
Stroud District Local Plan Review Pre-Submission Draft Plan (May 2021)

Representations by Savills on behalf of L&Q
Estates

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Appendix 1 - Highway Note

Introduction

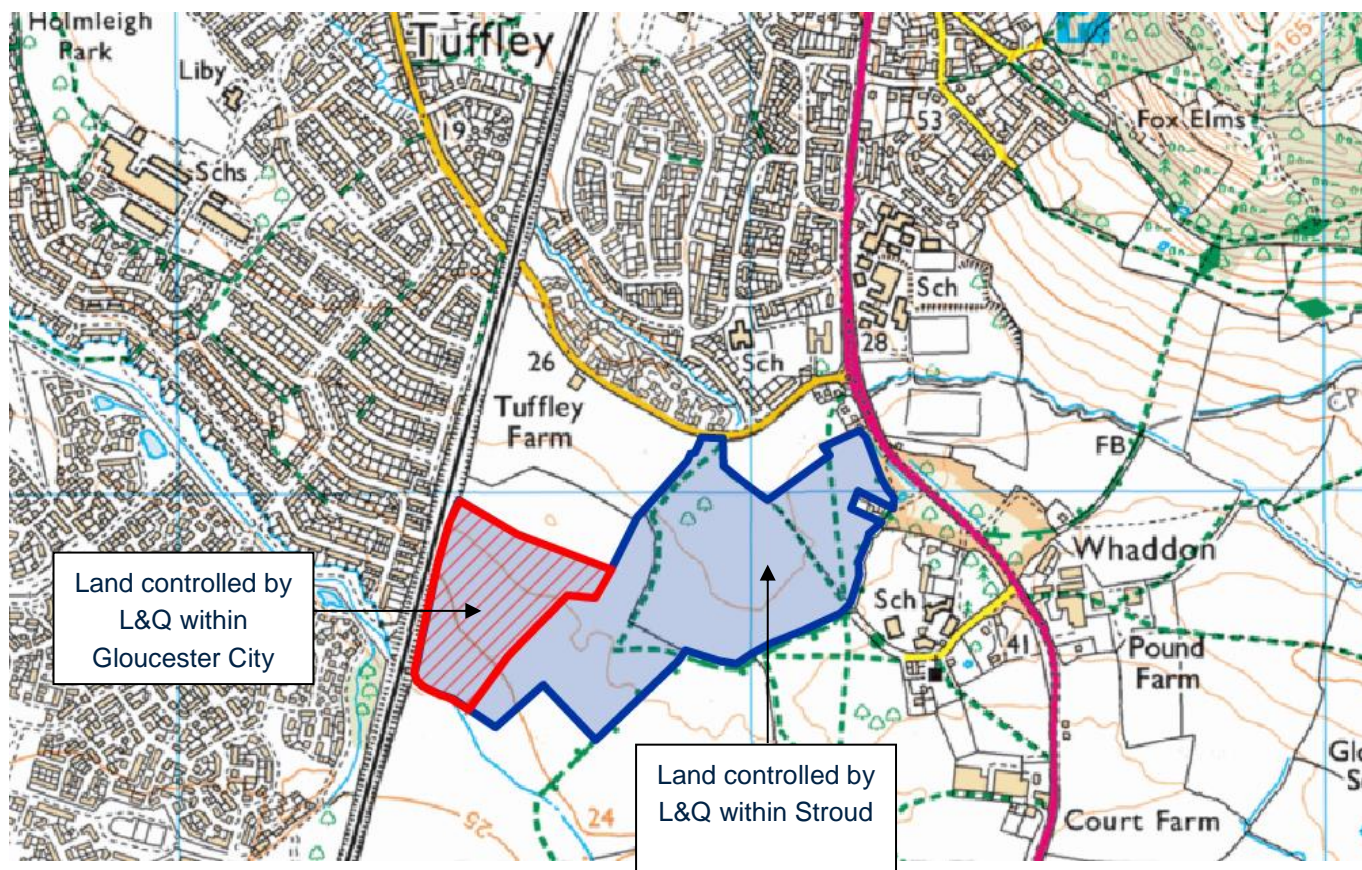
L&E Estates

These representations are submitted by Savills on behalf of L&Q Estates. L&Q Estates is one of the UK's largest, most successful, strategic land development companies with over 40 years' experience in promoting and developing high quality residential, commercial, retail and mixed-use schemes throughout the UK.

L&Q was founded in 1963 by a group of 32 people who had a vision of ending homelessness. With an initial investment of £32 in 1963, the charity is now recognised as one of the most dynamic, forward thinking housing organisation in the UK. L&Q Estates is the strategic land business of the London & Quadrant Group (L&Q).

L&Q Estates (L&QE) has an interest in land to the South of Gloucester, between the railway line to the west and Stroud Road to the east (see Figure 1 below).

Figure 1 – Site Plan



The figure above shows the overall extent of the land promoted by L&QE. Approximately 6 hectares fall within the Gloucester City administrative area and a further 17.3 hectares are within Stroud District Council (SDC). It is anticipated that the total capacity would be in the region of 500 dwellings (of which circa 375 dwellings would be within Gloucester City). The land within SDC is identified in the Pre-Submission Plan (from here on referred to as the 'Plan') as part of a larger area known as 'Land at Whaddon' (G2).

The Local Plan Review

The production of an effective, deliverable and positively prepared Local Plan will not only provide a solid foundation for tackling the increased housing requirement but it will also ensure a planned and coordinated delivery of development alongside the necessary supporting infrastructure. This is only achievable if the Local Plan submitted for examination is sound. Consistent with the National Planning Policy Framework (the "Framework") (February 2019), to be sound, the Local Plan must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

In addition to satisfying these 'tests of soundness', there are a number of legal obligations placed upon the authorities which govern the plan-making process. Of particular relevance to the content of the Local Plan are the provisions of paragraph 39(2) of the Planning and Compulsory Purchase Act 2004 (the "2004 Act"), which requires that, in plan-making, local planning authorities "*must exercise the function with the objective of contributing to the achievement of sustainable development*".



1. Housing Need and Supply

1.1 The development strategy aims to deliver at least 12,600 additional dwellings and 76ha of new employment land over the next 20 year period (2020-2040) – draft Core Policy CP2.

Housing Need

1.2 The Pre-Submission Plan indicates that the housing requirement is based upon the current Local Housing Need (LHN) figure – of 630 dwellings per annum (dpa) for Stroud, as set out in the Gloucestershire Local Housing Needs Assessment (LHNA) (ORS, September 2020).

1.3 The LHNA actually identifies a LHN figure for Stroud at 638dpa (Figure 1). This is a ‘capped’ figure – with the uncapped LHN housing need at 652dpa – with the figure used in the Pre-Submission Plan capped at no more than a 40% uplift on the adopted Local Plan.

1.4 However, as identified in the LHNA (at paragraph 8), the Stroud Local Plan is now more than 5 years old, and as such, the cap is whichever is highest of 40% of the projected household growth from step 1, or the local plan requirement. The projected household growth is higher than the local plan requirement (at 491), and as a result the capped figure used in the Pre-Submission Plan does not comply with the LHN methodology (2a-004-20201216).

Plan Period	Capped	Current LHN
Annual LHN	638	652
Local Plan Housing Target	12,760	13,040

1.5 According to the LHNA, the minimum housing requirement for Stroud is therefore 13,040 dwellings over the 20 year plan period. Whilst this is a relatively modest increase it is nevertheless important for the plan to accurately reflect Government policy and guidance.

1.6 As expressed within the PPG, the LHN represents the minimum housing requirement, and it is necessary to consider whether the actual housing need is higher; taking account of local circumstances. The PPG explains that local circumstances can include economic growth forecasts, historical rates of delivery and the need for affordable homes (2a-010-20201216 and 2a-024-20190220).

- 1.7 The rates of historical delivery for Stroud have been higher than the adopted housing requirement (of 456dpa) for a number of years; with the last three years with completions of 662, 564 and 497dpa. Indeed, of the last 7 years, housing completions have only fallen below 456dpa in two years – indicating that the adopted Local Plan significantly underestimates the local housing need within the District.
- 1.8 In regard to economic growth, the Authority’s housing strategy does not align with the economic growth policy. The LHNA considers the potential requirement for an adjustment to the housing requirement based upon three job growth scenarios – all of which are below the job growth figures given in the Pre-Submission Local Plan of 7,740 to 10,440 net new jobs (paragraph 2.6.2).
- 1.9 Indeed, the LHNA concludes that there is an alignment between future jobs and workers, and that the resident population will fill the jobs, with no change in the commuting ratios (paragraph 9). However:
- a. the economic strategy in the Pre-Submission Local Plan expressly Advocates a higher job growth target of between 7,740 and 10,440 jobs (net) – compared to the figures of -1,839, +2,330 and +6,288 considered in the three job growth scenarios of the LHNA (Figure 19);
 - b. The higher job growth target is predicated on an inward investment strategy seeking in-migration into the District, and retaining the existing younger population (paragraph 2.6.6);
 - c. The employment land requirement set out in the Pre-Submission Plan reflects the higher job growth scenarios as expressed in the Gloucestershire Economic Needs Assessment (GENA) (2020); and
 - d. The higher job growth scenario (at 10,440 net new jobs) reflects the Local Enterprise Partnership’s Local Industrial Strategy (paragraph 11.41, GENA), which as per paragraph 81 (NPPF), planning policies should positively address.
- 1.10 The LHNA considers the need for affordable housing in the district. It identifies a suggested affordable housing target need of 3,291 units over the plan period (Figure 62). However, this significantly underestimates the absolute level of affordable housing need within the district. It continues to place reliance on housing benefit and the private rented sector, and doesn’t include the full extent of the requirement for Affordable Homes for Ownership. Notwithstanding this, the Authority’s evidence base (discussed further below) indicates that there are substantial barriers to the delivery of even the lower affordable housing need figure.

- 1.11 In accordance with the PPG, it is necessary to consider whether the actual housing need is higher, and whether an uplift to the LHN is required to align with the economic strategy and the wider affordability issues. At present, it is not considered that the housing requirement is positively prepared, or consistent with national policy.

