. This is a vast geographic area with an existing population of around 450,000 people (Scotland Census 2022). Participants include buses, trains, ferries, taxis, car clubs, car rental, bike hire, flights, demand responsive transport (DRT) and hotels. The population and multiple modes of transport, to which the app provides an improved route to market, were already embedded. This is unlike Sharpness new settlement where the population nor transport options exist. Stantec’s MaaS document points to

downloads as a measure of success with more than 3,000 downloads quoted for Go-Hi. Downloads do not equal use or mode shift, but it does give an indication of interest. Based on the figures quoted by Stantec, downloads per population is less than 1%. This would be a vanishingly small level of interest, let alone regular use, when scaled down to Sharpness.

31. Chapter 4 refers to the use of Demand Responsive Transport (DRT) by Worcestershire County Council via the Via app. This is not MaaS. It is a booking and despatch system for DRT.
32. Chapter 5 refers to the Reallabor Schorndorf Project, Germany. There is very limited detail about the project in Stantec's MaaS document and measures of success that are listed do not include any tangible indicators of impact or viability.
33. Chapter 6 'Maas Business Models' of Stantec's MaaS document states that there is continuous emerging information about the way MaaS apps can be implemented however, there is limited information available on the detailed cost breakdown associated with their implementation. Stantec refer to Trafi, a MaaS platform developer, as an exemplar of a successful MaaS business model for Sharpness.
34. Trafi is the developer of the MaaS app covering the Solent area. The MaaS app covering Solent is known as 'Breeze'. This app covers south Hampshire, Southampton, Portsmouth, and the Isle of Wight and aims to test innovations that enable seamless, car-free, and accessible journeys for all residents. PFA Consulting has been in communication with Go South Coast Ltd, the commercial bus operator providing the vast majority of bus services on the Isle of Wight also in the greater Southampton area and New Forest, who is participant in Breeze. **Go South Coast wrote to PFA Consulting on 7 October 2024; the letter is attached to this response (Appendix 2)**. As a commercial bus operator, operating bus services on both the mainland in Southampton and New Forest, as Bluestar, and on the Isle of Wight, through its Southern Vectis business, Go South Coast is able to comment on market impact and relevance of MaaS in both an urban and rural context. It confirms *"Overall, thus far we do not see evidence that the Breeze App, technically impressive though it seems to be, has garnered any real market impact or acceptance"* and goes on to comment *"The clear bias towards trips within the Southampton urban area, with very little apparent use on the Isle of Wight, suggests a wide range of additional factors militate against the perceived utility and relevance of the MaaS offer in a more rural compared with an urban context and demographic mix."*. In respect of impact, Go South Coast states *"There is no evidence at all that the deployment of any of the MaaS and multi-modal platforms in the wider Solent area has secured mode shift from car use."*
35. Chapter 7 'Implementing a MaaS Platform' sets out steps to implement a MaaS platform. This does not provide any detail of timescales or cost but does show that stakeholder engagement is necessary. In the event that stakeholders do not want to be participant, the technology is irrelevant.
36. Chapter 8 'Implementation of MaaS in Sharpness' considers who might use the app. This includes rail and coach. Paragraph 8.1 states that the Sharpness Vale development will be used for identifying and costing a functional MaaS platform as

it progresses. The Inspectors' concerns regarding cost, funding and viability can therefore not be allayed.

37. Chapter 9 'Coverage' demonstrates just how small the extent of the scheme would be, which, even though it includes both Phase 1 (2,400 dwellings) and Phase 2 (2,600 dwellings), is in stark contrast with the examples given by Stantec.

