

## **Sharpness Vale Garden Community: Transport Strategy Commentary**

Stagecoach notes that a significant amount of information has been presented publicly by the promoters in recent months, that elaborates upon or supercedes that which has been previously supplied. This is very helpful.

The information submitted within the latest development prospectus is spread across the document in a number of places. There is a specific section on movement and accessibility, which is entirely appropriate given the remoteness of the site and the current near total dearth of realistic choices other than car use from the proposed site and the wider vicinity, and our own duly-made commentary as the largest commercial provider of passenger transport in the county and the immediate area, on where we see the opportunities to take advantage of existing or potential new bus/coach services.

We have previously made plain to the Local Planning Authority the reasons why we are extremely sceptical that any relevant, effective and sustainable public transport offer can be identified and delivered, that serves the Sharpness Vale site. This being the case, we consider that large-scale development at this site cannot be other than almost entirely car-dependent, and that the traffic impacts of the development will have a serious and wide-ranging series of deleterious impacts on the operation of the local and national highway networks, with attendant aggravation of already serious congestion related delays and unreliability on bus networks, operated by ourselves and other bus companies, both locally and miles beyond the proposals.

Following disclosure of further material by the promoters, we elaborate on this logic to assist all stakeholders in the development plan-making process, in assessing and arriving at an appropriate development strategy having regard to all reasonable alternatives, and based on a relevant and proportionate evidence base, as the National Planning Policy Framework requires.

### **1. Development scope and scenarios**

While the site is considered at this time to have a nominal capacity of over 5000 homes, the promoter accepts that it can realistically accommodate **2400 dwellings by 2041**. This no doubt reflects estimates on the point at which development could commence, as well as a putative rate of build and market absorption. There is little clarity on the date of first occupation but assuming annualised build rates of up to about 200/annum, this suggests that the site is expected to offer first occupation about 2028, assuming a few years of suppressed deliver to account for infrastructure provision and site mobilisation over one or more development fronts.

2400 dwellings would support a population of between about 5300 and 6000 people, adding to a modest existing population in Sharpness and Berkeley of about 4500 people, the vast majority in Berkeley itself. Optimistically then, the promotion would give rise to a combined potential hinterland of about 11,000 for any public transport service, though given that Berkeley lies somewhat distant from either a proposed rail halt at Sharpness Vale, and requires a diversion off any bus or coach route from the promotion towards Bristol, exactly how far it can be assumed the combined population would make use of any service offer would be complex to model. This population compares with Cam which with committed development is likely to account for about 10,500 by 2021 and neighbouring Dursley with about 7,500.

Demand for trips to and from the site will thus evolve over this 14-15 year period, and if allocated, presumably beyond. The economics of any passenger or public transport solution – rail or road based – depend entirely on sufficient volumes of demand being realised. In common with all strategic sites, and even more so with entirely new, relatively remote settlements, the **long build up to relatively modest levels of foreseeable demand arising by the end of the plan period creates an immense and unavoidable challenge on the revenue side** of the economic viability equation. As we have pointed out previously, demand from the site will be split, in a number of directions. This is corroborated and reflected by the indicative trip generation and assignment figures supplied by the promoter at section 8 of the prospectus. Demand to any given destination will thus be further damped.

The promoter apparently intends to address this (at least towards Bristol) by supplying a bespoke, contract coach solution (see below), rather than a public transport offer. Presumably, additional peak coach journeys will be added with demand as it is realised. However, this presumes that the solution will be relevant, and that each coach will be commercially sustainable at some point within a relatively short period of time, dependent almost entirely on the demand realised from within the scheme. We discuss the conditions which would need to be fulfilled for these conditions to be met later in this response.