Housing Supply

- 1.12 We have not come across a detailed housing trajectory within the evidence base supporting the new Local Plan, and this will need to be provided prior to the Examination.
- 1.13 Page 306 of the Pre-Submission Plan includes a summary of the sources of supply from the proposed strategic sites. The projected delivery of the strategic sites will require robust evidence. In our experience, with the local plan anticipated adoption in Winter 2022 (p1) and a delivery mechanism requiring subsequent Development Briefs for the strategic sites (set out in the individual policies and at paragraph 7.2); the potential need for CPO to deliver some of the sites (see paragraph 7.3 of the Plan); and the extent of infrastructure required on others, the assumption that six of these sites will have housing completions by April 2025 is not considered robust.
- 1.14 Indeed, the recent Lichfield's Start to Finish (February 2020) research concluded that on sites of more than 500 dwellings it took between 5 - 8.4 years for the first completion *from the date at which the outline planning application is validated*.
- 1.15 In regard to the two proposed new settlements, there is no pre-existing infrastructure which can support the early stages of delivery, and the need for significant upfront infrastructure is likely to significantly slow the lead-in time (notwithstanding the concerns in regard to viability raised below). The position that one of these, Wisloe, will deliver housing completions by 2025 and Sharpness shortly after, is therefore considered unrealistic in practice.
- 1.16 In addition to considering the appropriate lead-in times, further evidence must be provided to support the proposed build out rates. For example, how many outlets are assumed per site, when will these come online, and how many dwellings is each anticipated to deliver per annum. Evidence from examples should be used – for example, the delivery rates at existing strategic sites in the district at Hunts Grove and West of Stonehouse, and also references drawn from national evidence.
- 1.17 It is not possible to comment on the Authority's assumptions, as this information has not been published; however, at the outset we raise a concern in regard to the apparent assumption that Sharpness will deliver 230dpa in the latter part of plan period.

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- 1.18 The NPPF, at paragraph 72, requires clear evidence on the lead-in times, and realistic delivery rates to support any proposals for a new community. At present, this information is lacking, and on the basis of the information provided at p306, it is clear that the assumptions underpinning the scale of development considered deliverable over the plan period are not appropriate.

2. Development Strategy

2.1 The Development Strategy/Spatial Strategy for the district is covered in numerous locations across the Pre-Submission Plan. For ease, we provide a comprehensive response in regard to the strategy set out in the consultation document as a whole, rather than providing repetitive commentary on duplicated parts of the plan.

2.2 At the outset, we note our in-principle position – that the proposed Development Strategy does not accord with national planning policy in regard to the delivery of sustainable development, nor with the issues, vision or objectives expressed within the plan itself; and fundamentally, that it is not deliverable.

Delivering Sustainable Development

2.3 One of the priority issues on page 11 of the Draft Plan is to concentrate *“housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure”*. Key Issue 18 similarly seeks to improve the sustainability of the transport system to help reduce CO² emissions *“with an emphasis on limiting car use by extending the cycling and walking network and making improvements to public transport”*.

2.4 These are entirely logical and sound objectives and consistent with the overarching principles of the Framework (in particular paragraph 103). In essence, this priority of the plan is explicitly supporting geographical sustainability and emphasising the importance of locating development where sustainable travel opportunities exist to meet the needs of future residents. This position is taken forward into the plan and enshrined in policies, for example DCP1. As recognised at paragraph 2.9.6 of the plan, CO² emissions from transport continue to rise both locally and nationally. Establishing a spatial strategy which prioritises future development at locations where travel options exist is crucial if the Authority is to achieve its climate change objectives.

2.5 However, the subsequent Development Strategy set out in the Pre-Submission Plan does not follow these priorities, nor indeed the policy direction given in the Framework.

2.6 The Sustainability Appraisal (SA) process underpins the local plan preparation, alongside discharging the legal requirement for a Strategic Environmental Assessment. The most recent iteration of the SA (May 2021) has been used as the basis for this assessment. We note that there is an Updated SA Summary Matrix of Strategic Sites (March 2021) which is described as a working draft, however, its matrix of the strategic sites does not accord with the subsequent conclusions set out in Appendix 7 of the May 2021 SA, and as such, we have not reviewed it further.



- 2.7 In previous representations, we have raised an objection to the failure to consider Land at Whaddon (Site G2) as a reasonable alternative to meet the housing needs of Stroud itself, and further that the Development Strategy was seeking to allocate development on less sustainable, and deliverable, sites.
- 2.8 Whilst it is recognised that the site is subject to an allocation as a safeguarded site to meet Gloucester’s needs, there is no justification for this site being reserved for this future potential identification while other less sustainable locations within Stroud, and in the same housing market area, are allocated.
- 2.9 Whilst we support the Authority’s recognition that there may be a need in the future to assist Gloucester City to meet its unmet housing needs; it is illogical to hold back the most sustainable development site within the plan area achieve this objective simply because it is located closest to Gloucester. In the event that Gloucester City identifies an unmet housing need, it should be the next most sustainable location within Stroud District which is identified to meet that need after those which are allocated to meet the needs of Stroud and irrespective of the location within the District.
- 2.10 As a Development Strategy, that would ensure that the most sustainable locations for development are definitely allocated. In practice the new homes would be taken up by those households depending upon which location best suits their requirements as all locations within Stroud fall within the same broad functioning housing market area.
- 2.11 Within the SA (p973) it is confirmed that Whaddon was considered a suitable and available site for the scale and type of development set out in the Emerging Strategy, and identified as a reasonable alternative for the purposes of the SA. The SA then goes on to confirm that the Draft Plan identified the site as a location to meet the future needs of Gloucester City. The justification given under the Pre-Submission Plan section indicates that the *“site is not associated with any established Stroud settlement set out within the settlement hierarchy and is a poor fit with the development strategy for Stroud District. However, the site relates well to the urban edge of Gloucester and this site offers the potential to contribute to Gloucester City’s housing needs at a location which maximises the potential for residents to use active travel and public transport to access jobs, services and facilities.”*
- 2.12 This justification fails to acknowledge the wider context of Stroud District, its position in the housing market area, and is not supported by the evidence base, or the Pre-Submission Plan itself. It is also internally inconsistent as the Plan also identifies two sites within the Gloucester Fringes (Policy G1 and PS30) to meet Stroud’s housing needs – implying that there is no in-principle conflict with the spatial strategy in this respect. There is no justification as to why these two sites were chosen over Whaddon to meet Stroud’s own housing needs.



- 2.13 Notwithstanding this, plan-making is not undertaken in a silo. The fact that the site is better related to the City of Gloucester, as opposed to any individual settlement within Stroud itself, does not render it an unsustainable or unsuitable location for development; and certainly does not justify why it hasn't been considered as a reasonable alternative within the SA. Indeed, the text (supported by the wider evidence base discussed below) emphasises the significant sustainability benefits associated with this site in regard to access to active travel and public transport to jobs, services and facilities.
- 2.14 In contrast, the Development Strategy identifies two new communities (at Sharpness – PS36 and Wisloe – PS37) to meet the housing needs of Stroud. This cannot be described as the most appropriate strategy taking into account both the legal and policy requirement to promote sustainable development.
- 2.15 The justification for the selection of Sharpness and Wisloe given within their respective sections of Appendix 9 of the SA is that they accord with the Development Strategy – a strategy which includes the identification of two new communities in Sharpness and Wisloe. It is thus a circular argument, and no other site could be identified as a reasonable alternative.
- 2.16 We do recognise that new Garden Communities *can* provide a suitable option to deliver large scale development but only where they are sustainably located and capable of delivering the infrastructure required to support the needs of the new residents. We have significant concerns with the proposed new communities.
- 2.17 We expand upon the reason for these objections to Sharpness below; however, fundamentally the location is not capable of delivering a sustainable new community – both in principle due to its location, and further in regard to the deliverability of the infrastructure crucial to the Authority's justification for its allocation and the sustainability of the community (in regard to access to services and facilities, maximising sustainable travel and the delivery of employment development).
- 2.18 This is emphasized when considering the transport evidence base supporting the Pre-Submission Plan. We include commentary from our transport consultation in Appendix 1. In summary this concludes that there does not appear to have been any preliminary assessment of the sustainability merits of the strategic sites in respect to sustainable travel nor indeed the application of the sustainable travel hierarchy – given this is such a fundamental aspect of the NPPF, and the priorities of the local plan itself, this is of concern. Indeed, the appended Note concludes that the evidence base essentially assumes the delivery of Sharpness and Wisloe, and then identifies sustainable travel interventions for the sites in regard to infrastructure.



- 2.19 It fails to take a preliminary approach of understanding where the main opportunities to feasibly deliver sustainable growth should be located, and subsequently to apply the hierarchy approach of 1. negating the need to travel, 2. minimising travel 3. prioritising active travel and then establishing commercially viable public transport to key destinations. It also doesn't comment on the actual deliverability of the infrastructure which it is identifying – noting the requirement for large scale infrastructure schemes, particularly where this relates to securing external funds, to demonstrate a cost benefit. Indeed, the scale of infrastructure required for the new settlements, notwithstanding that in particular regard to Sharpness, that this would make no demonstrable impact on modal shift to sustainable travel choices, is not considered deliverable.
- 2.20 The evidence base is not robust, and doesn't objectively consider the sites. For example, it assumes the new communities, which are located beyond reasonable walking distance of any significant employment and services, and by their nature of being 'Garden Villages' deliver fairly limited services and facilities (comparably less than the existing towns within Stroud, and Gloucester to the north); would deliver a higher mode shift uptake to walking than an urban fringe site which already benefits from access to existing employment, services and facilities. The mode shift figures must be realistic and robust, and should be set based on a specific assessment of each of the strategic sites, taking into account travel demand to each key destination and realistic levels of mode split uptake.
- 2.21 This is in contrast to Land at Whaddon, where the location is already demonstrably sustainable, and has access to significant employment, services and facilities via walking, cycling and sustainable travel choices by virtue of its location on the edge of a City. Whilst there are opportunities to further enhance this infrastructure in tandem with development, there is no initial fundamental barrier to maximising sustainable travel choices.
- 2.22 We have further concerns in regard to Wisloe – in particular, it does not appear that all of the land is available (recognising that the Authority are assuming delivery within the five year period (before 2025 – p306¹)); with some of the land within the allocation boundary not forming part of the evidence submitted by the promoters.
- 2.23 Further, the Landscape Visual Analysis and Strategy Plan (promoters evidence) doesn't accord with the noise constraints identified in the Environmental Noise Assessment (promoters evidence) – with the combination of noise from the railway, M5, A38, A4135 and the employment uses located in the centre of the site. The Noise Assessment indicates that even with mitigation, there are areas

¹ Notably, the promoters' website for the site indicates that the planning application would be consulted upon in 2023/24 – indicating that first delivery before 2025 would not be possible - <https://wisloe.co.uk/index.php?contentid=15>.



of the site which would not be suitable for residential development (including as external amenity space); however these areas are then subsequently included within the general area for development in the Allocation Plan. There are further constraints identified within the evidence base which have not been addressed – including the very high potential for a romano-british settlement, and potential requirement for extensive ecological mitigation, including bat corridors and addressing wintering birds.

