

Stroud District Local Plan Review Additional Technical Evidence – Limited Consultation.

On behalf of Robert Hitchins Ltd in respect of Land North
West Stonehouse PS19a

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Author: [REDACTED]



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APPENDIX 1: PIONEER RESPONSE TO EB11, EB11A AND EB111B



1. Introduction

- 1.1. Pegasus Group has been instructed by Robert Hitchins Ltd to respond to the consultation on Stroud District Local Plan Review Additional Technical Evidence. This follows from our representations to the Reg 19 Local Plan consultation submitted in July 2021.

- 1.2. **PFA Consulting and Pioneer Housing and Development Consultants** have responded to the following documents:
 - EB98 Traffic Forecasting Report Addendum
 - EB108 Sustainable Transport Strategy Addendum (July 2022)
 - EB109 Transport Funding and Delivery Plan (July 2022)
 - EB110 Infrastructure Delivery Plan (IDP) Addendum Report (August 2022)
 - EB111 Stroud Local Plan Viability Assessment 2022 Refresh Report (August 2022)
 - EB111a Stroud Local Plan Viability Assessment 2022 Refresh Appendices 1-11
 - EB111b Stroud Local Plan Viability Assessment 2022 Refresh Appendices 12-18
 - EB112 SALA Accessibility Scoring Note (August 2022)
 - EB112a SALA Transport Accessibility Assessment November 2020
 - EB112b SALA Transport Accessibility Assessment October 2019
 - EB112c SALA Transport Accessibility Assessment July 2018

- 1.3. In each case we have referred to the policies and provide a summary, where necessary the full response is attached as an Appendix to each section.

2. EB98 Traffic Forecasting Report Addendum

- 2.1. Comments: Which sites or policies do our comments relate to:
- **Policy PS19a NW Stonehouse**
- 2.2. The updated modelling work which has informed the Addendum provides a cumulative assessment of the traffic impacts associated with the emerging Local Plan site allocations and proposed highway mitigation. It reflects the revised site allocations and quantum of development now proposed, which includes a revision to PS19a NW Stonehouse where dwelling numbers have increased from 650 to 700.
- 2.3. The overall impacts of the updated modelling have shown that the revised Local Plan allocations do not appreciably affect the proposed highway mitigation previously identified in the original traffic forecasting report; although the increased development at Javelin Park comprising 27 hectares will likely put greater pressure on the highway network in and around M5 J12 which may require additional mitigation.
- 2.4. The highway mitigation proposes significant upgrades to two of the three motorway junctions serving the District; both M5 J12 & M5 J14 suffer from a lack of capacity to accommodate any significant development.
- 2.5. With respect to PS19a NW Stonehouse the highway mitigation in the vicinity of the site is the same as the original traffic forecasting report, comprising signalling of the approaches to M5 J13, widening of the A419 between Oldends Lane and Chipmans Platt roundabouts and widening of the A419 approaches at the Boakes Drive roundabout.
- 2.6. **The junction performance tables provided at Appendix C of the Addendum show that without mitigation M5 J13 performs relatively well with a maximum link V/C of 90% in the 2040 unmitigated Local Plan scenario (Appendix C Tables C1 & C2).** Given these results is an improvement of signalisation at M5 J13 warranted? The modelling highlights that development in this locality can come forward early in the plan period without the need for expensive highway mitigation; this is not the case for those developments which have an impact at M5 J12 & M5 J14 – the modelling has shown these junctions to be operating well over capacity with significant queuing and delay without suitable highway mitigation.
- 2.7. **The updated modelling does not provide the evidence to suggest that widening of the A419 between Oldends Lane and Chipmans Platt roundabouts is required to mitigate the impacts of the Local Plan development.** The results in Tables C1 & C2 at Appendix C show a maximum link V/C of just 81% in the 2040 unmitigated Local Plan scenario.
- 2.8. It is noted that the Infrastructure Delivery Plan 2022 Addendum (EB110) recommends alternatives be explored for the two highway capacity schemes at the A419 / Oldends Lane roundabout and A419 / Boakes Drive roundabout in Stonehouse which is welcomed.
- 2.9. The updated traffic modelling was undertaken prior to the completion of the work on the STS Addendum; the further reductions in traffic from the additional Sustainable Transport Strategy (STS) intervention measure now proposed are not realised in the model results. If these were included the level of highway mitigation may be reduced.

- 2.1. A review of the traffic modelling work for PS19a NW Stonehouse has found that the Local Plan SATURN model is very strategic in nature modelling only key corridors and junctions. It does not model more minor links or the detailed access arrangements of strategic sites. More detailed analysis of the model outputs will therefore be required to inform the Transport Assessments for individual sites to enable the traffic impacts on the local highway network to be fully realised to establish the appropriate form of highway mitigation that will be needed.

Summary

- 2.2. **The updated traffic modelling reflecting the revised allocations has not accounted for the additional interventions set out in the STS Addendum; the identified highway mitigation needs to have more scrutiny as a number of the schemes don't appear to be necessary based on the modelling results. It would be beneficial to have more detail of the more major mitigation schemes, notably at M5 J12 & M5 J14, as the delivery of these will be key in delivering Local Plan growth. The updated modelling has shown that the additional development at Javelin Park will put further pressure on the operation of the highway network at M5 J12 for which further mitigation is likely.**

3. EB108 Sustainable Transport Strategy Addendum (July 2022)

3.1. Comments: Which sites or policies do our comments relate to:

- Policy PS19a NW Stonehouse
- Policy CP6 Infrastructure and developer contributions
- Policy CP13 Demand management and sustainable travel
- Policy EI12 Promoting transport choice and accessibility

3.2. The Sustainable Transport Strategy (STS) Addendum was prepared to reflect changes to policy and guidance framework since the original publication of the STS in 2019. It responds to changes in the site allocations which includes PS19a NW Stonehouse where the housing numbers have increased from 650 dwellings to 700 dwellings.

3.3. The policy updates include DfT's 'Decarbonising Transport: A Better, Greener Britain' which was published in 2021 and sets out the UK Government's plan to decarbonise transport and achieve net zero emissions from all transport modes by 2050. It draws on the 'Decarbonising Transport: Setting the Challenge' published in 2020 which concluded that a substantial shift to active travel and public transport is imperative to meet the 2050 target. Public transport needs to be cost-effective and convenient to encourage fewer people to drive and increase public transport usage, with walking and cycling being the natural choice for all shorter journeys and part of longer journeys by 2040.

3.4. The local policy updates include reference to Gloucestershire Bus Service Improvement Plan (BSIP) which was produced by GCC in 2021. The BSIP focusses on an overall ambition for bus travel to be the de-facto choice for all transport requirements with improved integration with other transport modes a central part of the Plan. It has identified the A419 routes to/from Stonehouse / Gloucester as a key corridor for an expansion of the "Express Bus" network.