38. In conclusion, Stantec's MaaS document considers that the Inspectors' concerns have been addressed. However, the document does not provide the detail in respect of cost, funding and viability that the Inspectors would need to have confidence that MaaS could be effectively deployed at Sharpness. The conclusions of the MaaS document acknowledge that it is working at a high-level and considers engagement with a MaaS app developer is needed. It states, "*The key stakeholder, scope of service and coverage for a MaaS service for Sharpness has been identified*". However, stakeholder engagement does not appear to have been undertaken and so the level of interest in participation is not known. Without the participation of relevant multi-modal transport operators that can compete with the private car, MaaS would be irrelevant. The relatively remote location of the site, some significant distance from the main movement corridors, as defined by the District Council's STS, mainstream bus routes as shown on Stagecoach West's Consolidated Public Transport Plan (See Stagecoach West's Public Transport Measures Map, spreadsheets and covering letters dated 26 April 2023 – Reference: SLP-AP-001 / REP-952-001 to 004) and major centres of employment, make the location unattractive to transport providers, as demonstrated by the lack of public transport operating in the area. Furthermore, no evidence has been provided to demonstrate that a MaaS scheme has been successfully implemented in the context of a new settlement rather than an urban area where existing public transport options already exist and are well-established. It is therefore considered that the Inspectors' concerns have not been satisfactorily addressed, nor can they be given the lack of opportunities for sustainable travel and the locational disadvantages of Sharpness for significant development. MaaS trials are underway, but the commercial viability is as yet unproven, as is the impact on personal car ownership and use.

#### **EB136 Appendix 5 - Update to Sharpness Vale DRT- Coach Services**

39. Criterion 17 of Policy PS36 'Sharpness New Settlement' states:

**"Direct and attractive express coach/bus services to key destinations, including Bristol and Gloucester, delivered at an early stage and designed to be more attractive than the use of private car for comparable trips"**

40. Stantec's Update to Sharpness Vale DRT- Coach Services (Stantec's DRT – Coach Services document) confuses scheduled express coaches with Demand Responsive Transport (DRT).

41. DRT is a flexible service that provides shared transport to users who specify their desired location and time of pick-up and drop-off. DRT can complement fixed



route public transport services and improve mobility in low-density areas and at low-demand times of day. There are no regular fixed route public transport services anywhere near Sharpness because of its relatively remote location as identified in the Council's Sustainable Transport Strategy and Infrastructure Delivery Plan.

42. Scheduled express coach services would typically be timetabled and operate on fixed routes with scheduled stops. These could evolve, but the proposal is particularly problematic being a single point of origin in a relatively remote location from which residents would have a vast range of employment locations with varied working patterns. The travel distances would result in greater costs in respect of fuel, vehicle servicing/replacement, driver salary and will likely result in significant downtime for vehicle/driver. The commercial case to provide a relevant bus or coach-based public transport service from Sharpness is therefore very questionable; both GCC and Stagecoach in their representations to the Local Plan have expressed concerns about the promoter's overly ambitious bus journey times and estimated modal share values which they consider are not reflective of typical transport demand in Gloucestershire. Stagecoach has pointed out in representations that the bespoke transport proposals are focused on, and reliant upon demand from the development itself, the costs would be exceptionally elevated by the distances involved concluding that the economics are utterly compromised. Stagecoach refutes the contention that meaningfully attractive and effective local bus services can ever be delivered within realistic resources and costs to this location [Sharpness].
43. There is no new evidence provided by Stantec's DRT – Coach Services document. It simply confirms that it considers that the issues with M5 Junction 14 and the rail proposal will have implications for road based public transport and require refinement to the operational characteristics as well as the costing of the coach services. It concludes that a meeting is to be held with Via, the provider of DRT services in Worcestershire, where information will be provided to enable Via to provide an assessment of a service. There is therefore no demonstrable commercial case for public transport services to/from Sharpness.

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

- The Inspectors have expressed serious concerns regarding the viability and deliverability of the rail scheme.
- EB136 Appendix 3 makes clear that there is not a financial case for the rail proposal and instead suggests that it be considered as part of the wider strategic context. There is no appetite for a passenger service to/from Sharpness as confirmed by the National Rail/GWR letter to Gloucestershire County Council of 27 November 2023, which stated that the proposal has the status of an unfunded aspiration that does

not feature in industry strategic or investment plans. It is disappointing to learn that despite having this letter SDC did not consider it necessary to pass it on to the Inspectors nor Members nor include it in this consultation, as its importance to the issues at hand is fundamental.