- 2.24 Given the potential that not all of the land is available for development, and further that there are constraints which are unable to be overcome through design/mitigation which restrict further the extent of developable area, it is not clear whether the scale of development being sought in the draft allocation is deliverable on the site; and, in the event that a smaller scale of development is achievable in practice, whether this would fundamentally undermine the sustainability merits of the site – in respect to the range of services which may be delivered on site, the site viability, and the financial contributions available for offsite infrastructure works including those necessary to facilitate sustainable travel.
- 2.25 The Development Strategy does not accord with national planning policy, or indeed the overriding objectives of the local plan itself. Sharpness is demonstrably undeliverable, and there are concerns in regard to Wisloe that have yet to be addressed.
- 2.26 Land at Whaddon represents a more sustainable development site, and indeed, aligns with national and local policy, guidance and aspirations to maximise sustainable travel, and as a result reduce carbon emissions.

Draft Site Allocation PS36 – New Settlement at Sharpness

- 2.27 The New Community at Sharpness is proposed for allocation under Policy PS36 of the Draft Plan. By the end of the plan period it has been assumed that the development will have delivered 2,400 of a potential 5,000 dwellings alongside supporting infrastructure. This represents circa 30%² of the residual housing requirement; a very significant component of the District's housing land supply.
- 2.28 With this in mind, and given there is very little flexibility for housing supply within the plan, it is right and proper to scrutinise both the principle and details of the emerging New Community.

² 2,400 dwellings as a proportion of the 8,005 dwelling residual stated in Table 2 on Page 33 of the Plan.



2.29 Our objections to the proposed allocation of the Sharpness New Community are grouped into four categories:

- a) suitability and sustainability of the location to accommodate strategic scale development;
- b) viability of the development proposals;
- c) impact upon the Severn Estuary SPA; and
- d) flood risk of the site.

2.30 Each of these concerns individually raise significant doubts over whether the new community allocation is “*justified*” and “*effective*”. When combined however they result in very significant objections to the soundness of this key component of the Plan. Further details are provided below.

a) *Suitability and Sustainability of the Location*

2.31 As outlined above, we consider that Sharpness / Newtown is simply not a sustainable location for strategic scale residential development and that locating a New Community there would run contrary to the strongly framed environmental and sustainability objectives of the draft Plan and key tenets of national planning policy.

2.32 Although Policy PS36 states that “*the development will prioritise walking, cycling and public transport over the use of the private car*” the location of the New Community is such that future residents would inevitably be reliant upon the private car, even if a new train station and rapid bus services are provided; further, in regard to the delivery of services and facilities, and the associated 10ha of employment land, there are significant uncertainties in regard to both the scale of this provision, and its deliverability.

2.33 We consider that there are no reasonably realistic mitigation strategies available – whether through financial contributions or the onsite delivery of infrastructure, which would make the location acceptable for large scale strategic growth.

Employment

2.34 Access to a range of employment opportunities is integral to the success of new communities – with paragraph 72 (NPPF) requiring “*sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access*”.

2.35 The New Community proposes 10ha of employment land, with this sitting alongside wider allocations in the immediate vicinity. However, as identified above, the economic growth strategy



of the district involves an intervention-led approach posited by the Local Industrial Strategy (LIS) which is seeking to deliver employment space above all the published projections. Thus, at the outset, the scale of employment land being proposed is ambitious.

- 2.36 Subsequently, it is therefore necessary to understand whether, if there is a surplus of employment land available, that any occupiers seeking new premises would choose to locate in Sharpness, when there are other sites available along the strategic road network; with the Authority's Employment Land Review (ELR) (2021) explicitly identifying that other sites are more attractive to the market.
- 2.37 A key component of the employment provision proposed at Sharpness is the 'Knowledge Park'. The ELR raises deliverability concerns in regard to the Knowledge Park proposed at Sharpness New Community (paragraph xxi, and 10.4); with the Report noting that similar concerns have been raised by GFirst (paragraph 5.7) and South Gloucestershire Council (SGC) – the author of the Report recommended to the Authority that they seek advice on the deliverability of the scheme from the site promoters. This does not appear to have taken place, or at the very least the results have not been published.
- 2.38 It appears that the potential to provide an extension to Gloucestershire Science and Technology (GSTP) has formed the basis of the aspirations for the employment land at the new community. However, South Gloucestershire Council confirm at paragraph 5.14 that they have their own expansion plans to provide 16ha of land at the existing GSTP site, which would meet the employment needs of this area for the next ten years.
- 2.39 The Report concludes that it was not considered that higher order employment would be delivered in this location – rather B2/B8 units are more realistic, and even then this would be delivered at a relatively slow pace. The scale of employment likely to be generated by the proposal itself is therefore likely to be minimal³, and based upon the Authority's evidence, in the latter stages of the local plan period.
- 2.40 The SA (in scoring the site as a major positive on SA Objectives 16 and 17) indicates that the Garden Village principles will ensure the delivery of the employment land. First, fundamentally there must be demand in this location for the type of employment proposed. Second, it is not evident how the Garden Village principles (as summarised on p31 of the Plan) would assist.

³ Both in terms of scale, but also in terms of employment density – with significant less employment opportunities associated with Use Class B2 and B8 schemes.



- 2.41 It is then necessary to consider whether there is “good” access to employment in larger towns – as per paragraph 72 of the NPPF. In the case of Sharpness, there are not feasible opportunities to do this, and certainly not viable opportunities, upon which any reliance can be placed.
- 2.42 The Sustainable Transport Strategy (February 2021) confirms that Sharpness’s “*relative remoteness*” is an issue in sustainable travel terms. It identifies a single cycle link opportunity (a cycle route from Stroud to Sharpness), but concludes that the distance is a barrier (and users would require ebikes), and thus no trips via this mode are assumed in the traffic study (Appendix E).
- 2.43 Draft Policy 36 sets out that “*direct and attractive express coach/bus services to key destinations, including Bristol and Gloucester, delivered at the early stage and designed to be more attractive than the use of private car for comparable trips*” is required. GCC’s modelling only assumes 20% of trips would be made to central Bristol and central Gloucester via this intervention (Appendix E). According to the anticipated employment locations of residents in Sharpness (Local Plan Traffic Modelling, p194) this only accounts for 18% of trips from the development; thus 20% of 18% is 3.6% of overall trips.
- 2.44 The most significant constraint to the attractiveness of bus services in this location is geography, and the distance from the New Community to the key employment locations south on the A38/M5 at Bristol and north at Gloucester. Bristol City Centre is 22.8 miles and Aztec West 15.1 miles to the south, while Waterwells Business Park and Gloucester City Centre are 14.3 miles and 18 miles to the north respectively⁴. These distances are considerably greater than the average distance travelled by bus for commuting purposes reported in research for the Department of Transport⁵ as 5.3 miles, and significantly undermine the attractiveness of these services to future residents. Notwithstanding this, the cost of this provision would be substantial – the distances involved, and the need to provide frequent services (alongside necessary improvements to the infrastructure to ensure that the speed of services is maximised as far as possible), comparative to the scale of, and build out rates of, the development would render the service in need of significant upfront and then continued investment. It would also need to be demonstrated that in the longer term, the services would be viable.
- 2.45 The reliance on an express bus service (whether referred to as a rapid transit, rapid link or various other iterations) for a new community has been discussed at multiple Local Plan Examinations – most notably, at Uttlesford and North Essex. It notably differs from the provision of enhanced bus services from a pre-existing location (ie an urban extension), and has a higher bar in demonstrating

⁴ Distance travelled measured from the site using Google Maps shortest recommended route.

⁵ Department for Transport ‘Commuting trends in England 1988 – 2015’, Figure 14

its deliverability. From these Examinations, it is clear that the proposal must be supported by clear evidence of:

- a) The scheme, including associated junction improvements, bus priority measures etc;
- b) The cost – both inception, and subsidy;
- c) The timing of the delivery, and if relevant the phasing of the services; and
- d) The viability of the overall proposal – both in regard to during construction, and the long term viability of the continued bus service.

2.46 We have reviewed the evidence published by both the Authority and the site promoter, and none of the documentation adequately addresses these considerations.

2.47 There is no evidence to suggest that the delivery of a passenger rail facility in this location is possible (feasibly or viably); and further that these services which would then be attractive to commuters.

2.48 The Restoring Your Railway Bid published as part of the evidence base indicates that the funding applied for was for monies to draft a Strategic Business Case for a “relatively slow” pilot service – comprising an hourly service. The papers indicate that GCC have raised concerns that the delivery of the railway station would be too late to make any transformational change and associated modal shift, and that the services would need to be subsidised for some time; in addition, the Bid confirms that no engagement has taken place with the potential rail operators. The bid seeks to provide a direct service to Gloucester – which according to the Authority’s evidence, 9% of future residents would commute to from the new settlement. This is 9% travelling to Gloucester City as a whole, and thus those whose work may be within the substantial employment areas on the periphery of Gloucester remain likely to drive.

2.49 Whilst we note that the traffic modelling accompanying the Plan does not assume the delivery of the rail link, this is not the case for the SA; which frequently references it when justifying the sustainability merits of the site. This inconsistency and the SAs disregard for the feasibility and value of the rail service undermines the robustness and reliability of the SA.

2.50 Despite the proposals for new and enhanced rail and bus services, the potential for these to successfully divert trips away from the private car is severely restricted by the inherent unsustainability of the location. No matter what public transport services are put in place, the likelihood is that the vast majority of future residents would opt to use the private car to access services, facilities and employment opportunities. This proposal is therefore contrary to the key issues and priorities defined in the draft plan, and national policy.

