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Our Ref: SDCLP/RN **Your Ref:**

Date: 21st July 2021

Dear Sir/Madam

Stroud Local Plan Review – Pre-submission Consultation Regulation 19

Thank you for consulting Gloucestershire County Council (GCC) on the above matter. I have the following officer comments to make.

Officers have previously responded to Stroud Local Plan consultations as well as providing comments on the Local Plan modelling report. The comments provided in those previous responses remain relevant. On reviewing the Pre-submission Plan and the supporting evidence provided, officers consider it to be unsound.

Concerns remain over the transport evidence provided to support the proposed Sharpness and Whaddon allocations. Also, a number of policies are considered unsound from a Minerals and Waste Policy perspective but amendments are suggested to help Stroud District Council (SDC) overcome these concerns.

Detailed comments are set out below.

Transport/Highways Authority Comments

All of the details set out within this section are made by officers of GCC in its capacity as the Local Highway and Transport Authority

Following on from comments made to previous consultations, this response will focus on specific concerns regarding the allocations at Sharpness and Whaddon and the soundness of the evidence that is provided to support their inclusion within the emerging Local Plan.

GCC Draft plan Consultation comments can be found at:

<https://www.stroud.gov.uk/media/1164522/gloucestershire-county-council.pdf>

Strategic Site Allocation Policy- PS36 Sharpness:

GCC officers have significant concerns with regards to allocation at Sharpness and the evidence provided to justify its sustainable transport interventions and inclusion within the Plan which are set out below.

Sharpness allocation rail proposal:

In regards to the evidence provided specifically for the Sharpness allocation, GCC officers have serious doubts about the rail proposal and the likelihood of this coming forward. Even if it did come forward demand would be low as it would fail to confer convenience. Rail travel in Gloucestershire is not favoured for short trips, especially where the alternative of the private car exists. Officers have therefore commissioned SLC to review the rail proposal and Restoring Your Rail (RYR) bid and Technical Note (dated 23rd June 2021) supporting documentation. This is attached as an appendix to this response.

There are three key significant issues that indicate this proposal is unlikely to be delivered, these are cost, strategic fit/purpose and deliverable from an operational perspective.

Costs

Should this site be allocated with the transport interventions as stated and build out commences, but the cost of providing the rail solution is higher than agreed by the developer, it is unclear how this would be funded. The predicted passenger numbers are extremely optimistic (as detailed below) and there is a risk that actual numbers may be significantly lower, in line with other 'local' rail stations in Gloucestershire. This would result in the revenue assumptions not being realised and the need for the service to be subsidised. The SLC review concludes that the service is likely to be loss making.

The supporting information suggests that the rail proposal will have one million passengers per annum. This is not considered realistic, for example, four of Gloucestershire's stations have less than 200,000 passengers per annum and Stroud serves over 500,000 passengers, with direct services to London and covers a much wider catchment area and population than the Sharpness proposal. The passenger numbers will determine the level of subsidy the service requires. However, the level of subsidy for this proposal is unclear, if it is based upon one million passengers per annum and that number is not achievable, then the service will require an even bigger subsidy.

The economic case is considered weak, based on high levels of demand, considerable infrastructure investment as well as the aforementioned need for on going (potentially high) subsidy. This is likely to lead to a low Benefit Cost Ratio (BCR).

Wider Economic Considerations:

In March 2020, GCC commissioned the Gloucestershire Rail Investment Strategy (GRIS), in partnership with the six district councils and Gfirst LEP.

<https://www.gloucestershire.gov.uk/media/2096940/gloucestershire-rail-strategy.pdf>

The GRIS sets out a strategy for which service improvements will deliver most for the County's economy, backed up by evidence of resultant GVA uplift. A series of tests of enhanced train services was developed, based on an assessment of the County's development plans and the gaps in the current rail service provision to

support them. Part of the study considered testing options relating to the reopening of the freight line from Cam & Dursley to Berkeley and Sharpness. This was in response to the significant Local Plan proposal for Sharpness. The services considered were;

- 1tph Sharpness – Bristol
- 2tph Sharpness – Bristol
- 1tph Sharpness – Cam & Dursley
- 2tph Sharpness – Cam & Dursley
- 1pth Sharpness – Gloucester – Cheltenham

The GRIS showed that the level of economic uplift from each option is relatively modest and doesn't take account of the significant investment in infrastructure that would be needed to deliver these services.