- The Inspectors have expressed concerns relating to the likely cost, funding and viability of the Mobility as a Service (MaaS) offer.
- EB136 Appendix 4 does not provide the detail in respect of cost, funding and viability that the Inspectors would need to have confidence that MaaS could be effectively deployed at Sharpness.
- The relatively remote location of the site, some significant distance from the main movement corridors and major centres of employment, make the location unattractive to transport providers, as demonstrated by the lack of public transport operating in the area.
- Without the participation of relevant multi-modal transport operators that can compete with the private car, MaaS would be irrelevant and would not lead to a mode shift from car use.
- Both GCC and Stagecoach in their representations to the Local Plan have expressed concerns about the promoter's public transport proposals, which have not been addressed by EB136 Appendix 5.

**PS37 Wisloe New settlement (Please read document EB137)**

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

No comment

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

No comment.

## **APPENDIX 1: NR LETTER RE SHARPNESS 27.11.2023**

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Emerging Draft Stroud District Local Plan - Proposed Sharpness Allocation - Rail Evidence  
**Date:** 05 October 2023 17:06:21  
**Attachments:** [Sharpness Rail letter NR- GWR.pdf](#)

---

Dear [REDACTED]

Please find attached a letter requesting your respective organisation's views on the viability and deliverability of rail evidence submitted in support of the proposed Sharpness allocation in the draft Stroud District Local Plan by the site promoters.

I have asked the Programme Officer for a link to the documents from the Examination website as they are very large. You may already have access to them, if not, I'll find a way of sending them over.

If you have any questions or would like to discuss this matter, please do not hesitate to contact me.

Yours sincerely

[REDACTED]  
Senior Planning Officer  
[REDACTED]



To: [REDACTED] - Industry Programme  
Director West of England - Network  
Rail

Economy, Environment and Infrastructure  
Shire Hall  
Westgate Street  
Gloucester, GL1 2TG

[REDACTED] - Commercial  
Development Director – GWR

email: [REDACTED]  
phone: [REDACTED]

Sent by email

**Our Ref:** NR/GWR/RN

**Your Ref:**

**Date:** 6<sup>th</sup> October 2023

Dear [REDACTED]

### **Draft Stroud District Local Plan – Sharpness allocation and rail link**

The purpose of this letter is to update you on progress regarding the draft Stroud District Local Plan (the Plan) and seek your opinion on rail evidence provided to support the strategic allocation at Sharpness.

As you may be aware the emerging draft Plan has been subject to a public examination over the past few months. Recently the Planning Inspectors wrote to Stroud District Council (SDC) setting out serious concerns regarding the Plan and recommending its withdrawal. These are based around the lack of credible transport evidence to support the Plan's development strategy and in particular the proposed strategic mixed-use allocation at Sharpness of 2400 dwellings up to 2040 and a total of 5000 dwellings by 2050.

As part of the sustainable transport justification for the location, the site promoters are placing considerable emphasis on the north facing rail freight link as a means of promoting the sustainability of the site. It is proposed to upgrade the line for regular passenger services to Gloucester.

Gloucestershire County Council (GCC) officers have objected to the Plan including the Sharpness allocation. Our key concerns align with those of the Planning Inspectors. We consider that the proposed public transport interventions are undeliverable and unviable and if the development proceeded it would result in severe congestion on the local and strategic road networks.

With regard to the rail evidence submitted to the public examination, GCC officers have raised significant concerns over the assumptions made regarding the viability, costs and deliverability of the rail component of the proposed allocation. Which in turn undermines the sustainability of the site as the default position for residents will be the private motor car.

It would be helpful if you could review the evidence provided by the promoters of Sharpness and give an assessment of the viability of their evidence and whether it's realistic and how it relates to the 'strategic fit' of your respective organisations. We welcome your views on the following aspects:

- Infrastructure costs
- Running costs
- Patronage and Mode Share
- Timetabling (fitting in with the Mainline services)
- Strategic fit
- Maintenance/Stabling

In response to the letter received from the Planning Inspectors SDC have requested a six month 'pause' and have drawn up an action plan setting out a programme of work aimed at addressing the Inspectors' concerns. Your organisations have probably already been contacted by the Sharpness promoters about this. It can be viewed at:

<https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review/local-plan-examination/examination-library>

As you see there are several actions relating to your respective organisations – are these realistic and achievable in the timescales set out?