2.51 We consider that the proposed New Community at Sharpness fails the ‘justified’ and ‘consistent with national policy’ soundness tests and that this component of the Plan is both internally inconsistent and unsound as a consequence.

b) Viability of the Development Proposals

2.52 The draft Plan makes a number of policy requirements, alongside aspirations set out (and to some extent depended upon to justify this location for growth) in the accompanying evidence base. We comment generally on the viability assessment accompanying the local plan below; however, raise a fundamental concern in regard to the viability of the New Community.

2.53 In particular regard to Sharpness we have the following comments:

- The Viability Assessment (p122 Appendix 8-10) confirms the assumption of 99.792ha gross to 64.865ha net has been used. The draft Policy requires a 35ha Nature Reserve and at least 44.16ha⁶ of SANG. This doesn’t account for general green infrastructure requirements, alongside the other usual reductions to gross area;
- The infrastructure requirements associated with Sharpness have been significantly underestimated. As per above, there are considerable costs involved in the delivery and operation of an express bus service, delivery of a rail station and rail services, alongside the front loading of community infrastructure as a result of the lack of existing infrastructure available for use in the locality;
- The land costs associated with the SANG and new Nature Reserve, alongside the construction and long term maintenance and management costs which would go far above the general green infrastructure assumptions underpinning the viability assessment work;
- The proposal is predicated on achieving zero carbon development, delivering a MaaS system, the Transport Assessment includes a future water taxi, and contributions to the restoration of the Canal. These are all exceptional infrastructure costs, and yet the suggested infrastructure costs for this site are less than those for an urban extension to a City. We therefore assume that these have yet to be modelled.
- Market Values – we note that the Viability Assessment applies an uplift to the expected market values for the New Community on the basis of recent values achieved in Thornbury, South Gloucestershire (paragraph 4.57). This is not comparable. Thornbury is a thriving

⁶ 8ha required per 1,000 residents; assume 5,520 residents (2.3 persons per house)*

market town on the peripheries of Bristol – it has a significantly greater existing range of services and facilities than is proposed at Sharpness (even when completed), and further is within easy reach of Bristol – with edge of Bristol employment locations within cycle distance, and a frequent and quick regular bus service to the City Centre and its fringes. Sharpness is some 10 miles further from Bristol than Thornbury, and by virtue of the local road network, significantly less accessible to Bristol urban area (and the unmet need from here which is fuelling the house prices around its immediate peripheries).

- Garden Village – the Viability Assessment adds a Garden Village premium to the market values, and then an associated cost reduction of 2% to the site construction costs. Neither of these are justified or evidenced. Indeed, the justification for the cost reduction pertains to a 2012 commentary piece published by the TCPA; masterplanning practice and design principles have significantly advanced since 2012, and we would anticipate that there are now likely to be limited differences between a masterplan for a Garden Village, and a high quality masterplan for an urban extension (with the dominance of cars and roads, which appears to be the justification for the 2012 conclusions, addressed in national policy and guidance on design). Indeed, the Vision Document from the promoter of the New Community contains masterplans which don't establish any different design principles than those for other large scale sites; and indeed, the relative remoteness of the site isn't anticipated to be conducive to lower car ownership levels.

2.54 For the reasons set out above, there is no evidence to demonstrate that the New Community is viable or deliverable and the allocation is not therefore justified or sound.

c) Impact Upon the Severn Estuary SPA

2.55 The proposed New Settlement is within a few hundred metres of the internationally designated Severn Estuary Special Protection Area (SPA). Accordingly a Habitat Regulations Assessment (HRA) (May 2021) has been made of the impact of these proposals within the of the Plan.

2.56 This indicates a requirement for SANG alongside a Nature Reserve (paragraph 6.42). As set out above, the deliverability of these requirements has not been assessed in the Viability Assessment. If demonstrated as viable, it is also necessary to understand the implications these requirements will have on the delivery timetable for the site, the HRA explicitly notes that for the SANG in particular, this must be functional prior to occupation of the development – thus indicating a substantial lead-in time before any completions can take place on the site.

2.57 The HRA, at paragraph 6.50, identifies some uncertainty in regard to the mitigation proposed for the New Community, and indicates that monitoring would be required, and any failure to mitigate

would need to be addressed as part of the Phase 2. However, the Phase 2 is no longer included in the Pre-Submission Plan (extending the site from the 2,400 to 5,000 units), and further, would not come online for c15-20 years (assuming a local plan review in 5 years); thus indicating that if the mitigation identified is not functioning, there is a significant risk of adverse effects on the designation.

- 2.58 Based upon the analysis and conclusions of the HRA there is a high probability that the proposed New Community at Sharpness would have an adverse effect on the integrity of this important European Site. In such circumstances, unless convincing evidence is provided to the contrary, the precautionary principle must be adopted and accordingly “*when the likelihood of significant effects cannot be ruled out on the evidence available, it must be assumed that a risk of significant defects may exist*”.
- 2.59 If the conclusion remains that significant effects cannot be ruled out at the Appropriate Assessment stage, then SDC must move on to consider alternative solutions. The guidance on the Habitat Regulations process is helpfully explained in the Planning Practice Guidance⁷. There it states that:

“Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view the site’s conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site’s integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured”. [our emphasis]

- 2.60 There is an alternative available which would not harm the integrity of the SPA. Moreover, for the reasons set out in these representations that alternative – the allocation of Land at Whaddon – represents a more sustainable and deliverable strategic scale development than the New Community at Sharpness.

d) Flood Risk

- 2.61 There is insufficient evidence on the flood risk implication of the New Settlement: both in terms of demonstrating that the development would be safe for its lifetime, and more broadly, that it has passed the Sequential and Exception Tests.

⁷ Paragraph 001 Reference ID: 65-001-20190722

- 2.62 The Strategic Flood Risk Assessment Level 2 (May 2021) does not include a Sequential Test. Further it raises significant concerns in regard to the allocation at Sharpness:
- The land at Sharpness is currently protected by flood defences. At p76 (Appendix Q) the potential for overtopping of these defences in the immediate future is noted, and the need for the development to consider improvements to these is recognised. This has not been reflected in the IDP or viability assessment; nor any evidence provided to indicate that this is a feasible and acceptable mitigation strategy;
 - The SFRA utilities models from 2007 and 2016, which does not form an appropriate basis to consider flood risk in this location given the combined tidal and fluvial influences;
 - The SFRA considers the development scenario of 2080 – this does not represent the lifetime of residential development; and
 - The SFRA identifies in the 2080 scenario that the risk of tidal and fluvial flooding on the site would “significantly increase”, but does not consider the implications of the overtopping of the defences, and the extent of the subsequent flooding on the site.
- 2.63 The allocation of a New Community in a location which is subject to tidal and fluvial flooding requires a robust evidence base to demonstrate that it is both safe (for the appropriate lifetime of the development), and that necessary mitigation measures are deliverable (both from a feasibility and viability perspective).
- 2.64 Appropriate evidence is required at the plan-making stage to ensure both the sequential and exception tests are met. In accordance with paragraph 157 of the Framework, the spatial strategy should take a sequential approach to the location of development, and seek to direct development away from areas which are currently or will be in the future, subject to flood risk.
- 2.65 Land at Whaddon represents a sequential preferable site, and has already been identified in the evidence base as an appropriate location for strategic growth.

3. Land at Whaddon – G2

- 3.1 Whilst we support the identification of the Land at Whaddon in the Plan as a suitable and sustainable location for growth, we outline above our concern that it is a ‘safeguarded’ site despite its clear position as the most sustainable location for strategic scale development within the District. It should therefore represent a component of the housing supply for Stroud, allocated through the emerging Local Plan.
- 3.2 The allocation of Land at Whaddon represents a logical and deliverable replacement for the Sharpness New Community or a sound allocation in its own right.
- 3.3 We do not reiterate our earlier representations in this regard, with the identification of the site in the Pre-Submission Plan, and the accompanying evidence base, clearly demonstrating the acceptability and merits of the site itself.
- 3.4 We note that the SA (May 2021) has reviewed all the strategic sites, and we support the amendments made to the assessment for Whaddon, which increases its sustainability ‘score’ following the drafting of the allocation policy. We have the following additional comments to make:
- SA 10 - Air Quality: this score is based upon the SALA Transport Accessibility Assessment. We have not been able to find this in the published evidence base. Whaddon scored 98 in terms of transport accessibility. Without the evidence base being published it is not possible to establish the validity of this assessment, however, we do note that Sharpness scored broadly the same (at 97). Given the clear and demonstrably differences in regard to the accessibility of the two sites, we struggle to understand how the same score (and thus the same impact on air quality) could be attributed to both locations. Land at Whaddon is demonstrably more sustainable, and would produce less transport emissions as a result.
 - SA 12 – Flooding: It is assumed that this score and the commentary that accompanies it has been included in error as it is not accurate to say that “*a large proportion of this land falls within flood zone 3a and 3b*”. Indeed, this conclusion directly contradicts the conclusion of the JCS Inspector which states that “*Whereas the functional floodplain runs through the site along Daniels Brook, taking up about 7% of the site according to the developers, the masterplan shows it being used as well integrated green infrastructure. This, I am told, is integral to resolving flooding issues downstream in Gloucester and should be considered a benefit.*” As the Inspector has concluded, far from being a negative impact, the development would assist in resolving downstream flooding issues within Gloucester. In light of this, the site should be scored positively.