The overall GRIS results showed that an enhanced regional service between Bristol and Birmingham would deliver substantial economic benefits and improve connectivity along the M5 corridor south of Gloucester, transform connectivity between Gloucester/Cheltenham and Worcester and greatly improve Gloucester's connectivity to Birmingham. This matches the priority set out in the recently adopted Local Transport Plan (LTP) 2020-2040. This is an important conclusion, particularly as the Sharpness allocation's rail proposal could negatively impact on this wider ambition.

Strategic Fit

The recently published Network Rail Bristol to Birmingham Corridor Strategic Study discusses the possibility of increased service provision between Bristol and Gloucestershire's city region as well as additional freight pathing on the corridor. The study makes no mention of potential branch-line reopening and it is unknown whether there is additional capacity for such services without impacting wider regional train service ambitions. The service would largely only benefit the Sharpness development whereas other, more regional, service ambitions have the potential to benefit a wider range of users. The Sharpness proposal in fact has the potential to damage these strategic ambitions by taking up valuable line capacity.

Strategic Purpose:

The Sharpness proposal needs to strongly evidence why this heavy rail proposal is the best approach compared to alternatives. The underlying problem that the rail solution is to address needs to be clearly identified. From the supporting documentation it appears that the heavy rail solution is to help achieve a sustainable car minimal development. This is considered high risk as it is dependent on the 'buy in' of residents to make the ambition a reality and should it fail it could result in an unviable rail service. The proposed rail service therefore only focuses to serve that location, despite the small Sharpness population, even when fully built out. The heavy rail solution therefore does not have a strategic purpose as it stands.

Operational Issues:

As stated previously the reopening of the branch line for passenger use is not in the Network Rail (NR) Bristol to Birmingham Corridor Strategic Study which could impact on line capacity and pathing as well as timetabling. Train Operating Companies (TOCs) would also need to agree to a network change and there is no guarantee that that would be possible.

There are no commitments from TOC's, NR or the Department for Transport (DfT) to reopen this branch to passenger traffic which has the possibility of creating delivery issues further in the planning process.

Even if the ambitions in the NR study for additional services should not be delivered, the Sharpness rail proposal for the Sharpness – Gloucester service would still introduce conflict points, particularly with northbound services. The conflict moves would be where the service meets the mainline near Gloucester and when the service crosses the mainline to traverse the Sharpness branch-line. This adds additional complexity and performance risks to other services.

NR and the DfT will need to be convinced that the substantial modal shift is possible and that it is possible to include the proposal alongside other additional services on the Bristol to Birmingham corridor as set out in the recent NR Study.

Express Coach

The Sharpness allocation has proposed a Zeelo express coach model as stated in the Mobility as a Service (Maas) & Express Coach services document. The service configuration will see the coach service travel to destinations of most demand, directly and quickly making the journeys comparable to the car as stated in the supporting document. Appendix B of the MaaS and Express Coach document provides some information from Zeelo including a proposed route with stops at Aztec West, Rolls Royce, Airbus, M.O.D, UWE and central Bristol.

The information suggests a journey time of 35 minutes approximately. However, reviewing route journey planners this journey could take 1 hour 4 minutes following road alignments and assuming the stops are located directly at these destinations. A journey time of 45 minutes is suggested if the stops are located on primary routes somewhere in proximity to the destinations with a walk, cycle or other MaaS method required to finish the journey.