The development is proposing to deliver 2 new Primary Schools – but **no new Secondary School**. We recognise that typically an exclusive hinterland of about 4500-5000 dwellings is typically necessary to justify secondary provision on a sufficient scale to be efficient and effectively provide a broad and balanced curriculum. Nothing is said about where the secondary pupil product of the development will be accommodated. Berkeley UTC is available in the near locality, but it is limited in scale, is only providing place from 14-19, and is some considerable distance from the site: indeed, from many parts of the promotion around Wanswell, it is over 3 miles from proposed housing by the most direct route, which is far from appropriate for walking. Nothing is said about if and how additional capacity would be provided to meet 11-14 needs, or an expanded KS4 and post-16 offer on the site which is very constrained. Accordingly we see no evidence that the site will not give rise to a very substantial requirement for statutory home-to-school transport, demanding dedicated school bus provision off-site. In reality, parental choice involving pupils being driven to various secondary education settings in the wider vicinity as part of journeys to work, make it more likely that car use will prevail for a very substantial proportion of home-to-school journeys.

Section 8 provides a very helpful initial estimate of trip generation at peak times for the site, and the nominal assignment of destinations for these journeys. These are, of course, based largely on 2011 Census journey-to-work data, and have no regard to school and other educational movements, for example.

This is assessed as being about 2000+ off-site peak hour trips in the morning peak, of the 4700 or so total generated, which suggests a very high degree of internalisation indeed: well under 50%. This is a remarkably low figure. In particular during early phases of the development it is inconceivable that either employment or a wide range of facilities will be available on the development, or within immediate reach by walking or cycling. Indeed those available at the former Berkeley power station complex, are well outside of a comfortable walking distance, and there is no attractive or appropriate dedicated cycle provision. This contrasts starkly with virtually all the other proposed

strategic allocations identifiable in the current Local Plan Review consultation, and several of the most credible omission sites, for example east of Whitminster.

Stagecoach continues therefore, to be extremely perplexed by statements within the initial transport evidence base that indicate that the site is “well-connected” to facilities and services. **We see no objective evidence presented by any party that justifies this conclusion.**

## 2. The Sharpness Branch Railway

The presence of the single track freight railway, the remaining portion of a link constructed essentially as a mineral freight line to the Forest of Dean over the River Severn, has been a consistent feature of the promotional narrative justifying this site. It has until now been touted as the principal basis for a high quality public transport link serving the site. In fact, without the presence of this historic and near-derelict asset, it is arguable that there would be any remotely-credible logic for identifying this site for growth on any major scale.

This line once connected the Bristol-Birmingham Main Line to Lydney via a bridge over the Severn, a structure that was severely damaged in an accident in 1960, and which, following a second incident within a very short time, was demolished. The line featured a chord towards the south at which has long since been lifted, and the trackbed sold off and largely reincorporated into adjoining fields. It has been built over entirely adjoining the A38, making reinstatement of this link practically impossible. This leaves an orphaned single track branch with only a northwards connection to the Bristol-Birmingham main line south of Draycott. It is this that the promoters have alluded to reopening for passenger rail use.

The material submitted in support of the promotion is, perhaps understandably, highly elusive about the actual commitment to deliver any rail link to the site within the plan period, despite the strong statements historically advanced. In the latest Prospectus, a “Railway halt” is mentioned for full 5000 unit scheme in box 4.4, but there is no commitment to deliver it within plan period scheme (box 4.5) by 2041.

This is a substantial evolution of the vision for the site, which initially was advanced including a direct link to Yate and Bristol. More recently this has been substantially wound back with statements made at the time of the previous “Emerging Strategy” Reg 18 consultation about tram-trains. However at p.16 under the “car freedom” chapter heading, a highly tendentious statement is made, flying in the face of the explicit proposals earlier in the document, that “there’s likely to be a twice hourly (rail) shuttle service from Sharpness to Cam and Dursley with connecting service to Gloucester and Bristol Parkway”. There is actually neither commitment nor any basis for certainty that this will be achieved at all, much less within the plan period.