Allocation Policy: Land at Whaddon

- 3.5 The land covered by Policy G2 – Land at Whaddon – is adjacent to the southern boundary of the Gloucester City urban area and, whilst presently in agricultural use, the urban influence gives the locality a peri-urban or ‘urban fringe’ character. Although L&QE has an interest in only the northernmost part of the area identified under Policy G2, this section of the representations addresses the allocation as a whole.
- 3.6 L&QE are working alongside the other promoters, Taylor Wimpey and Newland Homes, to deliver a coordinated approach to development in this location.
- 3.7 We note that the land area identified does not appear to reflect the land being promoting – with an additional land area in the southwest corner falling within the allocation boundary, but not forming any part of the development proposals. We are not aware that this is required to meet green infrastructure requirements, and as such, we recommend that the boundary be revised (and the evidence base, notably the Viability Assessment refined to ensure that it reflects the development proposed).
- 3.8 For the avoidance of doubt, we suggest that the plan on p160 of the Plan references the land falling within the Gloucester boundary and, within the policy explanatory text, wording is added to ensure that this area forms part of the comprehensive planning undertaken in regard to the site.
- 3.9 In regard to the site specific policies, we have the following comments to make:

<ul style="list-style-type: none"> At least 3,000 dwellings, including 30% affordable housing, to address tenure, type and size of dwellings needed within the Gloucester City area; 	<p>This is supported, subject to our comments below in regard to the viability evidence. We comment elsewhere in this representation on whether the site should be required to meet Gloucester City needs as opposed to meeting the needs of Stroud.</p>
<ul style="list-style-type: none"> A serviced site to accommodate 8 plots for travelling showpeople to meet the unmet needs arising from the Gloucester City area; 	<p>We are concerned that Site G2 does not represent a suitable location for this provision.</p> <p>We note that draft Policy CP10 identifies a mechanism to deliver additional plots/pitches, and Stroud have chosen not to allocate any sites within their own designations to meet the shortfall in need (both from Stroud and Gloucester).</p>



	<p>Our principal concern is in regard to the ability to deliver plots with suitable highway access, when balanced against the wider placemaking aims.</p> <p>The requirements for travelling showpeople plots would assumedly require the site to be located immediately adjoining Stroud Road; with the highways to the north and south not suitable for this access.</p> <p>There are limited opportunities along Stroud Road, and indeed the Authority have identified this as a swathe of strategic green infrastructure. In practice, there are limited locations along the eastern edge of the development which directly adjoin this road network, and these are currently identified on the emerging Masterplan for the multi-modal interchange hub (as requested by the policy) and other community infrastructure such as a local centre and secondary school.</p> <p>There appear to be alternative locations within Stroud including at the other strategic allocations where there is far better access to the strategic road network. In such circumstances, it is not at all clear why no alternative locations were considered before this policy requirement applied to the Land at Whaddon.</p>
<ul style="list-style-type: none"> • A 3FE primary school and a 2FE primary school (both incorporating early years' provision) and contributions towards the provision of a 3.5FE secondary school (+ 6 form) on a 8.7 ha site within the development; 	<p>We support the provision of education facilities on the site, however do not consider that the scale of provision required reflects actual need. We note that GCC's pupil projections have recently been successfully challenged at planning appeal, and indeed the Plan's evidence base itself raises some concern in regard to the requested requirements.</p> <p>In light of the recent appeal decision, we will work with the Authorities to ensure that a robust education strategy is in place which appropriately responds to the needs of the development, and its anticipated phasing.</p>
<ul style="list-style-type: none"> • A site for a new surgery or contribution towards the extension of existing health facilities to support the development; 	<p>We support this principle.</p>
<ul style="list-style-type: none"> • Accessible natural green space along the Daniels 	<p>We support this principle.</p>

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<p>Brook providing a net gain to local biodiversity and public outdoor playing space, including on-site community building and contributions to off-site indoor sports and leisure facilities, in accordance with local standards;</p>	<p>The need for contributions for off-site indoor sport and leisure should be considered based upon detailed evidence at the planning application stage.</p>
<ul style="list-style-type: none"> On site and, if appropriate, off site work to mitigate against the identified impacts of development upon the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC sites; 	<p>We support the principle that there remains some flexibility in regard to the potential mitigation for impacts on the designated habitats. At present, the Authority have yet to publish the full evidence base supporting the HRA, and once published this may present an opportunity to refine this policy requirement.</p>
<ul style="list-style-type: none"> A local centre, incorporating employment, local retail and community uses to meet the needs of the development; 	<p>We support this aspiration, and the nature of the local centre will be determined through the application process.</p>
<ul style="list-style-type: none"> Structural landscaping buffer along the western, southern and eastern boundaries incorporating existing and new native hedgerows and trees and linking with existing green infrastructure; 	<p>We have no comments on this requirement, recognising that a high quality landscape scheme will be required to support the development.</p>
<ul style="list-style-type: none"> The acceptable management and disposal of surface water, including sustainable drainage systems (SuDS); 	<p>We have no comments on this requirement.</p>
<ul style="list-style-type: none"> Adequate and timely infrastructure to tackle wastewater generated by the development, in agreement with the relevant water company 	<p>We have no detailed comments on this policy, albeit note that this is covered by separate legislation.</p>

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<ul style="list-style-type: none"> • A layout, density and built form and character which reflects the sensitive landscape and heritage context provided by the Cotswolds AONB and local heritage assets including Whaddon Church respectively; 	<p>We have no comments on this requirement; and the emerging masterplan for the site sensitively addresses its context, including these identified features.</p>
<ul style="list-style-type: none"> • A layout which prioritises walking and cycling and access to public transport over the use of the private car by, for example, providing a network of internal walking and cycle routes that are shorter in distance than the highway network, in accordance with Manual for Streets 	<p>We have no comments on this requirement.</p>
<ul style="list-style-type: none"> • High quality and accessible walking and cycling routes within the site including the retention and diversion of existing footpaths as necessary, the provision of connections to Waterwells Business Park and local facilities within Tuffley including appropriate infrastructure and crossing facilities and contributions towards the enhancement of off-site walking and cycling routes to key destinations including to Gloucester city centre; 	<p>We have no comments on this requirement.</p>
<ul style="list-style-type: none"> • Contributions and support to sustainable transport 	<p>We have no comments on this requirement; with the scale of contribution to be considered through the planning</p>

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measures on the A4173 sustainable transport corridor;	application stage and/or forming part of a wider scheme funded through CIL.
<ul style="list-style-type: none"> Multi-modal travel interchange hub at a central accessible location adjacent to the A4173 to allow for interchange for sustainable modes including bus, bicycle, walking and car sharing 	We have no comments on this requirement.
<ul style="list-style-type: none"> Public transport permeability through the site, including a link between Naas Lane and Grange Road and bus stops and shelters at appropriate locations within the development to access existing diverted and new bus services and contributions to enhance bus service frequencies to key destinations including Gloucester, Stroud and Stonehouse; 	We have no comments on this requirement.
<ul style="list-style-type: none"> A movement strategy that provides for a modal filter onto Naas Lane, providing access for sustainable transport modes only to Waterwells Business Park and local destinations to the west 	We have no comments on this requirement.
<ul style="list-style-type: none"> Electric vehicle charging points in accordance with local parking standards 	We have no comments on this requirement.
<ul style="list-style-type: none"> Behavioural change measures to encourage sustainable travel by way of new and improved infrastructure and 	We have no comments on this requirement.



<p>implementation of a Travel Plan</p>	
<ul style="list-style-type: none"> Primary vehicular access from the A4173 and additional vehicular access from Grange Road, with necessary improvements to the existing highway network; 	<p>Whilst the policy doesn't preclude more than two site accesses, the way it is drafted could infer this. We suggest that the wording 'and others as agreed through the planning application process' should be added.</p>
<ul style="list-style-type: none"> Any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location; 	<p>We have a concern in regard to this policy aspiration as drafted. The IDP identifies all infrastructure associated with development across the district – it doesn't distinguish between CIL or s106; and is fairly high level in its nature.</p> <p>The planning application process will identify the requirements for infrastructure enhancements based upon a detailed evidence base.</p> <p>We suggest that references to the IDP is moved to the explanatory text as providing the starting point for the discussions.</p>
<ul style="list-style-type: none"> Phasing arrangements to ensure that employment, retail and community provision is made in a timely manner. 	<p>The detailed phasing strategy will be agreed through the planning application stages in accordance with detailed evidence.</p>

Meeting Gloucester's Needs

- 3.10 We have explained elsewhere in representations why we consider that the site should be allocated now and not tied to the future needs of Gloucester City. In the event that the Inspector disagrees with our proposition, then the mechanism required to release the site needs to be clarified.
- 3.11 Paragraph 3.4.23 provides the clearest position on the proposed mechanism for the release of the site. This assumes that during the course of the examination of the Stroud Local Plan that Gloucester City will be in a position to articulate its unmet needs and preferred direction of growth, such that the allocation can be confirmed. This mechanism is supported.
- 3.12 We note elsewhere however that reference is made to an 'approved' strategy. We assume this is referring to the emerging JCS Review, however, it is unclear what is intended by the word

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'approved'. The adoption of the JCS Review is not anticipated until after the Stroud examination will have been completed and hence it is assumed that the word 'approved' in fact refers to the publication of the draft JCS which is expected before the end of 2021. For clarity, this should be confirmed, and more explicitly referenced in the Plan.

4. Policy Review

Policy DCP1

- 4.1 Core Policy DCP1 lists the high level measures by which the Authority will seek to deliver Carbon Neutrality by 2030.
- 4.2 A significant number of these measures (notably in respect to the location of development relative to services, facilities and sustainable travel modes) are integral to the spatial strategy as opposed to directly relevant to the determination of the planning applications for individual site proposals.
- 4.3 The subsequent references to maximising green infrastructure, the energy hierarchy, reducing waste, and addressing vulnerability and resilience to climate change are all matters which are capable of being considered through the more detailed development management policies.
- 4.4 Overall, we support much of the approach proposed through Core Policy DCP1; however, we would question the purpose this separate policy is seeking to achieve.

Policy CP2

- 4.5 For the reasons we have explained elsewhere in these representations we object to the current housing requirement, and the allocation of land at Sharpness for 2,400 dwellings during the plan period. The Sharpness allocation is in our view unsound and the implication is that this allocation should be deleted from the plan and replaced by the allocation of Land at Whaddon.

Policy CP5

- 4.6 Policy CP5 sets out an additional set of development principles for strategic sites which we assume means those identified in the first part of the table in CP2. We support the principles set out in this draft Policy, however raise a number of comments and, in places objections:
 - Bullet 4 – is the intention of the wording to require a separate approval process for an indicative masterplan? Given the allocating policies each require Development Briefs, and indeed, given the requirement for these strategic sites to come forward in a timely manner, the inclusion of another stage in the pre-planning process is not considered necessary as conducive to the timely delivery housing.
 - Sustainable Construction Principles – as drafted these do not provide a basis upon any future planning application would be considered, and a judgement made in regard to



whether a development sufficiently maximises its contribution to these objectives. We comment elsewhere on viability, but this is material to this policy. The requirements to maximise low/zero carbon energy, minimise emissions and improve energy performance, minimise water consumption etc all pertain to recognisable assessment processes – through which a development proposal can be considered, and compliance confirmed. Indeed, Building Regulations provide numerous mechanisms to assess these both at basic and enhanced standards and it is through the Building Regulations regime where these matters more comfortably sit.