However, this has not considered whether it is possible, practical or safe to stop in these approximate locations but has been reviewed for the journey time comparison only. A direct journey from Sharpness to central Bristol is 41 minutes, whereas it is unclear whether the '35 minute' Zeelo route has considered stop, wait and/or alighting times at the destinations which would increase journey times. Therefore it is unclear how the approx. 35 minute journey time has been calculated. Furthermore, officer journey time reviews have been undertaken with no traffic. Peak times are likely to result in significantly longer journey times due to higher traffic flows. Officers do not believe that the journey times are comparable and this will do little to persuade users to shift modes from private car use.

Furthermore, the overall journey time has not considered walk/cycle times at origin and destination. The peripheral areas of the allocation are quite some distance away from the proposed coach pick ups which questions the practicality of such service for most users and whether it is a practical alternative method.

The service appears not to be entirely flexible, with set destinations and timing of service. The technical note states that if users miss the express coach service the opportunities for MaaS will ensure they have travel options. Furthermore, the MaaS and express coach document has stated high levels of demand/users switching to the Zeelo services. Given the limited departure/arrival times, this level of mode share looks unrealistic. The location of the site itself questions the level of mode share as it is not located on any strategic transport corridor unlike other proposed developments in the plan.

The mode share modelling provided in the MaaS and express coach document appears to align to a best case scenario where by residents embrace the transport offer, whereas no evidence to the contrary is provided.

This proposal suggests the development needs to be inhabited by like minded individuals who are willing to embrace this new method. This is considered unlikely in reality. The service also serves little strategic purpose other than to benefit the residents of Sharpness. GCC have ambitions to utilise the major transport corridors for high frequency bus services, linking with major transport hubs and railway stations, that can target a much wider population, as outlined in the Local Transport Plan 2020-2040. Sharpness' remote location will not benefit from the potential connectivity arising from GCC's strategic ambition and is therefore unlikely to realise a coach mode share that supports a sustainable pattern of development.

Furthermore, Section 3.8 'Option Assessment' of the RYR – Sharpness Branch line technical note recognises that a bus based solution would have unattractive journey times when considering acceptability. This does not provide confidence that bus/coach based solution would be successful.

General Comments:

The express coach and rail interventions are high risk, high cost proposals which may not generate sufficient demand to make them deliverable/viable, particularly if the residents do not buy into the vision for the development. There is also conflict with the ambitions of the development which focuses strongly on internalisation, which could conflict with the proposed numbers using the coach/rail proposals and possibly impacting on long term viability. Officers, therefore question the long term success of these methods in this location.

The site allocation is remote and a significant distance away from major transport corridors such as the A38, M5 and mainline railway. It is also landlocked to its west. This will inevitably impact on journey times to key destinations.

This leaves officers concerned that the intervention schemes may not be delivered but housing/employment may receive consent or have work commenced, leaving the site not just unsustainable, but less sustainable than other existing and proposed developments in Stroud District and Gloucestershire. It is GCC officer's view that the

assumptions used are overly ambitious and are not reflective of typical transport demand in Gloucestershire in relation to travel demand.

Therefore, officers have concluded that the evidence for this allocation is not sound. The development is unsustainable when considered against the policies outlined in both the NPPF and Stroud District Local Plan. The transport measures proposed are not considered viable or deliverable, and the future residents are expected to behave in a way that is not evidenced in any other location with similar, dislocated attributes, both geographically and in terms of transport opportunities.

Strategic Site Allocation Policy G2 - Land at Whaddon

Previous officer comments of concern relating to the Gloucester fringe site at Whaddon remain. The peripheral location needs consideration as to how sustainable transport interventions can be provided within the site allocation, but then integrated seamlessly into the existing built environment. Overcoming the severance caused by the railway is critical to this and further consideration is needed in regards to additional crossing points for walk, cycle and public transport. Previous comments have suggested routes adjacent to Daniel's Brook and Buckenham Walk. No supporting information has been provided to evidence that these issues have been addressed.