The desperation of the promoters to convince stakeholders that the rail connection is a reasonable certainty is conveyed once again at Paragraph 8.17 which indicates the “likely re-opening of the Sharpness railway line to passenger trains, with a new service to Cam *and Gloucester*” (our emphasis). This seems to imply a through service to Gloucester, which would demand the service on the branch line joining the main line, and occupying train paths that otherwise would be available for improvements to much longer-distance services, not least a much-sought improvement in the

frequency of the local rail service between Bristol and Gloucester/Cheltenham and potentially Ashchurch, to two trains per hour.

The actual intentions of the promoter, and the real level of commitment from Network Rail and GCC as a potential project sponsor, actually remain far from clear. The level of support from Network Rail is alluded to, but in the absence of any clear public commitment from those parties that are competent to deliver it, as part of a wider recast and upgrade of infrastructure and train services on the rail route, the greatest level of doubt has to be raised.

The most recent evidence comes from the local press in which the chairman of the Vale of Berkeley Railway Trust, a group of enthusiasts with separate ambitions to re-open the branch as a heritage attraction, have agreed to a joint approach to Network Rail. He is quoted by the South Gloucestershire Gazette on 2<sup>nd</sup> January 2020 as saying *“We have agreed a joint paper with the developers that we will be presenting jointly to Network Rail in the new year (2020)”*. This is evidence that, far from having secured any agreement in principle that Network Rail is happy to investigate (much less progress) any proposals to re-open the line, the project is still very much being driven by the promotional consortium.

This contrasts starkly with the unequivocal, clear and publicly made comments Stagecoach has offered to date to the Local Plan Review process, as to where it sees the greatest opportunities exist for development to take advantage and help catalyse substantial improvements to existing key bus corridors, and, more importantly, the more strategic opportunities that exist to catalyse a step-change in public transport frequency and connectivity using the A38. These opportunities are not merely a response to a single strategic development option, but offer an holistic approach to much more sustainably serve the entire district’s travel demands, both current and future, should the development strategy seek to focus strategic development on this corridor, and in the other locations already identified for growth in the preferred option at Draycott and West of Stonehouse.

We have already made clear as one of the UK’s largest public transport operators, and the largest operator of bus and coach services; that we see no commercial case to provide a relevant bus or coach-based public transport service from Sharpness, on the basis of the proposals advanced by the promoters.

Our core business has involved comprehensive experience of operating the passenger railway over several decades, too. Given that the viability of a rail-based option would require a volume of use an order of magnitude, or more, higher to justify a credible rail-based business case, we see no grounds to believe that a rail based option would be deliverable. The fact that promoter makes no attempt at this stage to commit to achieving this within the plan period, despite the wider narrative, effectively confirms that they themselves have no such confidence, entirely contrary to the impression made by many of their statements, which would appear to wish to lead stakeholders to conclude otherwise.

Stagecoach, along with the Local Planning Authority, is aware that Gloucestershire County Council last year prepared a County Rail Investment Strategy. This is understood to be complete, but is not yet in the public domain. This strategically examines a full range of potential options to improve rail service timetables and capacity, having regard to their technical achievability, a range of very complex trade-offs on the local and wider rail network, and the likely business case for each project, to inform County support, including bids for external funding. We are clearly of the expectation that

this study will confirm quite clearly, that, whatever the relatively modest business merits of reopening the line for any level of passenger service, this would not be justifiable given the fact this would essentially preclude the potential for additional train paths on the Main Line between Bristol, Gloucester and beyond for both local and express services.

Irrespective, without this project being independently, actively and publicly supported by Network Rail, with a commitment to working proposals up for delivery within an identified period, likely to require explicit GCC support as a key partner, it is entirely inappropriate to put any reliance on reinstatement of passenger rail service being realisable.

The evidence and promotional material supplied by the developer consortium, thus very strongly points the Council towards assessing this promotion on the basis of a roads-based access solution only.