- Sustainable Materials – it is not clear how this policy would work in practice: what is required, how it is assessed etc.

Policy CP7

- 4.7 It is not clear what the role of this policy is in practice. In regard to meeting specific needs, it is the role of the Authority to assess the housing needs of respective groups and to set this out in policy, and beyond this, we note that the policy requirement for a Health Impact Assessment will address wider design and placemaking considerations.
- 4.8 The reference to s106 contributions for a Community Development Officer is not supported. There is no clarity on their role or responsibilities, and indeed, justification as to why this contribution would be necessary to make the development acceptable.

Policy DCP2

- 4.9 We support the principle that developments should meet a range of housing needs, including housing for older people. The mix for any particular site will depend on its characteristics and placemaking principles, alongside localised variations of need.
- 4.10 The requirement for 67% of housing at Part M4(2) and 8% at Part M4(3) does not appear to be supported by the evidence base in terms of need, nor the viability evidence supporting the plan.
- 4.11 The PPG explains that “*planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors*”. The LHNA indicates that there is a need for 8,848 dwellings for combined Part M4(2) and (3) – Figure 78. This appears to relate to those households which will have a health problem which will affect their housing need by to 2051 – 10 years beyond the plan period. It is not appropriate for current developers to be required to meet a future need beyond the plan period.



- 4.12 Further, when describing the health problem which will affect housing need, it is not clear whether this is the baseline, ie it is then necessary to discount those households whose existing home is suitable, or can be made suitable following adaptation; as is the case with the current need in Figure 77. This significantly reduced the overall existing need for these enhanced standards, and as such, we would assume this would be similar for the future need estimate.
- 4.13 Finally, we note that the figures given in the LHNA are described as covering both Part M4(2) and (3) – and thus the requirement for 67% and 8% - combined at 75%; would represent a requirement above the LHNA's calculation of need, notwithstanding that this appears inflated.

Policy CP9

- 4.14 Policy CP9 requires the provision of 30% affordable housing on sites of 10 dwellings or over. We do not object to the principle of an affordable housing requirement articulated through policy, however, consistent with the provisions of paragraph 67 of the Framework, it is important that this is subject to viability testing in order that the implications of the various policy requirements can be examined at locations across the plan area.
- 4.15 We note that the Pre-Submission Plan, at paragraph 4.20, states that the viability evidence indicates the Authority's preferred affordable housing mix is not viable, however, this isn't accurate. The Viability Assessment indicates that the sum of all the policy requirements renders the spatial strategy unviable – notwithstanding any adjustment in the expected mix.
- 4.16 The soundness of this policy, and the 30% affordable housing requirement, will need to be considered in the round as part of the discussions on the viability of the plan as a whole.

Policy DHC7

- 4.17 Policy DHC7 provides the standards for the provision of new open space and recreation facilities which are to be applied to new residential developments. It is helpful that the Draft Plan sets out standards which can then be used in the masterplanning of residential development proposals. We do however have a number of concerns with the proposed approach in the policy.
- 4.18 There are a total of eight different open space typologies, each with individual standards. Whilst some of these are clearly distinctive, such allotments and children's play provision, there are others which conceivably overlap. The Open Space, Green Infrastructure, Sport and Recreation Study (2019) clearly identifies duplication of the Parks and Recreation provision which it states should include at least two facilities for example pitches/courts and childrens play space; and later confirms that this can include publically accessible sports pitches (p68). In reviewing the Playing Pitch



Strategy (2019), it is not possible to identify where the separate requirement for a further 0.7ha of playing pitch provision is justified.

- 4.19 Second, planning obligations can only be used to secure land uses or financial obligations where they meet the statutory tests⁸. The first of these tests is that they are “*necessary to make the development acceptable in planning terms*”. It is only necessary to provide new open space where the development proposed would create a deficit in provision which needs to be remedied through the application proposals. The final paragraph of the Policy is in conflict with the statutory tests and should be changed to make it clear that provision will only be sought where there is a deficit within the local area for that typology; there is no need to interchange the requirement where there is an overprovision in one category and under provision in another.
- 4.20 Third, in addition to the eight open space typologies, there are a further four standards for built recreation facilities. These are precisely the type of facilities which should be provided through CIL contributions where a demand exists. Facilities such as swimming pools and health & fitness studios are also typically provided by the private sector where market demand exists, and it is not the role of the development industry to support these. It is not therefore necessary for the local authority to seek to provide these or to take contributions towards provision.

Policy CP13

- 4.21 The draft Policy omits the prima facie position that the starting point for sustainable travel is to minimise the need to travel, and that climate change and carbon reduction policies should prioritise the re-use of existing infrastructure.

Policy EI12

- 4.22 We have objection to this policy as drafted, recognising that its application will vary depending on the site in question. Within Appendix C and the reference to electric charging points, we suggest that this is explained fully, and in practice, there remains significant debate on what this means, ie a fully functioning charging point, a ducting connection etc.

Policy DE11

- 4.23 It is not immediately clear what the intention of this policy is, and how it relates to development proposals coming forward. A sustainable transport strategy already underpins the emerging Plan, and should have come forward alongside the spatial strategy – informing the opportunities and

⁸ Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.

constraints to deliver sustainable travel which may impact on the chosen spatial strategy, and then identifying the delivery mechanisms to ensure that the preferred spatial strategy maximises sustainable travel choices. Development management policies can then be used to consider individual sustainable travel choices.

Policy CP14

- 4.24 This policy duplicates a number of other policies contained throughout the Pre-Submission Plan, and we suggest that it is revised to reduce this.

Delivery Policy ES1

- 4.25 Policy ES1 contains a large number of detailed measures to be required from new residential development proposals. We address these below:

Achieving Net Zero

- 4.26 L&QE are committed to addressing the climate crisis, and are actively responding to the challenge by seeking to deliver housing above current building regulation standard, and in their most recent Corporate Strategy have committed to establishing an L&Q design standard to address the emerging Future Homes Standard, and more broadly are investing in modern methods of construction (MMC). However, this is finely balanced against viability (and delivering on other priorities), alongside the feasibility and practicalities of delivery enhanced standards in a timely manner.
- 4.27 The Pre-Submission Plan references the Future Homes Standard, and indicates that it is seeking to accelerate the move to zero carbon development in advance of this. The evidence published by the Government alongside the Future Homes Standard expressly referencing the need for a staged approach to changing the Building Regulations to reflect the need to develop supply chains, skills and construction practices. In seeking to set a higher standard at an early point, the Authority will need to demonstrate how these barriers will be overcome to ensure that they do not compromise the delivery strategy – and in particular, the delivery rates on the strategic sites.
- 4.28 Notwithstanding the requirement for further evidence, we note that the Authority's viability evidence, concludes that this draft policy requirement is not viable, and would significantly undermine the overall deliverability of the plan. It is therefore unsound as a development management policy such as this must be demonstrably deliverable based on the viability evidence of a 'standard' development. A viability mechanism is only appropriate to reduce the cumulative

regulatory burden where a non-standard development is submitted which has higher than anticipated costs.

- 4.29 This is implicit in NPPF paragraphs 16(b), 34 and 57 all of which relate to the need for Local Plans to be deliverable (at the point of adoption) and have regard to viability. Specifically in relation to 'climate change' policies, the PPG advises that:

"The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability". [Paragraph Reference ID: 6-009-20150327]

- 4.30 In addition to the physical costs of the carbon reduction through design, it will also be necessary to identify the financial contributions required to offset the residual carbon generation, as required by the draft policy.
- 4.31 Unless the Authority's net zero policy aspirations are proven to be feasible, viable and achievable in practice (alongside wider development management policies), it will seriously jeopardise the delivery of other priorities and policies, including the delivery of its housing needs, affordable homes, and put into question the deliverability of the Local Plan as a whole.

Delivery Policy DES3

- 4.32 We object to draft Policy DES3 and the establishment of a development management approach which requires viability testing for a communal heat supply. As set out above in relation to Policy ES1, viability evidence is required to demonstrate that this is viable at the outset of the local plan. The burden of evidence should not be transferred to the applicant to prove that something is not viable if it has not been shown to be viable at the local plan stage.
- 4.33 In regard to the local plan reference to future proofing, it unclear what this requirement means in practice, and what the design implications (and associated costs) would be.
- 4.34 Beyond this we raise an in-principle concern with the indication that a communal heating system is preferable – indeed, it is not always the most environmentally or financially efficient way of heating a new development. There is limited regulation or transparency, and can result in future residents being liable for significant charging above 'market' energy; and further, that there are no guarantees

the energy used within the network is any less polluting than the national grid – particularly given its decarbonisation programme.

Policy ES5

- 4.35 We have no objection to the policy as drafted. However, paragraph 6.42 incorrectly discusses a 10km radius for impact of air quality on the SPA/SAC. This does not reflect best practice or guidance, the impact of air quality on sensitive ecological assets is considered based upon changes to traffic flows (at AADT) on roads within 200m of the designation.

Policy ES6

- 4.36 We recognise and support the emerging national legislation seeking a 10% net gain in biodiversity. We assume that the Authority are intending on utilising the DEFRA metric in the intervening period prior to the implementation of the legislation. We suggest that this is confirmed in the policy given there are a number of other historic metrics, and the delay in the Environmental Bill may mean that the Local Plan is implemented prior to the national legislation.
- 4.37 The draft Policy requires some amendments to ensure that it complies with national legislation, policy and guidance. First, the reference to 'causes harm' under the Internationally important sites discussion should be amended to having an adverse impact on the integrity of the designation; with this reflecting the test set out in the Habitat Regulations which this policy is seeking to duplicate.
- 4.38 Second, in relation to 'adversely affect', and the reference to national designations, this does not reflect paragraph 175 of the NPPF, which confirms that any residual adverse impact would be weighed against the benefits of the development.
- 4.39 Finally, the policy includes a test of no adverse effect on local sites – both designated and the more generalised network. This is not a proportionate response to the importance of these assets. If both international and national designations can, in accordance with national policy, be subject to a degree of residual adverse harm, with this being weighed against the benefits of the scheme, then it is not considered reasonable that a higher bar is set for local sites.
- 4.40 Notwithstanding this, there must be a clear distinction between designated local sites, and 'local ecological or green infrastructure networks' the latter could be applied to virtually all land within the district boundary. Indeed the Gloucestershire Nature Map referenced in the explanatory text

indicates green infrastructure opportunities, recovery areas etc over vast parts of the district. We understand that a key element of this map is from modelling, as opposed to site specific surveys, and as such, it should be described as providing a starting point for the consideration of habitat protection, restoration and enhancement, as opposed to being identified as a baseline of valuable habitat – the wording of paragraph 6.50 should be amended to reflect this.