3.5. These policies are supported, however, to achieve the carbon emission reductions needed to meet the policy objectives and targets set out above, it will be important that the Local Plan allocates development in locations that are already sustainable or can be made sustainable. This is the case for PS19a NW Stonehouse, it can offer a realistic choice of sustainable transport modes limiting the need to travel by car which will help to improve air quality, cut emissions and reduce congestion.

3.6. The Addendum reiterates that PS19a NW Stonehouse should:

- Provide high quality and accessible cycling and walking routes, which connect the development to Great Oldbury local centre, employment and local schools and open spaces.
- Provide appropriate off-site active travel infrastructure and routes to connect the new development with key destinations such as Maidenhill school, Stonehouse town centre, Stroud and Stonehouse railway station;

- Support and contribute to sustainable transport measures on the A38 and A419 sustainable transport corridors.
- 3.7. The original STS devised a number of strategies in relation to movement corridors including the A38 that forms a north–south spine through the area and the A419/B4008 connecting Stroud and Stonehouse with the M5 and Gloucester. A number of additional interventions (following a review of the Gloucestershire Local Transport Plan 4 (GLTP4)) have been identified for consideration alongside the emerging Local Plan which were not previously covered by the STS.
- 3.8. Those additional interventions identified in proximity and of relevance to PS19a NW Stonehouse include:
- Strategic P&R and interchange hub at M5 J12 (Ref: CSV 7)
 - New railway station for Stonehouse on Bristol to Birmingham Line (Ref: SD 20)
- 3.9. The strategic interchange hub at M5 J12 aims to intercept existing trips into and out of Gloucester from the M5 to the south. The hub would encompass car sharing, community transport demand responsive services, bus, rail and bike interchange facilities. It is hoped this will reduce traffic along the A38 and encourage greater uptake of sustainable transport modes.
- 3.10. Interchange hubs are supported; however, it is surprising that an interchange hub at M5 J13 is not also identified in the STS Addendum, particularly as it has been identified as a scheme in the Arup Infrastructure Delivery Plan 2022 Addendum (EB110). Oddly the M5 J12 interchange hub is not identified as a scheme in the IDP Addendum?
- 3.11. DfT has awarded Restoring Your Railway funding to SDC to investigate a new railway station in Stonehouse (Bristol Road) on the Bristol – Birmingham line, which would greatly improve access to destinations including Bristol, Birmingham, Cheltenham from the Stonehouse / Stroud area. SDC has commenced with the production of a Strategic Outline Business Case (SOBC) for the new station which will test options and deliverability, with the objective of progressing a scheme towards delivery.
- 3.12. PS19a NW Stonehouse has been identified as an important contributor towards the re-opening of the Stonehouse Bristol Road rail station. Representations have been made which have objected to this requirement. At the current time the scheme is only at feasibility stage and subject to the SOBC; there is no guarantee that it will come forward. Table 5.1 in the STS Addendum acknowledges this highlighting the “insufficient certainty over delivery of Stonehouse Station”.
- 3.13. The STS Addendum at Appendix A provides an update to the STS Framework¹ which sets out the potential mode shift that could be achieved by the main interventions included in the updated STS. However, it is acknowledged that the updates to the STS Framework were not included in the updated traffic modelling detailed in the Traffic Forecasting Report Addendum (EB98), citing that any updates to the traffic modelling to include these revisions would unlikely materially influence the overall conclusion that the Local Plan traffic impacts

¹ Appendix K of the Stroud Local Plan Traffic Forecasting Report, March 2021



can be successfully mitigated, and that the additional measures contained in the STS Addendum is likely to reduce the reliance on highway capacity enhancements within the mitigation strategy.

Summary

- 3.14. **PS19a NW Stonehouse is aligned with the Sustainable Transport Strategy (STS) Addendum in that it can offer a realistic choice of sustainable transport modes, limiting the need to travel by car by maximising accessibility to low-carbon modes of transport, with walking, cycling and public transport prioritised. This will help towards achieving SDC's target of carbon neutrality by 2030.**

4. EB109 Transport Funding and Delivery Plan (July 2022)

4.1. Comments: Which sites or policies do our comments relate to:

- Policy PS19a NW Stonehouse
- Policy CP6 Infrastructure and developer contributions
- Policy CP13 Demand management and sustainable travel
- Policy EI12 Promoting transport choice and accessibility

4.2. The Funding and Delivery Plan (FDP) has been prepared on behalf of SDC to inform the ongoing production of the IDP. The key aim of the FDP is to determine the sources of funding for major transport mitigation, specifically in relation to the amount of funding to be delivered by SDLP development allocations as well as from future strategic development within neighbouring local authority areas.

4.3. The FDP informs the IDP and viability assessment. It does not consider all necessary transport mitigation but focuses on three 'Mitigation Packages' which have been identified as strategic and requiring funding from multiple sources.

4.4. The FDP explains that the approach to mitigating the highway impacts of the SDLP is in accordance with the sustainable transport hierarchy. However, it is acknowledged that for some locations the most appropriate mitigation is likely to comprise highway and traffic measures e.g., M5 J12 and J14.

4.5. The FDP explains that the mitigation schemes identified through the strategic modelling exercise have been reviewed in terms of cost; scale of impact to be mitigated; the origins of the traffic impact; and the appropriateness of the scheme in relation to SDC's climate emergency agenda. It states that this has been undertaken in collaboration with GCC, SDC, NH and South Gloucestershire Council (SGC) but crucially not the JCS authorities.

4.6. The FDP has focused on the three key packages of mitigation at M5 J12, M5 J14 and A38 Corridor, to determine how they can be funded to inform the IDP. These are the "big-ticket" items which are exceptionally costly and where affordability and deliverability will be key in delivering the Local Plan growth.

4.7. The indicative costs that have been identified in the FDP for the three packages of mitigation measures are set out in Table 2; with the exception of the M5 J14 package, the costs have been derived from those originally identified in the GLTP4 which were simply approximate cost bandings and not based on any detail. Given the importance of these mitigation packages to the delivery of the Local Plan more informed costings are advisable as they appear to be significantly underestimated.

4.8. The scheme cost for a new grade separated junction at M5 Junction 12 set out in Table 2 is £6.25m. The source is quoted as the IDP. The accompanying text confirms that the values presented are half the midpoint costs of those outlined in the GLTP4, which is an estimated cost band of £5m - £20m, so $£12.5m \div 2 = £6.25m$. GCC has advised that the costs are based

on experience of scheme delivery as a Local Highway Authority and contingency allowances are inherently included. There is no detail as to how the cost band of £5m – £20m has been derived and it is considered that the scheme cost of £6.25m for a new grade separated junction at M5 Junction 12 is a gross underestimate based on a crude methodology. By way of sense check, the FDP includes a scheme cost of a new grade separated junction at M5 Junction 14, prepared by AECOM and this is £27,246,837 excluding land cost.