### **3. Overall transport and movement strategy**

Any transport strategy for this site is unavoidably presented with exceptional challenges, that are not shared with a range of other potential sites (both draft allocation and omission sites) adjoining or much closer to either existing locations of employment and services; or on existing or potential high quality public transport corridors linking those sites to multiple destinations with credible employment, education, retail and leisure options.

This is because, in the context of Stroud District, the site is as distant from both local and regional key centres of services and employment as it is possible to get. Far from offering “proximity”, as the Prospectus somewhat bizarrely claims, the “uniqueness of this location” (paragraph 8.16) arises principally from its relative remoteness from any larger centres of population, offering key services, employment, and demanding significant levels of external connectivity over extended distances. Gloucester city centre is 30km away via the most direct route. Stonehouse is about 17km away; the nearest significant existing local employment area and one that is likely to see further planned expansion. Aztec West is nearly 25 km distant; other northern fringe destinations further still.

The strongest possible evidence that the site is geographically remote from significant centres of population and economic activity arises, of course, from the presence of the former Magnox nuclear power station at just a mile west of Newtown. Safety considerations led these to be sited as far as they realistically could be from potential receptors in the event of an accident.

In fact, the actual transport and movement strategy, by focusing on Bristol and its northern Fringe and Gloucester as destinations, demonstrates all but explicitly how far the promotion maximises the need to travel off-site, and also maximises the distance that such journeys need to be, compared with almost any other strategic development option. It is exactly these kinds of contexts, with extended distances, a multiplicity of potential destinations, and lack of credible combinations of en-route demand (without abstracting from existing services nearer destinations) where public transport is most challenged in offering a **relevant** choice, and thus one that credibly will be used by large numbers of residents. Service frequencies and flexibility are unavoidably low, and journey times extended compared with car use.

Only by combining a wide range of existing and new demands over a single, direct corridor anchored by substantial trip attractors both en-route and at both ends, can a public transport service overcome these factors.

We welcome the acceptance by the promoter that the wider highway network cannot be expected to accommodate additional demands arising from development at this location, alluded to at paragraph 8.3 and elsewhere. We also applaud, in principle, the premise that transport investments should be put first into sustainable modes, rather than attempting to increase overall capacity for general traffic to accommodate demand. However this does not vitiate the fundamentally unsustainable nature of the location, greatly extending journey distances and times, and making practically impossible to consolidate demands onto an existing or potential public transport corridor, such that an attractive and relevant service can be offered and sustained in the long term.

Given the promoter's recognition that at peak the "whole network is under stress" section 8.3, it is logical and indeed a radical position that paragraph 8.17 (bullet 3) states that at peak periods, "we **need everyone** to adopt non car-based travel as that is when the network is most stressed"(our emphasis).

Such a goal, while worthy, has yet to be achieved anywhere in the UK. There is a statement that the Strategy "need(s) to actively discourage car use" (paragraph 8.14). However, despite the "need" to do so this strategy falls a very long way short of any commitment on the promoter's part to achieving this objective. Rather, the prospectus promises that "We won't limit car use for those who really want to use this mode." This evidently does not follow through. Thus there is no clear intention to restrict or reduce the convenience of car-borne mobility, except to not provide any more traffic capacity.

The secular moves to lesser car ownership referred to in the prospectus and used to justify the overarching strategy and its achievability are crude and, in fact spurious in the context of the area and the District. The contentions, while broadly true, are far from universal; they apply principally to younger demographics (without children) in large metropolitan areas. Fewer car trips are indeed being made but the same National Travel Survey data from which these assertions are drawn, makes clear that the overall mileage driven by cars is continuing to rise; reflecting much longer average trip length. This is driven precisely by extending commutes from localities that are increasingly distant from core labour markets: exactly the situation the proposals would seriously aggravate.