I look forward to receiving your comments in due course and if you require any additional information, please do not hesitate to contact me.

Yours sincerely



Senior Planning Officer

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Emerging Draft Stroud District Local Plan - Proposed Sharpness Allocation - Rail Evidence  
**Date:** 27 November 2023 15:12:39  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[Joint Sharpness GCC response NR and GWR 231127.pdf](#)  
**Importance:** High

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OFFICIAL

Dear [REDACTED]

Many thanks for your letter dated 6 October regarding the above. Apologies for the delay in responding to you.

I have agreed with Tom Pierpoint that the attached is a joint response from both GWR and Network Rail.

I trust that the response provides you with the answers to the questions that you posed us but please feel free to get in touch if you have any further queries or clarifications required.

Kind regards,



[REDACTED]  
**Industry Programme Director – West of England**  
**M: 07734 648112**



[Investing in rail](#)

Investment Directorate  
Wales & Western Region  
Western House  
1 Holbrook Way  
Swindon  
SN1 1BD

██████████  
Senior Planning Officer  
Economy, Environment and Infrastructure  
Shire Hall  
Westgate Street  
Gloucester  
GL1 2TG

27<sup>th</sup> November 2023

Dear ██████,

**Re: Draft Stroud District Local Plan – Sharpness allocation and rail link**

Thank you for your letter of 6<sup>th</sup> October to myself and ██████████ at GWR. Apologies for the delay in responding but please take this as a joint response from both organisations.

We at Network Rail have had only limited involvement with the proposed Sharpness allocation and rail link. Our colleagues at GWR have had no involvement to date. The response below summarises our view from that engagement.

As you know part of our role involves working with parties who wish to develop the rail network. This includes central and local government, industry bodies, and third parties including property developers.

**Engagement on Sharpness Vale**

We had a series of meetings with Sharpness Development LLP regarding bringing passenger train services to the Sharpness branch line in 2019 and 2020. We had one further meeting in August 2023. Between June 2020 and August 2023 we had no engagement.

In 2019/20 we supported the promoter in undertaking a capacity assessment to establish in what scenarios trains between Sharpness and Gloucester could ‘fit’ on the railway (i.e. between other services). Alongside this output we highlighted the critical need to establish the strategic case for the scheme, including support from transport planning authorities and potential train operators.

We have not undertaken any work on the requirements for bringing the existing freight branch into passenger use. Nor have we undertaken any formal review of the work provided by the promoter. These activities would require expert resource and funding.

We understand that Sharpness Development LLP has commissioned studies on both infrastructure and operational requirements. We have not assured these and therefore cannot comment on the detail of their conclusions. However, in terms of maturity we would consider them as at the early feasibility stage, or in railway project development terms pre-PACE stage 1.

Similarly, we have only informally reviewed the demand evidence provided by Sharpness Development LLP. We have asked for more information around demand, specific journey flow, and pricing assumptions.



To date this information has not been provided to us. However, we have explained to Sharpness Development LLP our concern that the demand appears unrealistically high given the journey options considered, and the proposed build out of the site. In this respect we agree with the conclusions of the SLC report you commissioned.

### **Funding and finance**

We have concerns, which we have raised with Sharpness Development LLP, around the lack of detail on the proposed funding model. We have explained the need to understand the proposed financial model including use of public funding, financing and return. We think it likely the proposal will require public capital funding and / or operational funding. No potential mechanism for understanding the funding model has been set out to us.

Applying a simple benchmarking approach, the capital cost proposed by Sharpness Development LLP looks very low, and does not appear to include an appropriate risk allowance to reflect the lack of development undertaken to date. Therefore, we would expect the capital cost requirement to be higher than stated.

It appears that the option put forward in the *Sharpness Vale transport response* assumes a Very Light Rail (VLR) operation. We don't believe a VLR style service is viable. Most of the proposed journey between Sharpness and Gloucester would be along on the main line, alongside high-speed passenger and freight traffic. There is no precedent for such trains running on main lines and currently no operator or manufacturer holds a safety case for this kind of operation. Therefore, we consider that a heavy rail service (and the costs associated) should be assumed.