- 4.9. Furthermore, a recent contract has been awarded for £38.1m from the Housing and Infrastructure Fund to deliver highway improvements on the A249 to the west of Sittingbourne in Kent². The scheme is to improve the Grovehurst Road and A249 junction by replacing the existing “dumbell” junction with a two-bridge flyover. This would be similar to what is being proposed for M5 J12 & M5 J14 albeit it is not a Motorway. This confirms our concerns that the costings provided in the FDP and IDP Addendum are grossly underestimated.
- 4.10. As the costs of the package of mitigation schemes is the starting point before apportioning funding to allocated sites, it is imperative that the costs are realistic, even if they are indicative at this stage. The level of funding will impact the affordability and deliverability of the proposed mitigation which will have implications on the soundness of the Local Plan in delivering development in a timely manner. The traffic modelling has shown that these improvements are needed before any significant development can come forward.
- 4.11. The M5 Junction 12 and M5 Junction 14 packages are in relation to junctions with the SRN. The FDP states that further to discussions with NH, it is understood that neither of these locations is likely to receive Road Infrastructure Strategy (RIS) funding within the timescale of the SDLP. As such, alternative funding and delivery needs to be identified within the SDLP.
- 4.12. The FDP confirms that both the costs and apportionment have been supplied to ARUP, the authors of the IDP, to ensure that a consistent and appropriate cost can be applied within the IDP, which feeds into the viability analysis. The FDP later states that the preparation and examination of the SDLP is a point in a process, and SDC will continue to work with the parties as other plans progress, in order to refine the mitigation schemes and the funding apportionment.
- 4.13. A methodology is set out to:
- Differentiate between SDLP Growth and Background Growth
 - Differentiation between Economic Growth and Growth Driven by Development in Neighbouring Authorities

² <https://www.kent.gov.uk/roads-and-travel/road-projects/planned-road-projects/A249-Grovehurst-Road-and-Key-Street>

- Differentiation of Growth from Neighbouring Authority Development
- Apportionment of SDLP Funding to Allocation Sites

- 4.14. Table 8 of the FDP sets out the proportional impacts from the SDLP applications. It can be seen that PS19a NW Stonehouse has little impact on any of the mitigation packages (3% or less). The SDLP has applied a “sifting” process whereby those development which have less than 5% impact on the mitigation package network are not considered suitable to provide funding and the allocation has been re-assigned to the remaining sites on a pro-rata basis (Table 9); this approach is supported. There appears to be an error in the sifting process in respect of PS36 Sharpness. Table 8 shows a 5% ‘impact’ on M5 Junction 12 and Table 9 shows 0%; PS36 Sharpness has been incorrectly sifted out. Table 10 confirms that no funding is required from PS19a NW Stonehouse for any of the three mitigation packages for M5 J12, M5 J14 & A38 corridor.
- 4.15. Critical to the delivery of the plan, the FDP calculates that circa 72% of the cost of the total of the three mitigation packages should be funded by Neighbouring Authorities. This is broken down in Table 11 as follows – M5 J12: 42.3%, M5 J14: 80.3% and A38 corridor: 39.6%. This confirms that there is a significant reliance on Neighbouring Authorities for funding the key strategic highway infrastructure needed to support growth in the SDLP.
- 4.16. According to the FDP, it will be for external Local Plans to apportion funding requirements to allocations, as those Plans come forward and from SDC’s perspective, there is a reasonable prospect that this funding will become available, based on the remaining a need for Neighbouring Authorities to allocate and deliver housing, and the apportionment method used being fair and proportionate. In addition, there are potentially external funding sources, such as Homes England, which may be available to unlock housing growth should there be a funding shortfall in future. However, as set out in the FDP the West of England Combined Authority’s Spatial Development Strategy is currently in abeyance, with no timescale or certainty on its next steps; and the SGC Local Plan is in a very early stage, as is the Gloucester, Cheltenham, Tewkesbury Joint Spatial Plan thus, limited information is known on the locations or timing of housing growth outside of the Stroud District.
- 4.17. It is known that there is a longstanding history of under investment in M5 Junction 12, which has impacted the delivery of the current Local Plan. The capacity of the junction has resulted in sites that have been allocated for development in the adopted Local Plan being held up.
- 4.18. Whilst the FDP and IDP identify improvements to both M5 J12 & M5 J14 there are no drawings detailing what is proposed for this key strategic highway infrastructure which are fundamental for delivering the Local Plan growth. It is understood that an interim scheme for M5 J14 has been considered by National Highways; however, no details have been provided.

Summary

- 4.19. **It is of paramount importance to the SDLP that schemes and accurate cost estimates for M5 J12 & M5 J14 are established together with realistic apportionment of funds to determine any shortfall such that sources of funding can be secured to provide certainty and the timely delivery of the Local Plan. There is a gross underestimate of the cost of M5 Junction 12, errors in the apportionment of impacts and an expectation that significant proportions of the funding of the mitigation packages will come from Neighbouring Authorities. This has not been discussed with the JCS authorities and there is no timescale or certainty and limited information on the locations or timing of housing**



growth outside of the Stroud District as acknowledged by the FDP, (the preparation of the review of the JCS has slipped against the original LDS and a Preferred Options consultation is envisaged in Spring 2023). This questions the affordability and deliverability of the proposed mitigation packages to deliver the Local Plan growth, particularly early on in the plan period.

- 4.20. The FDP has confirmed that the updated traffic modelling has shown that PS19a NW Stonehouse has little impact on the key strategic infrastructure comprising the mitigation packages; and that the allocation is not required to contribute to their funding.

5. EB110 Infrastructure Delivery Plan (IDP) Addendum Report (August 2022)

5.1. Comments: Which sites or policies do our comments relate to:

Policy PS19a NW Stonehouse

5.2. Section 3 of EB110 provides a site-by-site summary of infrastructure requirements. Table 7 sets out a Housing Trajectory for each of the Strategic Site Allocations. Through the Statement of Common Ground (Draft 14.09.2022) we have amended the trajectory as follows:

2020-2025	2025-2030	2030-2035	2035-2040	TOTAL
0	275	360	/	635

5.3. The Infrastructure Delivery Plan (IDP) 2022 Addendum provides an update to the 2021 IDP; it identifies infrastructure required to support housing and employment growth, including estimated costings for such infrastructure.