In relying only on existing local and wider junction and highway capacity, the strategy in fact set up any road based passenger transport solution to fail. The potentially very serious queuing issues that result will no doubt be encountered off-site, once traffic generated by the development reaches the junction of the B4066 with the A38 and, thereafter, on the approaches to the SRN. These are exactly the routes any PT solution from the site will need to use, as well as other services needed to support plan-led growth elsewhere in the District and in South Gloucestershire. If the last 40 years teaches us anything it is that in any given corridor outside major urban areas, congestion encourages a higher level of car use, not mode shift to public transport. Faced with an unreliable and extended public transport journey, trapped in the same congestion, most prospective travellers feel they are in greater control of time of departure if not arrival by driving, and are presented with a range of strategies to mitigate both usual and unpredictable delays, including reassignment of route, and

choosing an earlier or later time of departure – the driver of peak spreading. The car also offers a tailored end-to-end journey, further advantaging the driver when compared with the additional generalised journey time penalties involved in reaching the stop and walking at the end destination.

It is essential the sustainable transport offer is deliverable, relevant and effective, and achieving this is at the heart of establishing an offer that can be sustained as the basis for a longer term improvement in public transport into the future.

Despite the continuing references to a rail service towards Cam (for Bristol) and Gloucester, the development within the Plan Period to 2041 apparently relies entirely on bespoke coach services from a single stop/terminus at the mixed-use core. Notably, these services are apparently not intended to further penetrate the development area. (Overall Concept Plan p.11). This sets up the need for some substantial “last mile” trips within the development from homes on the periphery.

These bespoke coach services are intended to offer direct services to a range of destinations, but overwhelmingly the requirements are seen to be towards Bristol.

The graphic sets out the coach capacity (in number of vehicles) nominally required to each destination on the basis of a commitment to provide a seat for all forecast demand (irrespective of if it’s taken up) at section 8.3. This is assessed as being about 2000+ off-site peak hour trips, of the 4700 or so total generated, which suggests a very high degree of internalisation indeed. In early phases of the development it is inconceivable that employment and a wide range of facilities will be available within immediate reach by walking or cycling.

This strategy is predicated upon the need to demonstrate that there is no requirement to drive from the site at all at peak times, thereby obviating the need to provide for any additional highway network capacity. This is exceptionally risky. Without achieving 100% passenger transport mode share for off-site peak journeys, significant additional demands implicitly are expected to arise off-site on the wider highways network, which is already under great strain, not just in the site’s vicinity, but at least as problematic, nearer destinations such as at M5 junctions 12, 15 and 16.

We additionally dispute that the existing attribution of local travel demands from 2011 census can be crudely used to closely forecast those destinations sought by future residents (paragraph 8.4). This would be a wholly different demographic whose choice to live in this area would not well approximate to a relatively small and very stable legacy population. The relevance of the strategy focused only on a single group of destinations in and around the Bristol Northern Fringe rapidly declines if expected travel demands are more diffusely spread in space and time than they anticipate. The trip assignment model is just that.

The Phase 1 Public Transport offer is clearly focused only on bespoke peak-only tidal express coaches to Bristol. The “Zeelo model” is explicitly mentioned. Presumably this is the “smart buses” solution available at the outset (p.16 ‘car freedom’) which, in essence, is a “point to point” solution: *“quite a few of these (coaches) will be dedicated to taking people to a particular business park or common employment destination”* (para 8.9). There is no attempt to consolidate a range of demands in a single logical identifiable public transport corridor. There is therefore no synergy over space or time achievable, to generate the kinds of volumes necessary to develop and sustain a suitably frequent and relevant service pattern.

Very importantly, such synergies, especially in the context of Stroud District, would greatly serve to help achieve a substantial shift of existing car-borne traffic towards bus and coach services, helping to reduce carbon and pollution, greatly assist in socio-economic inclusion, as well as damp pressure on the network. On the contrary, the proposed model would have no positive impact on travel options within the wider locality or District, even if, by some extraordinary series of circumstances, they did in fact serve to accommodate the entirety of the trip demands from the site in the peak hour.