As well as a review of capital costs, an assessment of ongoing funding requirements would be required, which would need to factor train costs (leasing, insurance), ongoing operational costs (maintenance, fuel, staff) as well as the set-up costs needed to establish the operation (recruitment, training) and the support required to run stations.

Alongside questions about demand, the assumptions on pricing are not clear. If revenue does not exceed operational costs in the timeframe predicted subsidy will be required. Again, potential mechanisms need to be set out for this, which will require a funder which can accept ongoing operational cost exposure. If any public funding is required then we would expect to see the scheme progress through the Government's Project Business Case framework following the five case model. The first stage would be the Strategic Outline Business Case (SOBC).

We have recent experience supporting promoters of similar proposals through the national Restoring your Railway programme. The Ideas Fund of that programme saw each promoter produce a SOBC for their scheme, with our guidance. We are aware that an application for development support was submitted to the Ideas Fund. However, the scheme was not selected for funding. Whilst this does not prevent interested parties pursuing a business case, it does mean that development work would need to be initiated and funded by a third party (i.e. non railway or government sources) in order to progress. Whilst Sharpness Development LLP have not set out to produce a business case our feeling is that this work would be needed in order to progress and that the work shared to date is not of sufficient maturity or comprehensiveness for an SOBC.

### **Strategic fit**

In recent years we have published two strategic studies relevant to this line of route – the Bristol to Birmingham Corridor Study (2021) and the Greater Bristol Strategic Study (2022). Both studies were collaboratively undertaken with strategic transport planning authorities including the relevant sub-national transport bodies and county councils. The Sharpness proposal was not raised by any party during either study, neither did it emerge as a recommendation from the evidence established.

Both studies recommend the provision of additional passenger train services on the main line between

Bristol and Gloucester. Whilst these recommendations are unfunded and cannot preclude the development of other improvements, they represent established industry strategy for this part of the railway.

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

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

On the question of the action plan proposed by Stroud District Council we have had no contact on this and therefore can't comment on its inclusions except to note that given the above we are not planning any work in support of the action plan.

Yours sincerely,

[Redacted signature]

[Redacted name]

**Industry Programme Director - West of England**

Copy to:

[Redacted] Great Western Railway  
[Redacted] Network Rail

**APPENDIX 2 : SOLENT MaaS LETTER TO PFA 07.10.2024**

Towngate House  
2-8 Parkstone Road  
Poole  
BH15 2PR

October 7th 2024

██████████  
Director  
PFA Consulting  
Stratton Park House  
Wanborough Road  
SWINDON  
SN3 4HG

Dear ██████████

## **Solent Area MaaS offer and uptake**

I refer to the email correspondence to me of Thursday 3<sup>rd</sup> October, following a previous conversation about this a matter. From this discussion, I am aware that elsewhere within the UK, Mobility-as-a-Service (MaaS) in the wider are either side of the Solent is being held up as demonstrating that:

- MaaS is broadly deployable and effective
- MaaS can be successful in substituting for a significant number of previously car-borne journeys
- MaaS can achieve significant mobility market profile and penetration in a variety of contexts.

In the regard you asked some specific questions which I will answer in turn.

However it is worth briefly touching on some background and the history of multi-modal ticketing systems in our extensive operating area spanning both the South Hampshire and South East Dorset urban areas and on the Isle of White, on both sides of the Solent.

Go South Coast Ltd. is the commercial bus operator providing the vast majority of bus services on the Isle of Wight, through our Southern Vectis business; but also in the greater Southampton area and New Forest, as Bluestar. On the mainland east of the Hamble the main operators are Firstbus and Stagecoach South. There are a number of cross-Solent ferry operators, all operating commercially, as broadly do we. This includes Red Funnel, Wightlink, and Hovertravel. The ferry offer is differentiated by the ports used, and the type of vessel, including passenger-only high-speed catmarans, and hovercraft, as well as vessels that can carry vehicles. It is the fast passenger-only vessels that tend to account for the majority of regular daily cross-Solent trips. Given the scope of our operations and the fact that most corss-Solent commuting originates on the Island (see Census 2021 Journey to Work

data for example) we have a particular interest in offering the best value and greatest convenience to these travellers.