Transport and Highways

5.4. The document refers to the “AECOM Mitigation Review” which has reviewed the mitigation proposed within the Traffic Forecasting Report and the GLTP4. It is unclear if this “review” is documented as nothing has been published to date. What is clear is that the AECOM review has informed the package of mitigation included within the IDP Addendum and the Funding and Delivery Plan (EB109) which focuses on the transport infrastructure requirements at three key locations: M5 J12, M5 J14 & the A38 corridor. These three packages of mitigation are the “big-ticket” items, the cost and deliverability of these will be key in ensuring the soundness of the development strategy of the Local Plan.

5.5. There are two key highway infrastructure projects on the strategic highway network at M5 J12 & M5 J14 which are bound to be extremely costly where the risks in terms of affordability and deliverability will be inflated. Both these junctions operate close to capacity today so the ability to deliver any significant development at these locations without any improvement will be limited.

5.6. **The costings given in the IDP Addendum for M5 J12 appear to be significantly underestimated; a value of 6.25m for a new grade separated junction cannot be correct.** It is understood that the costings have been based on what was included in the GLTP4 where a range of 5m–20m was identified for capacity and safety improvements at M5 J12 (GLTP4 page 214 Ref: CSV13). The 6.25m value was calculated by taking half of the midpoint cost (12.5m/2=6.25m). This methodology is very crude given the importance of the mitigation at M5 J12 in the Local Plan.

5.7. The AECOM mitigation review established the cost of a new grade separated junction at M5 J14 to be 27m identified. Given that the improvement at M5 J12 is broadly similar to that at M5 J14, you would have thought that a “sense check” would have highlighted the issue of the unrealistic cost given for M5 J12?

- 5.8. By way of a comparison, a recent contract has been awarded for £38.1m³ from the Housing and Infrastructure Fund to deliver highway improvements on the A249 to the west of Sittingbourne in Kent. The scheme is to improve the Grovehurst Road and A249 junction by replacing the existing “dumbell” junction with a two-bridge flyover. This would be similar to what is being proposed for M5 J12 & M5 J14 albeit it is not a Motorway. This confirms our concerns that the costings provided in the IDP Addendum are grossly underestimated.
- 5.9. With respect to M5 J13 the IDP Addendum states that PS19a NW Stonehouse along with other site allocations would be expected to contribute towards a scheme of improvement comprising signalisation of approaches. Our representations on the Traffic Forecasting Report Addendum have highlighted that M5 J13 performs relatively well with a maximum link V/C of 90% in 2040 without mitigation (Tables C1 & C2 in Appendix C of TFR Addendum). This questions the need for an improvement at M5 J13. This along with the modest nature of the mitigation proposed for M5 J13 will enable development in this locality to come forward early in the plan period without the need for expensive highway mitigation as is required for M5 J12 & M5 J14.
- 5.10. With regards to other junction improvements which includes improvements to junctions on the A419 the cost calculation is set out as being:
- Half of midpoint cost of the transport scheme from the LTP or TFR / total allocated housing numbers within the cluster = cost per unit
- 5.11. As previously discussed, this estimation relies on the costs in either the LTP or TFR being correct; we question these costs given the broad ranges provided. Furthermore, the above approach only appears to apply to allocated housing numbers; it seems to disregard allocated employment which in the case of PS20 EcoPark M5 J13 will have a relatively big impact on traffic flows on the A419 corridor at Stonehouse.
- 5.12. It is welcome that Table 1 in the IDP Addendum has recommended that alternative schemes to the highway improvements at the A419 Oldends Lane and Boakes Drive roundabouts be considered as part of the mitigation strategy. As previously identified the updated traffic modelling does not provide the evidence to suggest that the proposed improvement to the A419 Oldends Lane roundabout is needed as it shows a maximum link V/C of just 81% in 2040 without mitigation (Tables C1 & C2 in Appendix C of TFR Addendum).
- 5.13. The following six transport schemes have been identified in Table 22 in Appendix A which the AECOM mitigation review considers may require planning obligations from PS19a NW Stonehouse. The costs given are the total estimated costs with no apportionment analysis provided.
- Strategic Park & Interchange hub scheme for M5 J13/A419 – £3,125,000
 - Active Travel Route – Stroudwater Navigation to Gloucester & Sharpness Canal – £4,000,000

³ <https://www.kent.gov.uk/roads-and-travel/road-projects/planned-road-projects/A249-Grovehurst-Road-and-Key-Street>

- Improvements to National Cycle Network, Route 45, Stroud – £625,000
- Stonehouse Railway Station improvements –£625,000
- A419 / Oldends roundabout improvements – £1,562,500
- A419 / Boakes Drive roundabout improvements – £31,250

- 5.14. It is somewhat surprising that the interchange hub at M5 J13/A419 is included, whilst this is a scheme identified in the GLTP4 (Ref: SD 1) it was not identified in the STS Addendum (EB108). Conversely the interchange hub at M5 J12 (GLTP4 Ref: CSV 7) was identified in the STS Addendum but not included in the IDP Addendum? The cost of £3,125,000 is questionable as it has been based on the broad cost band of £5m–£20m in the LTP; all other interchange hub sites including that at M5 J12 have a cost band of £200k–£5m; one can only assume the inflated value was an error given that no interchange sites have been identified.
- 5.15. The Stroudwater Navigation to Gloucester & Sharpness Canal is fairly remote from PS19a NW Stonehouse. The funding status in the GLTP4 has identified the active travel scheme (Ref: SD 3) as being “secured”?
- 5.16. Table 1 of the IDP Addendum has recommended that alternatives be explored for the two highway capacity schemes at the A419 / Oldends Lane roundabout and A419 / Boakes Drive roundabout in Stonehouse. These two schemes on the A419 which are identified in the preferred highway mitigation strategy may therefore well change. The updated Local Plan modelling does not suggest an improvement at the A419 / Oldends Lane roundabout is needed to accommodate the Local Plan development as it operates within capacity.
- 5.17. The text in the IDP Addendum report for PS19a NW Stonehouse (3.7.1) expects the development to contribute to a scheme of mitigation at M5 J13. Table 22 does not however include a scheme of mitigation for M5 J13?

Education

The need for the Local Plan Review to set out a clear policy requirement

- 5.18. Section 2.2.4 of EB110 (the IDP) recognises that there is no up-to-date evidence backed method to assess pupil demand arising from new development.
- 5.19. In the absence of this necessary evidence, the IDP proposes that the number of pupils arising should be assessed on a case-by-case basis having regard to a range of material considerations.
- 5.20. This would mean that the Local Plan Review would be contrary to national policy and guidance including because:
- i. It would not set out the levels of educational infrastructure required contrary to paragraph 34 of the NPPF.
 - ii. A new approach could be introduced which may undermine the deliverability of the Local Plan Review contrary to paragraph 34 of the NPPF, as has happened in the recent

past with the County Council introducing a new untested approach through the Local Developer Guide.