Section 8 also exposes some significant questions about even this operating model. For example, there is a substantial imbalance between peak outbound and inbound peak volumes. This asymmetry is of course, quite expected and reflects a number of factors affecting the timing of return journeys. To Bristol, the graphic presents a very large difference between 16 coaches capacity in the morning (or will it be, given the comments in the text?) and the 6 coaches return peak capacity. This is not merely a matter of capacity requirement. It implies business destinations that have a service provided in the morning will not offer sufficient return demand on a single departure, to justify the service being provided. This is precisely why a regular, scheduled public transport route, if it can be supported commercially by sufficient demands, ultimately represents the most economic service to provide and the most attractive and relevant one to the public, as there is no need to commit to a specific departure time. The greater the frequency, the more this can begin to compete with personal car use.

This kind of regular service, meeting a wide variety of off-site trip demands and purposes, is not what the promoters envisage at all. Rather, Zeelo is explicitly mentioned among the “likely” components of the strategy at 8.17. This is a bespoke peak-only contract management model, running and selling seats on charter coaches to a single destination, and selling typically through an app promoted by employers at the destination, which at least provides a single time and point of arrival. Data from employers gives the needed transparency on where clusters of origins exist among a large employee base sufficient to lay on a coach.

It is a new model, and a relatively newly-established business, that concentrates on quality and convenience of payment, with a strong customer service architecture, in effect aiming to replicate many of the features of Uber. To date most of the activity of the company has been focused on providing corporate shuttle coaches under contract to very large employers, where the revenue risk is either borne by the employer or, to a great extent, shared. The company was founded and until recently largely funded by the innovation arm of Jaguar Land Rover, which has been its first and largest established client, and which has a number of very large concentrations of employment that are very remote from any significant public transport offer. Zeelo is, however, unavoidably exposed to the very high fixed costs of coach charter which are still further elevated by the fact that operating assets are so poorly utilised. Most coach operators size their fleets to long-term predictable demands arising from school and college contracts. By contrast, Zeelo’s business model benefits from exceptionally low entry and exit costs, at least in its infancy, when small numbers of vehicles are required.

It must be stressed that Zeelo does not offer a scheduled bus service registered as a stage carriage service with the Traffic Commissioner under the 1985 Transport Act; rather it is an express service falling under the 1980 Transport Act, that can be initiated, altered or withdrawn with virtually no



notice. In regulatory terms, this means that it is “easy in and easy out”; but this helps mitigate against any real need to properly understand the longer-term market for any given service proposition.

The cost model means that prices are high; much higher than bus fares for scheduled bus or coach services, which benefit from spreading high fixed costs across multiple markets and achieving very high utilisation of staff and capital assets. They are not readily amenable to significant discount from regular users. To that extent the cost and tariff model resembles a taxi. Daily round-trip fares assuming near-capacity loads of 40 on a service from Sharpness to Bristol Northern Fringe destinations would need to be in excess of £8 just to break even. Sustainable service would demand both higher fares and a consistently very high load factor: something that has already proven to be highly elusive to Zeelo. The overall value proposition is challenged by the complete lack of flexibility on return times, and also the need to book.

These fundamental factors go a long way to explain why, far from “*services like these (are) running really successfully between South Wales and Bristol*” as the publication states (paragraph 8.9), the first publicly-available Zeelo service between South Wales and Bristol city centre failed within months of inception earlier in Summer 2019. There are huge challenges running and establishing bespoke services of this kind, with or without a slick digital customer interface. Several other previous attempts at scheduled commuter-coach services into Bristol Northern Fringe have failed to date, including one initiated between Weston Super Mare and BNF run by The Kings Ferry, a highly experienced operator of such services in Kent, funded for two years by North Somerset Council through the Local Sustainable Transport Fund between 2011-2013. Our own “Belles Express” from Gloucester/Quedgeley direct to the Bristol Northern Fringe again struggled to become established for a number of reasons, mainly lack of sufficient frequency and the struggle to balance demands between the key peak and off-peak destinations in Bristol.