We have therefore had a long history in providing seamless ticketing offers including mainland travel and the sea crossing. This includes a Southern Vectis bus "add-on" to a National Express tickets also including a ferry crossing to the Island; and did include the "HoverRover" sold through Hovertravel and giving freedom of our Southern Vectis services on the Island, as well as buses on the mainland operated by Stagecoach. The latter has been withdrawn from sale by Hovertravel. These have not been digitally-enabled however, and have generally been sold through the coach or ferry operator's channels alone. Nor do these sit with a comprehensive multi-modal travel information and planning offer, and thus cannot be considered MaaS.

There has been a "SolentGo" multi-modal product offered in South Hampshire since 2016, which has a separate information and payment platform, and was considered a pioneering MaaS offer. As well as the main bus operators in Southampton, it included the Gosport-Portsmouth Ferry and the Hythe Southampton ferry, but has never included micro-mobility since that was introduced in Portsmouth and Southampton. The Hythe ferry has ceased operation and the Gosport ferry has withdrawn from this scheme, thus in effect SolentGo is now only a multi-operator bus ticket. The challenge achieving comprehensive multi-modal operator participation are clear from this experience.

Where the evidence of the impact of MaaS is concerned, as you are seeking, the more relevant focus is the "Breeze" MaaS platform. This is much more recent than the SolentGo app having been in place as a platform since February 2022. However, it has only been publicised since January 2024. **As such it cannot be considered fully established in the market for a full year.** Its scope is different from SolentGo being addressed also at the Isle of Wight and cross-Solent daily travel market, as well as a quite broad "mainland" geography covering most of heavily-urbanised South Hampshire.

Breeze is a multimodal and fully integrated journey planning app and currently serves a population of around 1.3 million. It offers seamless (find, plan, book, and pay) trip options in one single app. It includes all the main bus operators both sides of the Solent including ourselves, the Voi e-scooter schemes in Southampton and Portsmouth, the railway, and Enterprise car clubs; but only two of the three main ferry operators - Red Funnel is not participant. Further information is available at

[https://www.trafi.com/files/ugd/53accc\\_a566cbf1bcbd49ea8307d48a4c01a85f.pdf](https://www.trafi.com/files/ugd/53accc_a566cbf1bcbd49ea8307d48a4c01a85f.pdf)

It is notable that from initiation of the delivery contract with Trafi in 2020 it took until early 2024 to have the product sufficiently mature and functional that it could be publicised. We understand that there have been over 30,000 downloads of the App so far. This is evidently about 2.3% of the population in the area covered by the App MaaS offer.

Turning to the questions you raised:

***Is a discount applicable*** against the usual bus-only tariffs for bus travel as part of a multi-modal "bundle".

**No. This has never been the case.** The value of the App offer on Breeze is the added convenience of single point journey planning and payment. We should stress that we are only offering a limited range of network day, 12-trip "carnets" and weekly tariffs via the App: two Southern Vectis and four Bluestar. These are the products that account for the most of our sales and are also the most relevant to our regular travellers, including part-time workers and more occasional users including the regular cross-Solent traveller without a car.

*The principal aim of the MaaS product was to make cross Solent multi-modal journeys more convenient and more affordable. **Were the principal cross-Solent ferry operators Wightlink, Red Funnel and Hovertravel ever part of the SolentGo MaaS platform? If so, was a discount applicable when buying bus and ferry travel together? How great was this discount?***

**We would stress that both SolentGo and Breeze were actually conceived with a broader applicability, to a much wider range of multi-modal trips in the area covered.**

As explained above, SolentGo was a "mainland-only" offer. The cross-Solent operators were never involved, nor was our Southern Vectis bus operation on the Island.