- iii. The policy requirement would not be clear contrary to the PPG (23b-004).
- iv. The policy requirement would not be informed by evidence of infrastructure need contrary to the PPG (23b-004) and the PPG (23b-005).
- v. The policy would defer the approach to be set out in supplementary planning documents or supporting evidence base documents contrary to the PPG (23b-004).
- vi. The deferral to documents which are not Development Plan Documents would have the effect of introducing a new standard or policy requirement contrary to the PPG (61-008), which would be contrary to Regulation 5(1)(a)(iv) of the Town and Country Planning Act and unlawful according to the High Court in numerous cases including *William Davis Ltd v Charnwood Borough Council [2017] EWHC 3006 (Admin)*, and *Skipton Properties Ltd v Craven District Council [2017] EWHC 534 (Admin)*.
- vii. Local communities would not be involved in the setting of the policy requirement contrary to the PPG (23b-004).
- viii. In the absence of a clear standard, it would not be possible to viability assess the combined policy requirements to demonstrate that the package of policies do not undermine the deliverability of the Development Plan contrary to the PPG (23b-003), (23b-004), (23b-005), and (23b-011) and the third bullet point of the Purpose of the DfE guidance entitled Securing Developer Contributions for Education.
- ix. It would not set out the contributions expected towards educational infrastructure including pupil yields contrary to the PPG (23b-008).
- x. The policy requirement would not be fairly and openly tested at examination contrary to the PPG (23b-004) and (23b-013)
- xi. It would not contain a policy requirement for calculating educational needs contrary to paragraphs 14 and 19 of Securing Developer Contributions for Education (DfE).

5.21. National policy and guidance are therefore explicit that the levels of educational infrastructure required are to be set out in the Development Plan, and the introduction of a different policy requirement through a subsequent Supplementary Planning Document or evidence base as proposed is not only explicitly contrary to the PPG (23b-004), but it would be contrary to the regulations and unlawful.

5.22. Indeed, as has proved to the case in Gloucestershire recently, the County Council sought to introduce a new approach through an evidence-based document, namely the Local Developer Guide, which was found to be methodologically flawed in the appeal decision at Land at Coombe Hill. The introduction of this new approach was demonstrated to undermine the deliverability of a number of Development Plan Documents across Gloucestershire (particularly in Gloucester City). It also resulted in significant delays to the delivery of sites whilst viability assessments were undertaken to demonstrate that individual developments could not accommodate this new approach and in consequence delivered a reduced level of affordable housing, until after a couple of years this new approach was found to be flawed in the appeal decision.

- 5.23. The requirement for pupil yields to be set out in the Local Plan Review is not only necessary to accord with national policy and guidance, but this is particularly important in Gloucestershire where the County Council are in the process of updating their pupil yields and will doubtlessly seek to apply these once the work has been completed. This new work could theoretically identify a need for early years places which could place an additional financial burden equivalent to that which arises from primary school places⁴ which has not been taken into account in the Viability Assessment. This significant additional cost could undermine the deliverability of the Local Plan Review, which is why it is necessary to set out the pupil yields in the Local Plan Review and for these to be viability assessed as set out repeatedly in the PPG and the DfE guidance and for educational needs to be assessed on this basis until the Local Plan Review is reviewed and viability assessed to take account of any newly arising evidence on the number of pupils arising.
- 5.24. In such circumstances, to accord with national policy the District Council must either:
- i. robustly assess the pupil yields based on the information that is currently available, viability assess the consequences of these, set them out in the Development Plan and apply these until such time as the Local Plan Review is reviewed in the knowledge that the County Council is currently in the process of preparing new evidence; or
 - ii. await the completion of the work by the County Council and take account of this alongside the other available evidence to identify robust pupil yields, viability assess the consequences of these, set them out in the Development Plan and apply these.

The pupil yields

- 5.25. In light of the Land at Coombe Hill appeal decision, the County Council has recognised that the pupil yields of the previous Local Developer Guide are flawed and should not be relied upon. To address these flaws, the County Council has prepared an Interim Position Statement which adjusts the pupil yields of the Local Developer Guide based on a series of unrepresentative datasets. The County Council acknowledges that this is only an interim position which they recommend is applied prior to the publication of a comprehensive review of pupil yields. Clearly, it would be inappropriate for a Development Plan which may not be reviewed for five years to rely upon such an interim position.
- 5.26. Furthermore, the IDP correctly recognises in section 2.2.3 that the pupil yields identified in the Interim Position Statement are much higher than would be expected, with a total of 7,420 primary to post-16 pupils arising as compared to the 5,211 that would be expected based on the District Council's own analysis. If further confirmation of this is required, the Interim Position Statement assumes that there will be 61 additional pupils in every 100 homes whereas in reality over the previous five-years the number of pupils across Gloucestershire has increased by 4,567 during which time 16,117 net additional homes have been developed providing an actual pupil yield of 28 additional pupils in every 100 homes.
- 5.27. This over-estimation is likely to be at least in part attributable to the fact that the pupil yields of the Interim Position Statement assume that every resident pupil in a new home will be

⁴ According to Table 4 of the IDP.

additional to the local population which was found to be “mistaken” in the Land at Coombe Hill appeal decision.

- 5.28. In light of this, it would not be justified to draw reference to the pupil yields of the Interim Position Statement as proposed in section 2.2.4 of the IDP given that the District Council recognise that these are anomalous.

The proposal of section 2.2.4

- 5.29. The proposal of the IDP is that educational needs should be considered on a case-by-case basis taking account of numerous different potential pupil yields including that set out in the Interim Position Statement, that identified by the District Council and any subsequent estimates.
- 5.30. This provides no clarity as to how educational needs will be determined contrary to the requirements of the PPG (23b-004) and as such this cannot be accurately accounted for in the price paid for land. Depending on the yields applied this may then result in developments becoming unviable with the result that some developments may be unnecessarily delayed, and a reduced level of affordable housing may be delivered, or unable to come forward at all.
- 5.31. This lack of clarity also allows the County Council (as they have done previously) or indeed developers to introduce untested new pupil yields which supersede those currently available on an ad-hoc basis to justify a different level of educational contribution. This would inevitably result in significant debate and therefore delay in the determination of planning applications.
- 5.32. For all of these reasons, the proposal set out in section 2.2.4 of the IDP is not only contrary to national policy, but it is so vague as to be ineffective and is likely to have significant adverse effects on the delivery of sites.