This site needs to heavily promote low traffic neighbourhoods as a means of encouraging cycling and walking for short journeys. Increased permeability for those trips into the existing built environment will also help integrate the site into Gloucester and provide access to wider local centres and employment. The public transport offer has to be realistic and comparable if not better than the car in terms of journey times and availability.

The highway impact also remains a significant concern. St Barnabas roundabout is identified as needing additional capacity to cater for the additional car traffic generated by the site allocation, but the specific impacts of this development site are unknown therefore it is difficult to determine what intervention is appropriate and whether that mitigation would have adverse environmental impacts. Furthermore, improving St Barnabas may have knock on impacts elsewhere along the A38 corridor and this issue needs to be understood, particularly as interventions are likely to be costly. The interventions should also include public transport consideration as well as walk/cycle accessibility in line with Cycle Infrastructure Design (LTN 1/20). To accommodate these users and provide a suitable junction with sufficient capacity will be difficult within the existing footprint of the roundabout. There will be implications for land take at this location and the impact it will have on site delivery. These are issues that are currently not addressed and are important concerns for officers.

Furthermore, the current traffic modelling exercises provide a cumulative effect assessment, evaluating the overall traffic impact of all Local Plan allocations within the study area. It does not identify which of the potential sites within proximity to key Strategic/Major/Local Road Networks junctions has the greatest impact upon them. M5 Junction 12 has been identified in the Local Plan Modelling as requiring enhanced intervention which is likely to result in significant costs in order to deliver. Whaddon is highly likely to have significant impacts on M5 Junction 12, but without site specific modelling evidence it is difficult to determine the extent of this impact.

Therefore officers consider that insufficient evidence has been provided to support this proposed allocation.

The site has challenging sustainable accessibility issues, potentially leaving future residents dislocated and separated from Gloucester City both geographically and in terms of transport opportunities. The evidence currently available for this proposal does not make it clear how the site could meet the sustainability requirements of the NPPF and Stroud District Local Plan. The highway impacts arising from the allocation and mitigation required have not been provided in sufficient detail, raising concerns over their viability, deliverability and impacts on the wider network. The underlying principles of any development in this area needs to articulate a vision for how new neighbourhoods will be created; how new residents will travel and meet their needs, and how internalisation of trips might mitigate the need for transport interventions on the principal road network and the impact of those interventions.

Minerals and Waste Policy Comments

All of the details set out within this section are made by officers of GCC in its capacity as the local Mineral and Waste Planning Authority (MWPA).

The Stroud District Local Plan Review has now reached the Pre-Submission (Regulation 19) plan-making stage. Consequently, the comments made by M&W policy officers relate to one or more of the three matters that will be assessed through examination and will largely determine whether the plan can move to adoption – legal compliance; soundness; and the duty-to-co-operate. For ease of consideration sub-headings have been used to identify the elements of the plan that have demanded a representation by officers of the MWPA:-

Core Policy CP11 - New employment development

Officers of the MWPA do not consider the pre-submission version of Core Policy CP11 to be sound as it is not clear whether future proposals for waste management-related infrastructure could be afforded local policy support? National policy as set out under the National Planning Policy for Waste (NPPW) advises that priority for new or enhanced waste management facilities should be given to sites identified for employment uses alongside a number of other land-use types.

However, officers of the MWPA would support to Core Policy CP11 going forward if a modification was made either through an additional bullet point; or slightly expanded text to bullet points 5 or 6; and / or a revision to the supporting text under paragraph 5.2. Confirmation is required that future proposals for waste management-related infrastructure might reasonably be considered alongside traditional employment land use categories of business use, general industrial use and storage / distribution use and “Sui Generis” industrial uses, tourism, retailing, health care, education and leisure facilities.