While we believe that by consolidating development on a single, direct corridor along the A38 would demonstrably allow the kinds of operational and commercial synergies to be achieved, along with the potential for substantial bus and coach priority, to deliver a highly relevant bus/coach service/s both north towards Gloucester and south towards Bristol, from which the vast majority of other strategic allocations will derive direct benefit, and help to support, this is not true for Sharpness, nor can it be.

We note that the promoter has no intention to focus on demand from the site off-peak, except by car. As the publication states, “*We can afford to be more relaxed about how people travel outside the busiest periods*”. This exposes what really drives the strategy: not relevance to residents, or delivery of a location that offers a “credible choice in means to travel” as NPPF demands at paragraph 102, but a means to retrofit a transport solution to a location that because of its location, is unavoidably car-dependent, thus resulting in serious peak-period impacts on the highways network over a very wide geographic scale. The peak-only contract coach solution on which the promotion entirely relies, analogous to “bussing” workers in apartheid South Africa, and offering a single journey option to and from work, at best; is thus exposed as being a somewhat extreme response to an extremely ill-located promotion.

Given there will be no attempt to “gate” travel demand off-site that wishes to drive, in reality, as is exhibited all over the county and the beyond, people will continue to organise their lives to take

advantage of the overwhelming convenience of the car over any other option, in more rural areas, without a high-quality direct and frequent public transport service. Traffic volumes already are exhibiting very substantial “peak spreading” as a common and rational response to what amounts to rationing finite highways capacity by queuing. This outcome is much more likely than a high uptake of a peak contract coach service, with little or no flexibility in departure or return time, that would also be subject to exactly the same congestion as would be a car journey at the busiest periods.

#### **4. Urban design**

Both the proposed allocation footprint set out in the Draft Plan and the site context plan in the prospectus show how the proposed new town will occupy an elongated built form, running generally parallel with the Severn Estuary and extending away to the north and south from the transport hub sited at the putative rail halt. This means that the project responds less to the need to maximise the opportunities for public transport use, rail or otherwise; and rather more to other driving factors. A larger proportion of dwellings than ideal will be a significant distance from the transport hub, whether a contract coach or rail-based service is sought.

The promoters scheme for the horizon of 2041 largely sits south of the mixed use core and coach hub. A second lobe to the north consolidates development around Sharpness (Phase 1 Concept Plan).

Key structuring principles plans on page 15 show any scope for a local bus service penetrating the development areas is designed out of phase 1 except for the strategic coach route, which in effect runs immediately parallel to the rail line along the B4066 . The distances from the southern edge of the proposed development footprint to the coach hub are substantial: up to 1200m. They also visually demonstrate how the development extends away to the north west and north, with a large area immediately east of the hub in particular not proposed for development.

The generalised journey time using the coach, compared with cars, to the coach destinations will be therefore be severely compromised by extended walking or cycling trips to the hub from many trip origins within the site, even if the resident feels the arrival time and return departure time offered meet their needs. This is far from assured given the very limited choice of departures to or from the destinations sought, that could never replicate the flexibility even of a regular scheduled service running at least every 30 minutes.

#### **5. Delivery and Deliverability**

There is some divergence between what is stated in the developers’ prospectus and the language in the Draft Plan.

We note from the Draft Plan that the Council anticipates delivery starting shortly after 2025. This will be necessary to achieve 500 completions by 2030, given a ramp-up of delivery rates is pretty much unavoidable as the site is opened up with infrastructure. This is possible, but ambitious, given the timescales anticipated to plan adoption in 2021, and typical planning timescales thereafter, for submission of an immensely complex application, a suitable determination period, negotiation of s106 agreements and then discharge of conditions precedent upon commencement.