The funding mechanism

- 5.33. In paragraph 10.39 of EB111, it is identified that the infrastructure required on strategic sites will be funded in part by CIL, although no detail is provided on how this will operate in practice, and this will again be material to the viability of the Local Plan Review. In the absence of such clarity, the Local Plan will not be effective in supporting the timely determination of viable planning applications.
- 5.34. It is assumed that the methodology set out in Appendix E of the Infrastructure Funding Statement (EB102) will continue to apply such that all educational infrastructure, with the exception of primary schools on strategic sites will be funded by CIL as this is the basis upon which the operative CIL Charging Schedule was justified. This should be set out in the Development Plan as inferred by the PPG (25-010) and (25-021) to ensure that there is a viable, clear and effective mechanism to determine planning applications.
- 5.35. Without such clarity, developers may either resist submitting planning applications as they may consider these unviable if educational infrastructure is to be secured through s106, or decision-takers may mistakenly request s106 contributions towards education contrary to the intended operation of the CIL Charging Schedule and the recently adopted Infrastructure Funding Statement.

Land North West of Stonehouse (PS19a)

- 5.36. As set out in previous representations, the available evidence demonstrates that there is no need for a primary school to be provided at Land North West of Stonehouse given the significant available capacity in nearby schools.
- 5.37. Nevertheless, the IDP identifies that the County Council expect that a new primary school will need to be provided on site. The need or otherwise for such a school will be determined by the forecast capacity in nearby schools at the time planning permission is granted⁵. These cannot be pre-empted at the current time and as such there is at least a prospect that no such primary school will be required to be provided on this site. As such, the policy requirement for such a school is not justified and the policy wording should be amended to require the provision of this school only if it is demonstrated to be required at the time of the determination of a planning application.

Recreation Mitigation Strategies (page 7)

Cotswold Beechwoods SAC Recreation Mitigation Strategy

- 5.38. It is noted that the Cotswold Beechwoods SAC Recreation Mitigation Strategy was published earlier this year in draft and was recently approved at the Council's Environment Committee on 4th October and will come into effect on 1st November 2022. The strategy identifies a "zone of influence" of 15.4km from the SAC. This zone of influence includes all development locations to the north of Cam and Dursley and to the east of the Berkeley Cluster.
- 5.39. Within this area, all new residential development will be expected to provide mitigation either in the form of Strategic Access Management and Monitoring (SAMM), which relates to managing access and engaging with visitors at the SAC. or Suitable Natural Alternative Greenspace (SANG), through the creation of or improvements to existing greenspace sites. This is to encourage recreational use of open spaces away from the SAC.
- 5.40. Table 8 of the IDP identifies those site allocations that are subject to the Mitigation Strategy and calculates based on the number of dwellings and estimated population a contribution to SAMM. For PS19a the figure is £130,900.
- 5.41. At the time the Reg 19 version of the Local Plan was subject to consultation, Pegasus submitted representations on behalf of Robert Hitchins Ltd as it was considered that the proposed wording of the policy was not appropriate as it implied that on site mitigation was required. We suggested alternative wording: *"Consider any identified impacts in relation to the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC and to contribute to the approved SDC mitigation schemes or undertake an independent mitigation strategy as appropriate"*
- 5.42. In the preparation of the Draft Statement of Common Ground we have stated that the wording of the policy should be revised: "Such financial contributions as can be justified off

⁵ As well as the pupil yields that will need to be set out in the Local Plan Review to accord with national policy.

site work to mitigate against the identified impacts of development upon the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC sites.”

Para 3.7.4 Health and Social Care (page 22)

5.43. It is noted that the IDP states:

“The Primary Care Infrastructure Plan¹² identifies a joint development for Stonehouse and north west of Stonehouse between Regent Street and Stonehouse health clinic or a new single development through Regent Street as a priority development. The new development would provide for an estimated list size of 10,000 patients and would have a capital cost of £2.47m.

Development of a primary care facility in this location is identified as a key priority of the PCIP for 2021 and the CCG anticipate that planning obligations may be required to part-fund the new Stonehouse surgery.”

5.44. The IDP indicates that it may be appropriate to utilise developer contributions from the site secured via a s106 agreement towards this new surgery.

5.45. In our representations to the Reg 19 Local Plan, we stated that a surgery is normally commercially funded and is viable without the need for contributions. The planning permission for Great Oldbury (adjacent to the site allocation) allows for D1 Uses in the Local Centre. This point has recently been made in response to the Draft Statement of Common Ground.

6. EB111 Stroud Local Plan Viability Assessment 2022 Refresh Report (August 2022)

EB111a Stroud Local Plan Viability Assessment 2022 Refresh Appendices 1–11

EB111b Stroud Local Plan Viability Assessment 2022 Refresh Appendices 12–18

Comments: Which sites or policies do our comments relate to:

- 6.1. The response prepared to EB111 and appendices EB111a and E111b is attached in full at appendix 1. This response applies to all site typologies assessed within EB111 and appendices (including proposed allocations) as it raises concerns in respect of various assumptions and approaches within EB111 which are applied to all of the modelled typologies. The appraisal outcomes are considered in Section 6 2 of Appendix 1 to this consultation response.

- 6.2. Listed below are the relevant policies we made reps on:

Policy PS19a NW Stonehouse

- 6.3. It remains the case that specific requirements such as those within Policy PS19a Stonehouse North West for eight plots for travelling showpeople have not been viability tested within EB111 in terms of the potential impact on land value, development viability and site deliverability (nor have any related costs been referred to within the EB110). These concerns were raised in the response submitted regarding this policy in June 2021 on behalf of Robert Hitchins Ltd as part of the Pre-Submission Draft Local Plan for Publication consultation but remain unaddressed.

Policy PS36 Sharpness – follow up our objections made in Reg 19 reps

- 6.4. General viability concerns regarding EB111, EB111a and EB111b are set out in the summary below and in more detail in Appendix 1.

Policy PS46 Whitminster

- 6.5. General viability concerns regarding EB111, EB111a and EB111b are set out in the summary below and in more detail in Appendix 1

Policy DCP2 Supporting older people and people with mobility issues

- 6.6. Policy wording states that ‘major developments will be expected to provide’ two bedroom homes including bungalows that are desirable to older people. The cost to development of this requirement has not been viability tested – EB111 states that ‘this policy does not make any requirements on development, rather it sets out types of development that will be supported’ (paragraph 8.24). This is clearly no longer the case, and the impacts of the new policy requirements need to be viability tested.

- 6.7. EB111 viability tests the use of optional Building Regulations: Approved Document M Category 2 and 3 accessibility and adaptability and wheelchair standards (pages 154 to 155). However, this assessment still fails to reflect the impact of larger floor area and specification requirements on land take and masterplanning, all of which have impacts on scheme viability. Furthermore, given the concerns raised in respect of an underestimation of costs in EB111 (see Appendix 1) the cumulative impact of this policy requirement is not demonstrated to be viable.
- 6.8. Viability concerns raised in the response submitted regarding this policy in June 2021 on behalf of Robert Hitchins Ltd as part of the Pre-Submission Draft Local Plan for Publication consultation remain as stated and unaddressed.