Delivery Policy EI2 - Regenerating existing employment sites

Officers of the MWPA do not consider the pre-submission version of Delivery Policy EI2 to be sound as it does not acknowledge the potential risk posed to the safeguarding of waste management facilities. This is an issue responded to by national policy within the NPPW. Waste management site safeguarding is also a

well-established local policy as set out in the adopted Gloucestershire Waste Core Strategy (WCS) under Core Policy WCS11 - Safeguarding Sites for Waste Management. Failure to accommodate this matter could also bring into question the duty to cooperate by way of undermining the MWPA's attempt to facilitate and support an efficient and effective countywide network of waste management facilities.

Nevertheless, officers of the MWPA would support to Delivery Policy EI2 going forward if a modification was made (mostly obviously to the supporting text under paragraph 5.24). The modification should clearly articulate that regenerative development at existing employment sites would need to ensure that potential adverse impacts on existing waste management facilities, permitted sites, and areas allocated for future waste management-related uses would not occur. Regenerative development that could generate incompatible land-uses should be avoided or accompanied by sufficient mitigation that will prevent prejudicing the efficient operations of waste management-related facilities and their ability to effectively implement the waste hierarchy.

Delivery Policy EI2a - Former Berkeley Power Station

Officers of the MWPA do not consider the pre-submission version of Delivery Policy EI2a to be sound as it is not clear whether waste management-related infrastructure uses could be afforded local policy support. National policy as set out under the NPPW advises that priority for new or enhanced waste management facilities should be given to sites identified for employment uses alongside a number of other land-use types.

However, officers of the MWPA would support policy EI2a going forward if a modification was made to the supporting text under paragraph 5.27. Waste management-related infrastructure should be added to the list of employment uses that may be supported.

Delivery Policy EI5 - Farm and forestry enterprise diversification

Officers of the MWPA do not consider the pre-submission version of Delivery Policy EI5 to be sound as it is not clear whether waste management-related infrastructure uses could be afforded local policy support. National policy as set out under the NPPW advises that priority for new or enhanced waste management facilities should be given to redundant agricultural and forestry buildings and their curtilages alongside a number of other land-use types.

However, officers of the MWPA would support Delivery Policy EI5 going forward if a modification was made to the third sentence of paragraph 5.30. Waste management-related infrastructure should be added to the list of potential uses identified.

Employment Allocation Policy PS43 - Javelin Park

Officers of the MWPA support the pre-submission version of Employment Allocation Policy PS43 as it clearly acknowledges waste management safeguarding requirements associated with the adjacent Javelin Park Energy from Waste (EfW) facility.

Strategic Site Allocation Policy PS34 - Sharpness Docks

Officers of the MWPA do not consider the pre-submission version of Strategic Site Allocation Policy PS34 to be sound. The policy and supporting text fails to acknowledge the need to safeguard mineral and waste management infrastructure that is present at Sharpness Docks. Safeguarding of mineral infrastructure is a matter responded to by the NPPF and the requirement to safeguard waste management facilities is set out in the NPPW. Furthermore, at the local-level mineral and waste safeguarding is an established part of the local development plan under adopted Minerals Local Plan for Gloucestershire Policy MS02 - Safeguarding mineral infrastructure and Core Policy WCS11 - Safeguarding Sites for Waste Management of the adopted Gloucestershire Waste Core Strategy (WCS). In addition, both spatial planning matters have been included on the county's Minerals and Waste Policies Map. The failure to accommodate this policy provision brings into question the duty to cooperate by way of undermining the local MWPA's attempt to facilitate and support efficient and effective countywide networks of mineral and waste management infrastructure.

However, officers of the MWPA would support Strategic Site Allocation Policy PS34 going forward if modifications were made. The 'Planning constraints and designations' set out on page 169 should include the presence of minerals and waste infrastructure and the need to ensure their efficient and effective operations will not be compromised by new development. This constraint should also be accommodated in the main policy text – under part a. A requirement should be added that will ensure future dock uses and dock-related industrial and distribution uses will not prejudice the efficient and effective operations of safeguarded minerals and waste infrastructure.