The Cross-Solent **Breeze App does include ferries and both Wightlink and Hovertravel as participants.** Of these, all Hovertravel services offer a "fast crossing" product with a traject time of about 10 minutes between Southsea and Ryde, with a terminal close to frequent bus services on the Island side, and a connecting bus taking a few minutes linking the Soutsea terminal to the main bus interchange in Portsmouth. The Wightlink "fastcat" offer runs to Ryde Pier Head which is a half-mile walking distance from bus connections at Ryde Esplanade, though at the Portsmouth end the terminal is adjacent to the railway station and the man bus terminal at The Hard. This being the case, it is the Hovertravel link that is perhaps the more relevant for bus integration on the Island, and this is **one route out of a total of six** discrete cross-Solent trajects available between all three ferry operators.

**It is regrettable that the popular Red Funnel "fastcat" service from East Cowes to Southampton is not and has never been available on the Breeze App.** The most direct route between Newport, the largest town on the Island, and Southanpton, is using this service, with frequent bus connections at both ends.

**There has never been a discount buying ferry and bus together,** as noted above.

*Excluding contracted shoreside bus shuttle operations for the ferry companies, **do bilateral arrangements exist outside the "Breeze" offer for the public allowing through travel on a single ticket and tariff between bus and ferry, and vice versa?***

**Yes.** As explained above **certain multi-modal through tickets have long been available.**

We have about 200 annual uses of multi-modal tickets sold by National Express: a fairly nugatory number, espically as one ticket may account for multiple bus boardings.

The "HoverRover" ticket is sold through Hovertravel. It is a combination of a return hovercraft trip and a Southern Vectis Island "Dayrover". It is aimed at tourist day-trips originating on the mainland. We see about 1,300 annual uses, which, given it is a day rover ticket and each would be used at least twice in a day, suggests that on average fewer than 2 a day is sold.

Both these are somewhat the opposite of Breeze that where the cross-Solent market is concerned, is targeted at regular business commuting and visitor trips from the Island to the mainland. However the Breeze App encompasses a great deal more potential in the way of inter-modality on the mainland - for example rail-bus and rail-micro-mobility, in and around Portsmouth, Fareham and Southampton in particular.

***What is the volume of annual sales been in the last year via the "Breeze" platform? How does this compare with typical monthly passenger boardings on Southern Vectis services that serve the principal ferry terminals. While this includes all your core services, it would be most appropriate to focus on services 1, 4 and 5 in particular, which offer the principal links from the principal ferry terminals to/from the main Island population centres, excluding those otherwise served by the Ryde Pier Head-Sandown "Island Line" railway?***

While the Breeze App has existed since February 2022, prior to it being properly publicised in January 2024, use was almost NIL. We have thus yet to see a full year of patronage evolve.

What is already indisputable is that uptake on our services across a broad area rapidly rose within two months of public launch to a level of **about 190 boardings per day**, of which just under 120 boardings per day related to the Southampton MaaS day ticket tariff. There is a very clear drop off at Easter and equally during the School summer holiday period, where it dropped to about 100 per day for the Southampton day-ticket based on a 28-day moving average. This demonstrates that the bulk of use is by regular commuters in the Southampton area and much may be related to College and even Higher-education related trips, both staff and students. There is extremely limited use of the MaaS platform for bus journeys on the **Isle of Wight: almost none to speak of.**

This suggests, quite strongly, that **it is unlikely that there are many more than about 60 regular bus passengers on our entire network** who use the platform for any journey purpose - including but far from restricted to cross-Solent travel. We cannot speak for other participants, including the other bus operators, First and Stagecoach. The statistic clearly reflects boardings on the mainland - mainly in Southampton and Eastleigh - using our Bluestar services perhaps as part of a trip involving rail, or, less likely, e-scooters; that need not have used the ferry at all. **Indeed these urban trips, either first- or last-mile, apparently are the majority.** We see no reason to believe that uptake elsewhere in the area covered by Breeze will not be very similar - elsewhere, no doubt trips with connections within the Portsmouth City area would see the highest use, and connections between the Gosport and Fareham Busway and the railway at Fareham. Gosport is one of the largest towns in the UK not directly served by rail.

**The very rapid uptake, and subsequent plateau, strongly indicates these were already travellers making the same journey the same way**, and have availed themselves of the simplicity of a single payment using the App, rather than the journey planning function being the entry to use of the Breeze

platform. There is no “bundling” of tariffs on the App where bus is concerned, thus no discount against buying the equivalent tariff directly from us.