Policy CP7: Inclusive communities

- 6.9. It is unclear how the Council can viability assess the cumulative impact upon development of the cost of imposing the indistinctly described requirements within Policy CP7. Indeed, EB111 and Appendices (and the prior May 2021 Local Plan Viability Assessment Working Draft – “WDLPVA”) confirm that ‘the policy is general in nature’. As such it is not viability tested. Viability concerns raised in the response submitted regarding this policy in June 2021 on behalf of Robert Hitchins Ltd as part of the Pre-Submission Draft Local Plan for Publication consultation remain as stated and unaddressed.

Policy CP8: New Housing Development

- 6.10. The EB111 and appendices do not reflect the impact of different housing mix and tenure requirements where these are to be applied at a Parish Cluster level or specifically assess viability at a sub-area level based on the extent of the Parish Cluster areas having regard to differences in land values and differing mix requirements. EB11 confirms the viability is prepared based on a general mix taken from the 2019 Gloucestershire Local Housing Needs Assessment as opposed to being based on a Parish Cluster specific mix. Viability concerns raised in the response submitted regarding this policy in June 2021 on behalf of Robert Hitchins Ltd as part of the Pre-Submission Draft Local Plan for Publication consultation remain as stated and unaddressed.

Policy CP9: Affordable Housing

- 6.11. First Homes: EB111 states in paragraphs 4.83 and 8.43 that First Homes are tested in a scenario, although confusingly it is noted that paragraph 2.56 states that: ‘The Council does not consider First Homes to be affordable, so these are not included in the base mix.’ However, Government First Homes guidance suggests proposals by applicants should be supported even where transitional Plan Policy arrangements apply.
- 6.12. The Residential Appraisal iterations tested set out in Appendix 12 in EB111b do not appear to include any First Homes and the prior WDLPVA only appeared to test First Homes in conjunction with Affordable Rent as opposed to with Social Rent which will be problematic if the Council seeks Social Rent in conjunction with any proposals including First Homes as any viability impacts will not have been tested at the Plan making stage. Other concerns regarding First Homes and potential viability impacts are detailed in Section 2 of Appendix 1 to this consultation response.
- 6.13. The wording within Core Policy 9 seeks ‘at least’ 30% affordable housing. It is impossible to have an understanding of the economic viability or practical impacts of an open-ended

proposition such as 'at least 30%' affordable housing – the varied Affordable Housing testing summarised at pages 204 to 208 of the EB111 cease at 30%. The Policy wording results in a lack of certainty for those seeking to bring land forwards for development as a full understanding of likely policy cost burdens and masterplanning impacts will not be known. Even if the wording is adjusted to remove the text 'at least' it is not robustly demonstrated in EB111 that '30%' let alone 'at least' 30% will be deliverable in the District alongside the other development cost burdens that will apply.

- 6.14. Affordable housing is one of the largest cost burdens faced by development, and where other mitigating factors cannot be removed / reduced this is a requirement that will need to flex downwards. The majority of the sites tested struggle to support 30% affordable housing under the emerging Plan policies even subject to the adjustments suggested in EB111, and none will be able to do so where additional County Council education s106 contributions are imposed and if realistic BLVs are applied.
- 6.15. Viability concerns raised in the response submitted regarding this policy in June 2021 on behalf of Robert Hitchins Ltd as part of the Pre-Submission Draft Local Plan for Publication consultation remain unaddressed.

Policy HC3: Self-build and custom-build housing provision

- 6.16. There is no robust consideration within EB111 of the potential impacts of seeking self-build / custom build contribution from Strategic Sites allocated in the Plan (not only in terms of plot sale values but also in terms of marketing, masterplanning, timing and any other specific delivery costs).
- 6.17. It is impossible to have an understanding of the economic viability or practical impacts of an open-ended proposition such as 'a minimum of 2%'.
- 6.18. EB111 states in Paragraph 8.49 that the delivery of Policy HC3 has been tested. However, there is no explanation of what the cost has been assumed to be, or on how it is applied within the modelling (including in terms of timing and delivery mechanisms) and the Appraisal sheets are not appended for consideration that may shed light on this. Concerns were raised about this in response to the draft LPVA and the WDLPVA and in the response submitted regarding this policy in June 2021 on behalf of Robert Hitchins Ltd as part of the Pre-Submission Draft Local Plan for Publication consultation; these remain unaddressed.

Policy HC4 Local housing need (exception sites)

- 6.19. No comments to add

Summary

- 6.20. EB111 presents a variety of 'sensitivity' appraisal summaries in addition to the baseline iterations. EB111 also presents appraisal summaries in Appendix 14 of EB111b which reflect the combined impact of 30% Affordable Housing, CIL, s106 at £20k per unit (which broadly reflects the County Education costs plus a £5k per unit local authority s106 cost – subject to further revisions to the County's formula) and the cumulative Draft Plan Policy costs. These confirm that once the combined cost of all these factors are considered, and the Residual Land Values ("RLV") compared to the Benchmark Land Values ("BLV") set in EB111, c.76% of the generic sites tested will be unviable.