- 4.41 We note the reference to recreational impacts on designations at paragraph 6.54, and recognise that this needs to be addressed through the local plan and subsequent planning application processes. The inference that all development will have to pay a contribution is not supported. The mitigation strategy has yet to be published, and (as set out in the allocating policies), there are clearly opportunities at strategic sites for mitigation to be provided onsite. Further, the text assumes that development needs to proceed to Appropriate Assessment – this is not accurate, as it may be possible to screen out the need for this through the development management process. The wording of this paragraph should be reviewed.
- 4.42 The Cotswolds Wood SAC Mitigation Strategy must be published as part of the evidence base supporting the Local Plan, to ensure that all parties are able to review and comment upon a document which the Authority are seeking to rely upon within the HRA accompanying the local plan.

Policy ES8

- 4.43 We support the aspiration of this policy, and recognise the importance attached to trees and hedgerows. The policy as drafted seeks to extend the policy protection provided by the NPPF under paragraph 175 to ancient and veteran trees to a wider number of features including ‘locally valued’. This is not appropriate, with protection required to be proportionate.
- 4.44 There is no description as to what constitutes a locally valued trees, and as such, it is not possible for either a developer, the local community or indeed the Authority to effectively implement this element of the policy.

Policy ES10

- 4.45 The policy takes a positive approach to the protection and enhancement of heritage assets – and seeks to identify measures of local importance, and assumedly would rely on national planning policy when considering the degree of harm caused to any heritage assets as a result of development



- 4.46 We support the principle of 3(4) and the use of heritage assets within placemaking through the creation of views and vistas where appropriate. As currently drafted, it may read that all existing views to such an asset should be protected. We suggest the wording is amended, and that rather than protecting and enhancing views, the policy emphasises the importance of considering the opportunities of views and vistas to inform design and placemaking. 'Protection of Views' is not in itself a heritage consideration, it is rather the assessment of the significance of these views within the wider setting of any heritage asset which is important in determining planning applications.

5. Viability and Infrastructure Evidence

- 5.1 We previously made comments on the informal consultation on the emerging Viability Assessment in June 2020, and we note that the updated Viability Assessment considers and responds to this submission.
- 5.2 Nevertheless, we continue to raise significant concerns in regard to the deliverability of the Pre-Submission Plan, and as such, its soundness under paragraph 35 (NPPF).
- 5.3 We set out our concerns in detail below, but note at the outset that we consider that (with the exception of Sharpness – discussed separately), the principle matter undermining the viability of the Plan at present is the sum of the individual policy requirements which the Authority are seeking at present. The viability evidence clearly demonstrates that these are not viable – both in respect to the strategic sites, and within the general typologies.
- 5.4 This isn't an unusual position, with the entire purpose of the plan-making system, and indeed viability exercise, seeking to achieve an appropriate balance between aspirations and deliverability. This has not been achieved at present, and the Pre-Submission Plan continues to set policy requirements which are not deliverable: a position which is recognised in the Authority's own viability evidence base.
- 5.5 For the avoidance of doubt, it is also necessary to confirm that the local plan should be viable on adoption. The NPPF paragraphs 16b), 34 and 57 all relate to the need for Local Plans to be deliverable (at the point of adoption) and have regard to viability and the PPG section in relation to 'climate change' advises that:

“The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability”. [Paragraph Reference ID: 6-009-20150327]

- 5.6 It is not appropriate to rely on viability mechanisms set out in development management policies, particularly given the evidence indicates that a significant majority of sites would be required to undertake this exercise through the planning application stage. Whilst the PPG sets out some circumstances through which a viability assessment may be appropriate at the planning application



stage, this isn't intended on applying to 'standard' sites nor indeed allocations unless significant additional site or infrastructure costs become available (PPG 10-007-20190509).

Market Values

- 5.7 We support the adjustment made in respect to the Gloucester Fringes, and the rebasing of the values following sale value information supplied by a number of the housebuilders active in the immediate area.
- 5.8 We raise a significant concern in regard to the value assumptions made for the two new communities – in particular, at Sharpness. We express these fully above, in our review of the Sharpness allocation, but note here that the comparable used (at Thornbury) is completely unjustified, and fails to reflect the clear difference between the existing thriving market town of Thornbury which has a significantly greater range of existing services and facilities than those planned at Sharpness, and is demonstrably more accessible to Bristol than the new community. These are not comparable, and the uplift to the value assumed at Sharpness, is not justified.
- 5.9 In our previous representation we indicated that a greater degree of analysis was required to support the house prices assumed for the two new settlements. They are entirely 'new' communities, and the use of price paid figures for smaller village schemes within the area of the new settlement (or as per above a non-comparable market town in the Bristol periphery) doesn't provide a robust basis upon which to set market values for these new communities.
- 5.10 It is also necessary to consider the changing values within these new settlements over the substantial build period; where, unlike proposals for urban extensions, they will likely lack the range of services and facilities at the beginning of the period rendering them less attractive to purchasers, which would be reflected in the sale values in the earlier stages of delivery.
- 5.11 We have a significant concern with decision to add a premium to market values at Wisloe and Sharpness by virtue of them being a 'Garden Village' (paragraph 4.58). This appears to be based upon representations to that effect by the site promoters, however, no evidence is provided to justify this position, or indeed indicate that this has been achieved elsewhere.

S106/Site Infrastructure

- 5.12 The VA includes an allowance for s106/site infrastructure for each strategic site – updated in May 2021 as set out in Table 7.3; however, no evidence has been produced to set out how these figures have been reached. We requested this previously.



- 5.13 We have reviewed the Infrastructure Delivery Plan (IDP) (May 2021) however, there is no correlation in the sum of the infrastructure identified within the IDP and the figures utilized in the viability assessment.
- 5.14 The assumptions underpinning the strategic infrastructure costs must be published to enable appropriate review by the developers in accordance with national policy and guidance.
- 5.15 In this respect, we continue to have significant concerns as to why the infrastructure and mitigation costs associated with urban extensions (in particular Whaddon) are higher than the establishment of a new community at Sharpness. As set out above, we assume that this is because the infrastructure costings do not fully account for the infrastructure requirements associated with the new community – for example the rapid bus service, road infrastructure, rail station and line subsidy, the Nature Reserve and SANG, flood defence improvements, a water taxi etc. These all reflect specific infrastructure requirements for Sharpness far above those required for the other strategic sites in the Pre-Submission Plan; and yet the new community alongside Sharpness Docks, has the lowest infrastructure cost per dwelling out of all the strategic sites. This is not considered robust.
- 5.16 We will review the infrastructure assumptions when the full evidence base is published.
- 5.17 In light of the recent appeal decision successfully challenging GCC’s pupil projections, the assumptions underpinning the education element of the infrastructure costings should also be reviewed.

Build Costs

- 5.18 We commented above on the lack of evidence supporting a 2% reduction in build costs at Sharpness and Wisloe as a result of the ‘Garden Village’ principles. This isn’t supported by any evidence. Indeed, the referenced document is from 2012, and appears to infer that the principle difference is the reduction of land given to roads and parking. Since 2012, best practice in placemaking has already seen this shift, and we would suggest that there would now be fairly limited (if any) difference in this regard between a high quality, well planned strategic site and a strategic site built as a Garden Village.
- 5.19 Further, given the respective locations of the two new settlements, it is not envisaged that there would be any significant reduction in car parking provision from any other strategic site (indeed, there may be more than the other strategic sites directly bordering existing towns and cities). This

is emphasised by the fact that the proposals are for new garden villages, and the new local facilities and services will be limited as such, compared to the concept of a Garden City which would have significant higher order services and facilities accessible via sustainable travel choices.

Land Requirements

- 5.20 We commented above in respect to the gross land take assumption for Whaddon – with an area of land in the Authority’s allocation area not being promoted, and not forming part of the emerging masterplan for this strategic site. The land area should be amended, and the viability report updated.

Part M4(2) and (3)

- 5.21 Paragraph 8.28 indicates that the Viability Assessment assumes a cost of Part M4(2) of £597 per dwelling, based upon MHCLG figures from 2015. MHCLG have published a more recent estimate of £1,400 per dwelling⁹ to meet this enhanced standard. Given the Authority are seeking 67% of dwelling to be constructed at this standard, this under-estimate would have a material impact on viability.

Energy – ES1

- 5.22 The viability evidence indicates that the Government figures for Future Homes costings has been used as a baseline to achieve a 20% and 31% reduction in regulated carbon emissions, alongside another assumption for net zero – where it is expressed that a ‘mid-point’ was used. It is not clear what this mid-point is.
- 5.23 The Government’s 31% reduction is estimated in the viability assessment to add 3.1% of base construction cost. This reduction relates to regulated energy only, whereas the Authority are seeking the reduction against regulated and unregulated.
- 5.24 The report referenced from 2018 which indicates that this equates to 7-11% uplift is now somewhat dated, particularly given this area is progressing rapidly with the topic the subject of discussion at numerous local plan examinations, and more examples of enhanced construction schemes (and their associated costs) being available.

⁹ MHCLG Consultation – Raising Accessibility Standards for New Homes (September 2020)

- 5.25 In seeking to continue with this policy requirement when the evidence base clearly demonstrates that it is not viable, the Authority must provide further justification and evidence in regard to the costings associated with this policy. This should be more detailed than a basic uplift to cost: and should consider both the design costings, as per Future Homes, and then the associated costings of a residual carbon offsetting financial requirement.

District Heating

- 5.26 Paragraph 8.90 appears to indicate that this cost has not been considered; and it sets out a range of potential costs per unit from £3,000-£30,000. This is significant, and the Authority must confirm the intention of this policy to enable a robust costing exercise to be undertaken. As set out earlier in our representation, if development is required to future proof for the potential provision of district heating, it will still be necessary to define what that would mean in practice, and consider if any additions costs would be incurred.