Strategic Site Allocation Policy G2 - Land at Whaddon

Officers of the MWPA do not consider the pre-submission version of Strategic Site Allocation Policy G2 to be sound. The policy and supporting text fails to reference the presence across part of the allocation of underlying sand and gravel mineral resources that are of potential economic importance. National policy on mineral resource safeguarding is contained within in the NPPF and has been further interpreted locally through the adopted Minerals Local Plan for Gloucestershire Policy MS01 - Non-mineral developments within MSAs. The overarching policy aim is to ensure valuable mineral resources are not needlessly sterilised by surface development. The county's Minerals and Waste Policies Map shows that a reasonable proportion of the south-western part of the allocation is within a designated Mineral Safeguarding Area (MSA).

Nevertheless, officers of the MWPA would support Strategic Site Allocation Policy G2 going forward if modifications were made. The 'sensitivity, constraints and designations' set out on page 155 should include the fact that part of the allocation falls within a designated Mineral Safeguarding Area (MSA). In addition, the text for Strategic Site Allocation Policy G2 should include a further bullet requiring any future development brief to...:- determine through an initial Mineral Resource Assessment (MRA), the significance of the underlying mineral resources present within the designated MSA and the extent to which any mitigation measures will be necessary to avoid sterilisation by surface development and / or whether a strategy for the prior

extraction of the mineral will be required for any future development proposals covering the relevant area of allocation G2.

Strategic Site Allocation Policy PS20 - Stonehouse - Eco Park M5 Junction 13

Officers of the MWPA do not consider the pre-submission version of Strategic Site Allocation Policy PS20 to be sound. The policy and supporting text fails to reference the presence across part of the allocation of underlying sand and gravel mineral resources that are of potential economic importance. National policy on mineral resource safeguarding is contained within in the NPPF and has been further interpreted locally through the adopted Minerals Local Plan for Gloucestershire Policy MS01 - Non-mineral developments within MSAs. The overarching policy aim is to ensure valuable mineral resources are not needlessly sterilised by surface development. The county's Minerals and Waste Policies Map shows that a proportion of the north-western and southern parts of the allocation and near to the site boundary with the A419 fall within designated Mineral Safeguarding Areas (MSAs).

Nevertheless, officers of the MWPA would support Strategic Site Allocation Policy PS20 going forward if modifications were made. The 'planning constraints and designations' set out on page 105 should include the fact that part of the allocation falls within designated Mineral Safeguarding Areas (MSAs). In addition, the text for Strategic Site Allocation Policy PS20 should include a further bullet requiring any future development brief to...:- determine through an initial Mineral Resource Assessment (MRA), the significance of the underlying mineral resources present within the designated MSAs and the extent to which any mitigation measures will be necessary to avoid sterilisation by surface development and / or whether a strategy for the prior extraction of the mineral will be required for any future development proposals covering the relevant areas of allocation PS20.

Ecology (biodiversity) Comments

Firstly on a matter of a small but important detail the various headers on each page of the HRA report do not correctly refer to the Pre-submission version of the Stroud Local Plan and need correcting.

Despite significant challenges of mitigating the effects of new development allocation upon national and internationally designated sites and upon wider biodiversity the policy approach and associated SEA/HRA processes have produced an acceptable pre-submission version of the Local Plan. From an ecological (biodiversity) perspective there are no obvious issues to raise regarding legal compliance, soundness or duty to co-operate including with our own authority. We note the Local Plan makes good provision for the forthcoming changes due if the Environment Bill currently before Parliament receives Royal Assent.

Conclusion

Sharpness and Whaddon are substantial allocations in the Plan and are clearly an important component of the development strategy for the District as a whole. Given the transport concerns raised above regarding these two sites, based on the available submitted transport evidence, GCC consider the Plan to be unsound.

Also, with regard to the Minerals and Waste comments, if the suggested policy amendments are not agreed then the Plan will be considered unsound on this basis as well.

If you would like to discuss any of the points raised above please do not hesitate to contact me.

Yours faithfully

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Appendix A – Sharpness Vale Statement of Opinion is attached separately