Over the few weeks since the start of September, there is some evidence that usage has slightly declined to between of which 100 and 110 boardings per day area within the Southampton City network that accounts for the bulk of our Breeze customer base.

The Isle of Wight saw nearly 50 annual bus passenger journeys per head of population in 2022-23, higher than Portsmouth and Milton Keynes, and over 65% higher than the average for the South East outside London, bus use and mode share is relatively high - exceptionally so for a largely rural context. **With a total of fewer than 12 boardings per day on the whole Island network, usage and penetration of the App is obviously minuscule.** Compared to the total boardings on the Island, on the main services connecting with ferries, these are clearly disappointingly small numbers. Services 1, 4 and 5, on a typical weekday account for about 6,200 boardings each day. This is far from the whole Island network and doesn't include services 2,3 serve Ryde, and the Hovertravel terminal area in particular. The numbers using our service 1 to reach the Red Funnel fastcat service to Southampton - not available on Breeze - will alone be a substantial multiple of this number.

A more meaningful measure of the success of Breeze would be use in Southampton City, which at 73.3 bus boardings/annum/head in the same year is one of the five most intensely used bus networks in Britain. Our daily weekday boardings in the main city network well exceeds 50,000. **Thus, 100+ daily MaaS boardings, and probably user numbers at less than half of that in a dense urban context represents a tiny fraction of the market.**

This means that relevance of bus within the MaaS offer, for bus in general, especially for off-Island trips, involving ferry travel, ought to be quite high. **The minimal use on the Island to facilitate inter-modal trips - generally fewer than 5 users per day - is very notable.**

The fact that uptake is limited, static, and hugely focused on local journeys within Southampton City as far as we can tell (we do not know the use on the railway) is clearly disappointing.

*Have there been **any particular commercial or technical challenges** establishing and participating in the Breeze scheme?*

**Yes.** There have been some quite significant technical issues and a large expenditure of time in establishing participation in Breeze, on our part. At least £2.4m in public money has been used to procure the App, but this does not include investments made by the participant operators, both in cash but also in kind, including management time to both establish the App and to administer our ongoing involvement.

There is no doubt value for a portion of the public in having tickets and journey planning information for all modes on a single MaaS app. However, **the level of usage set against the level of effort and expense in setting up, administering and maintaining this separate app seems quite disproportionate.** It would strongly weigh against us wishing to replicate the process to participate in additional places where we operate.



## Concluding Comments

**As we explain above, we would have expected the relevance of the Breeze App to the public to be much higher than it has been to date:**

- There is a “captive market” for inter-modal trips over the Solent, including significant numbers of regular commuters.
- There is already an exceptionally high bus mode share, not only the core urban market of Southampton but across the Isle of Wight. Easier integration of trip planning and payment with other modes therefore might be expected to have excited more public interest.
- This reflects intense and frequent bus services. On the Island we run our core services almost 24/7/365 – partly to support the ferry operation and off-Island multi-modal journeys.

Were it the case that we were seeing a rising trend, however slow, we might take some comfort. Thus far, such a trend is not identifiable.


**Overall, thus far we do not see evidence that the Breeze App, technically impressive though it seems to be, has garnered any real market impact or acceptance,** certainly where trips involving bus use are concerned. Given the fact that wider statistics make plain the bus offer is much more relevant to the public on both the Island and in Southampton than is the case elsewhere in most of England outside London, this cannot be read as realistically being explicable that the bus offer itself is not attractive, therefore not purchased.

The clear bias towards trips within the Southampton urban area, with very little apparent use on the Isle of Wight, suggests **a wide range of additional factors militate against the perceived utility and relevance of the MaaS offer in a more rural compared with an urban context** and demographic mix.

**There is no evidence at all that the deployment of any of the MaaS and multi-modal platforms in the wider Solent area has secured mode shift from car use.**

I trust that this information satisfies your needs. Don't hesitate to contact me if you need to clarify anything.

Yours sincerely



Head of Built Environment and Infrastructure