- 6.21. County education s106 costs are stated to be reflected in EB111 modelled assumptions for the strategic sites tested, although the May 2021 IDP fails to transparently set out, on a site-by-site basis, how all the different infrastructure items required will be funded (i.e., including in respect of s106 and or CIL), the total costs of this, or the timing of these costs. EB111 confirms that new Strategic Allocations will be subject CIL payments.
- 6.22. Not all of the policy requirements proposed in the Stroud Draft Local Plan will be able to be sought even without factoring in: the concerns raised in Appendix 1 to this consultation response regarding EB111 modelling, additional s106 burdens being sought by the County Council, reduced revenues from Registered Providers as a result of the wider requirements for First Homes and the new Shared Ownership model in the areas in which they operate and how global economics may worsen. As stated in response to the draft LPVA and WDLPVA: emerging policies must be revisited, with wish list policies removed and cost burdens reduced (including through looking at existing Plan policy burdens) to ensure the Plan is deliverable, particularly given the pressures revealed in EB111 to be being placed on ALL of the Strategic Allocations tested.
- 6.23. The adjustments to policies suggested in paragraphs 12.66 and 12.67 of EB111 (which include moving the Affordable Housing tenure to a 50:50 rent / sale split) will not be enough.
- 6.24. Furthermore, the sensitivity testing of combined increased cost / reduced value scenarios (and having regard to the full extent of Affordable Housing, CIL and s106 costs) is crucial. Within the next 5 years (the shortest length of time that usually applies until a review of the evidence base let alone policy) significant economic shocks are likely to occur, particularly due to various global events and significant shifts in Government economic policy here in the UK. Political events in October 2022 have resulted in a significant economic shock seeing markets tumble and the pound falling to its lowest value in decades. Whilst the market has steadied and the pound recovered to a degree, mortgages across all deposit levels are now reported to be at fixed rates of 6.29% to 6.47% – above rates last seen in 2008/2010. Interest rates and lending criteria for borrowing in general (including by housebuilders) can be expected to be impacted.
- 6.25. There have been significant increases in build costs of c.30% over the last eighteen months and since the July 2022 baseline position tested in the LPVA (which will be subject to reporting delays). Tender Price Forecasts (Gardiner and Theobald) suggest a UK average 5.5% annual percentage change for Quarter 4 2022. There is also forecast to be significant further increases by the end of 2023, coupled with forecast reductions of ‘at least 10%’ in house prices being reported in the main stream media, emphasise the need for combined increased cost / reduced value scenarios to be robustly tested.
- 6.26. Appropriate testing within the evidence base can assist the Council with understanding the impact of these (at various trigger points in terms of cost increases / value decreases or combinations of the two) upon development and enable them to draft policies which can respond rapidly to such changes. Notwithstanding a need for additional sensitivity testing, the LPVA22 will need updating to reflect these latest economic impacts which will be having an immediate impact on development viability.
- 6.27. It is noted that NDSS is referred to as having been tested in Table 12.7 and paragraph 12.66 and yet EB111 does not now state that NDSS floor areas are tested when referencing NDSS in paragraph 8.104 and confirms that NDSS are not being sought through the Draft Local Plan (page 168). This point needs immediate clarification.

- 6.28. There is no clear evidence to support how the Strategic Site Scenario A and B costs in Table 7.3 and paragraph 10.8 'c' of EB111 would be split between s106 and CIL, nor any guarantee that this will take place in practice in line with the 80% of CIL being used in lieu of s106 costs assumption in paragraph 10.20 of EB111.
- 6.29. Affordable housing is one of the largest cost burdens faced by development, and where other mitigating factors cannot be removed / reduced this is a requirement that will need to flex downwards. The majority of the sites tested struggle to support 30% affordable housing under the emerging Plan policies even subject to the adjustments suggested in EB111, and none will be able to do so where additional County Council education s106 contributions are imposed and if realistic BLVs are applied.
- 6.30. In this regard the Council's claim in paragraph 12.65 'b' that infrastructure can be funded by CIL so it is unnecessary to assess the full worst case for developer contributions is simply not evidenced anywhere in EB111 to be the position that developers will be faced with in practice. These concerns also apply in terms of how CIL and s106 will interact (if at all) in respect of windfall sites (particularly larger Greenfield windfall sites) such as are tested within EB111 through the generic typologies – the testing should not be relying on arbitrary assumptions promulgated by the Council on the proportion that s106 burdens will be reduced by due to CIL, particularly if no clarity can be provided by the Council to confirm that a new County formulaic approach to education contributions will not be sought from planning applications in Stroud.
- 6.31. In this regard it must be noted that, EB111 (and previously the draft LPVA and WDLPVA) Greenfield Site BLV of £25k plus £350,000 per gross hectare appears to fail to reflect EB111 author's own evidence of policy compliant land sales suggesting an average land sale value of £761k and a median value of £820k (presumably per gross hectare) Gloucestershire wide.
- 6.32. When land is being marketed on the basis of seeking offers for promotion agreements, it is usual that all bidders need to include in their offers, the minimum landowner return figure being proposed. The market is competitive. If realistic offers are not made land will not be secured. The EB111 BLV of £25k plus £350,000 per gross hectare does not reflect the reality (based on the experience of Robert Hitchens Ltd as per the information provided in response to the WDLPVA consultation) that in Gloucestershire values will range between £450k to £775k per gross hectare.
- 6.33. The EB111 recommendation that in the cases of the site typologies where development remains unviable even after policy adjustments within 12.66 and 12.67 of EB111 the Council reverts to site by site viability testing is contrary to the approach advocated within the NPPF paragraphs 34 and 58 which, together with the accompanying national planning practice guidance, places a significant emphasis on the assessment of viability by local authorities at the Plan making stage (albeit with site by site testing remaining an option where justified by planning applicants at the planning application stage).

APPENDIX 1: PIONEER RESPONSE TO EB11, EB11A AND EB111B

7. EB112 SALA Accessibility Scoring Note (August 2022)

EB112a SALA Transport Accessibility Assessment November 2020

EB112b SALA Transport Accessibility Assessment October 2019

EB112c SALA Transport Accessibility Assessment July 2018

7.1. Comments: Which sites or policies do our comments relate to:

Policy PS19a NW Stonehouse

- 7.2. The SALA transport accessibility assessment of residential and mixed-use sites has informed the Sustainable Appraisal (SA) with regard to SA Objective 10 – ‘to ensure that air quality continues to improve’.
- 7.3. The SALA transport accessibility assessment of individual sites is based on their proximity to town/district/local centres, employment sites and services and facilities that people may be required to access on a regular basis. The scoring assumption is that a lower score indicates a shorter journey time and therefore lower likely emissions from traffic.
- 7.4. The assessment however is solely based on existing facilities, it does not allow for local facilities such as schools, employment or local centres that are proposed to come forward either on-site or in close proximity. This is the case for PS19a NW Stonehouse which includes 5 hectares of employment land and a primary school within the allocation, with new facilities at the adjacent Great Oldbury development which includes employment, a primary school and a local centre. If these local facilities had been included in the SALA transport accessibility assessment, the score for PS19a NW Stonehouse would have been more positive.
- 7.5. Furthermore, the assessment has only measured to existing bus stops and does not take account of possible highway and transport improvements as part of development proposals.
- 7.6. In reviewing the MAIDeN datasets which informed the SALA total accessibility scores, a number of anomalies have been identified. For PS19a NW Stonehouse the closest key employment site was identified as ‘Nailsworth Mills Industrial Estate’ when existing significant employment can be found in the locality off Oldends Lane; the nearest local centre /neighbourhood centre was identified as Kings Stanley or Cainscross when other sites in Stonehouse were given West of Stonehouse.



Summary

- 7.7. **There are anomalies in the datasets which question the validity of the SALA transport accessibility assessment which has informed the SA. The assessment only considered existing facilities so does not provide a full picture of accessibility which could be achieved from facilities proposed either on-site or adjacent to a site or from planned transport improvements.**

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

.Cirencester

Pegasus House, Querns Business Centre,
Whitworth Road, Cirencester, GL7 1RT

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