Irrespective of the sustainability or otherwise of the site, it is very well established on extensive evidence and experience, that very large developments are especially challenging and time consuming to bring forward. They then take a great deal of time to build out and achieve the levels of local services, and internalisation, on which their sustainability depends. We need not repeat references to work by a number of accepted experts in this field. We would say, though, that our extensive exposure to and proactive monitoring of development delivery across England, allows us to thoroughly endorse the veracity of this work<sup>1</sup>.

The Council's trajectory at Section 7.0 table 6 (page 197) anticipates a sustained rate of delivery of 250 dwellings per annum, which reflects the arithmetic required to achieve a 2400 unit delivery by the plan horizon. While far from unprecedented for scheme of this scale, as an extension of an existing urban area, or for a new settlement directly related to a major transport corridor or urban area<sup>2</sup> the context and overall marketability of this location, which is substantially "off the beaten track", is entirely unproven.

Even this rate of development, and evolution of demand arising from this for travel off-site is relatively sedate. To reiterate once again: there are no other existing or credibly foreseeable sources of demand in the near locality with which a combination of demands can be expected to arise, mitigating against this. Such demands as are likely to arise are expected to be split between a number of destinations, even to the south, within the West of England CA area. Thus, the site cannot take advantage from existing passing services from first occupation, much less rely on the rapid development of a deep customer base necessary to make a passenger transport offer (contract coach or otherwise) viable or attractive, by virtue of an increasing level of frequency/departure times and destinations. Indeed, by 2030, based on the trajectory and the developer's stated level of trip demand, 500 dwellings is only going to create the demand to fill a maximum of 3 40/44-seat coaches towards the Bristol, assuming a 100% coach mode share for off-site trips, itself a heroic assumption.

The costs of financially supporting just 4 contract coaches (about £400/coach round trip/diem) provided on work days only over even the Phase 1 development period from 2026/7 to 2041, nearly 15 years, will approach £5.6m. This would allow a single round trip to Gloucester, Stonehouse/Stroud and two roundtrips to specific groups of closely-related destinations in and around Bristol: hardly a lavish level of service coverage. Given how limited demand is likely to be for such an offer, we can be far from confident that a great deal of revenue could be anticipated to offset this in practice. The actual full costs of providing the full range and capacity of the contract coach service as set out in the prospectus would be greatly higher, by a multiple. However, the more likely scenario, in our view, is that should the development be consented and start to be delivered, an initial service would be trialled for a 2-3 year period, and faced with the lack of uptake and demonstrable lack of relevance and effectiveness, the developer would be likely to seek to vary the condition or terms of any obligation to remove the requirement to provide the service.

Others will no doubt comment at much more length, and with greater credibility than ourselves, on the fundamental challenges surrounding wider development costs and viability that surround a new

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<sup>1</sup> See for example *Start to Finish – How quickly do large-scale housing sites deliver* - Nov 2016, London : Lichfields and from the same source

<sup>2</sup> Kings Hill, West of Maidstone in Kent would be a good example

settlement project of this kind, on this scale, in this kind of location; that exceed virtually any other kind of scenario.

We will restrict ourselves to expressing a great concern that the project will prove to be almost impossible to bring forward within a reasonably foreseeable timescale, even assuming a very substantial central government financial support for infrastructure running into millions of pounds through such initiatives as have to date been designated as the Local Growth Fund and the Housing Infrastructure Fund. Like the majority of adopted plans that are reliant for a great portion of their delivery on very large plan-led schemes of over 2000 dwellings across England, the reality has typically been that the majority of these have stalled, or at least proven to require very longer lead times before commencement than anticipated, opening up substantial deficits in housing delivery, that require alternative sites to be identified. One needs only to look to the adjoining Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, in South Gloucestershire and at Swindon. The last named is particularly apposite where the largest allocations all have stalled, and two at Kingsdown and New Eastern Villages seem little closer to a start on site within the next 3 years of today despite many years of planning and long-confirmed allocations.