Viability Conclusions

- 5.27 It is challenging to comment on the detailed modelling produced in the viability report – the baseline scenario no longer reflects the Pre-Submission Plan, and there are significant sensitivities tests which each generate differing outputs; and from the industry’s perspective, we have no indication on whether the Authority are suggesting that any one of these sensitivity tests are preferred, and that Modifications to the Plan are already anticipated.
- 5.28 The viability evidence does clearly conclude that the Pre-Submission Plan as drafted is not viable; and is therefore unsound.
- 5.29 The discussions around the subsequent adjustments to policies contained within the plan to make it viable should not be taking place at an Examination; and the Authority should have made a decision on their priorities informed by their own evidence base.
- 5.30 We will therefore comment on the viability evidence in detail at a later date when the Authority are able to confirm the modifications that they are seeking to ensure that the Plan is viable in accordance with their own Viability Assessment.



Conclusion and Recommendations

There are many positive components of the Draft Plan which we fully support and endorse. There are however some proposed policies and allocations which we do not support and do not consider to be 'sound'.

Of primary concern is the allocation of the New Community at Sharpness. We have a number of objections to this proposal which are detailed above. In summary, we (a) do not consider the site to be in a sustainable location for strategic scale development, nor that the measures put in place in order to enhance sustainability will be deliverable or effective; (b) have significant concerns over its deliverability; and (c) do not consider that the environmental impacts of the development have been adequately tests. Each one of these reasons is sufficient for the allocation to be deemed 'unsound'.

A demonstrably more sustainable option is to allocate the Land at Whaddon. This land is not only sustainably located with a wide range of existing services, facilities, education and employment opportunities in close proximity but it is free from environmental constraints and not reliant upon the delivery of significant and costly infrastructure. Whilst the land has been identified under Policy G2 as a location which could provide housing to meet needs arriving in Gloucester, this does not mean that a decision over its development should be deferred.

The land falls within the boundary of Stroud District Council and, as the most sustainable large-scale opportunity within the Authority's area, should form part of the spatial strategy. It has not been appropriately considered as a Reasonable Alternative in the Sustainability Appraisal.

More generally, we remain concerned about the viability of the Pre-Submission Plan – which against its own Viability Assessment is shown to be undeliverable. The Authority must review the sum of their policy requirements to ensure that they are presenting a sound plan to Examination, and we would suggest that updated viability evidence to reflect these necessary modifications is produced at that time, to ensure that those participating in the Hearings are able to address this evidence in written statements in advance.

Transport Planning

Representation to Local Plan Review - Pre-Submission Consultation

1. INTRODUCTION

1.1 Neil Brant Consulting (NBC) has been appointed by L&Q Estates Ltd. (L&Q) to provide advice on matters of highways and transportation in respect of the Local Plan Review Pre-Submission Consultation.

2. SCOPE AND PURPOSE

2.1 This note considers matters of highways and transportation in respect of relative levels of sustainable travel that could reasonably be expected when comparing remote site allocations to those on the urban fringe. In particular, the hierarchy of sustainability, whereby minimising the need for new infrastructure by the location of development in locations that minimise distances travelled to key destinations and have existing infrastructure and services already in place, is applied.

3. SITE ALLOCATIONS – TRAVEL DISTANCES OF BERKELEY CLUSTER vs GLOUCESTER FRINGE

3.1 It is overarching Government Policy and Guidance that in order to influence travel behaviour, it is imperative that the future needs of a development or community are considered and captured through good quality planning before infrastructure is put in place. Opportunities must be taken within the plan making process to make cycling, walking and public transport the modes of choice. These modes must be made more convenient for the majority of journeys than car usage, in order to promote genuine modal shift and truly sustainable communities. One significant generator of travel, that cannot be fully contained within any single development or settlement, is employment.

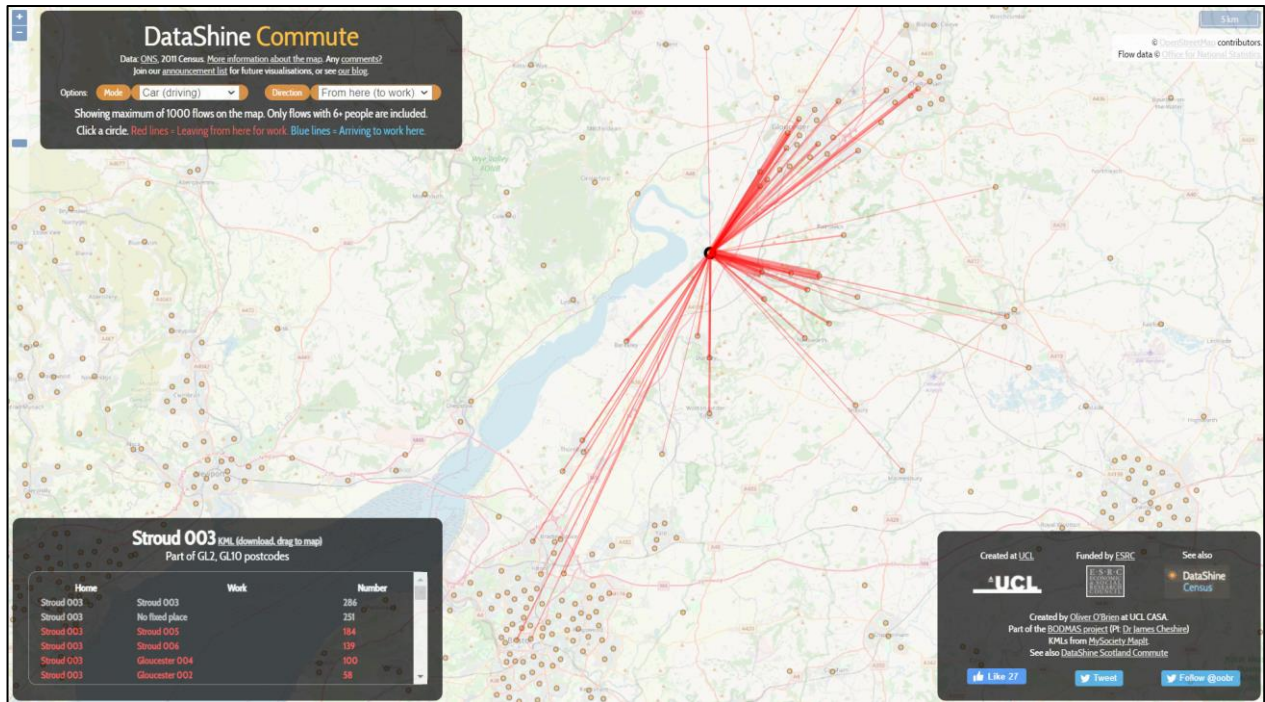
3.2 There is a direct relationship between distance travelled and propensity to take-up of sustainable travel modes and therefore site allocations in locations further away from key employment, when compared to those within or on the edge of the major settlements in the district, will result in trip lengths being required over greater distances. Therefore, the propensity to take up sustainable travel will be negatively impacted at the remote sites and increasing the scale of intervention necessary to make up for this comparative poor performance.

3.3 The scale and importance of travel to work, as a comparative exercise assessing journey lengths, can be illustrated when comparing ONS Census 'travel to work' data via the DataShine software¹. In the four figures

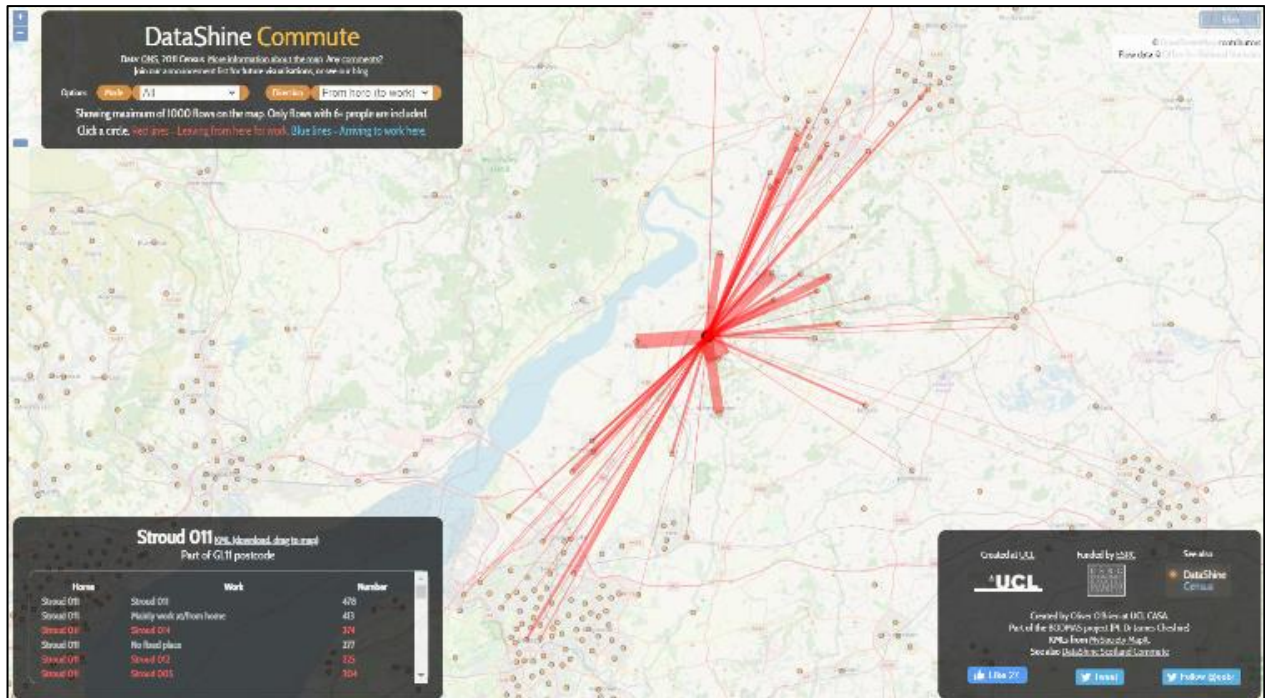
¹ DataShine, *Interactive mapping for large, open demographic data sets*, *Journal of Maps* (Oliver O'Brien & James Cheshire, 2016)

below, the out-commute of the Census MSOAs relevant to the Berkeley Cluster (Stroud 003, Stroud 011 & Stroud 012) can be compared to the Gloucester Fringe (Gloucester 012).

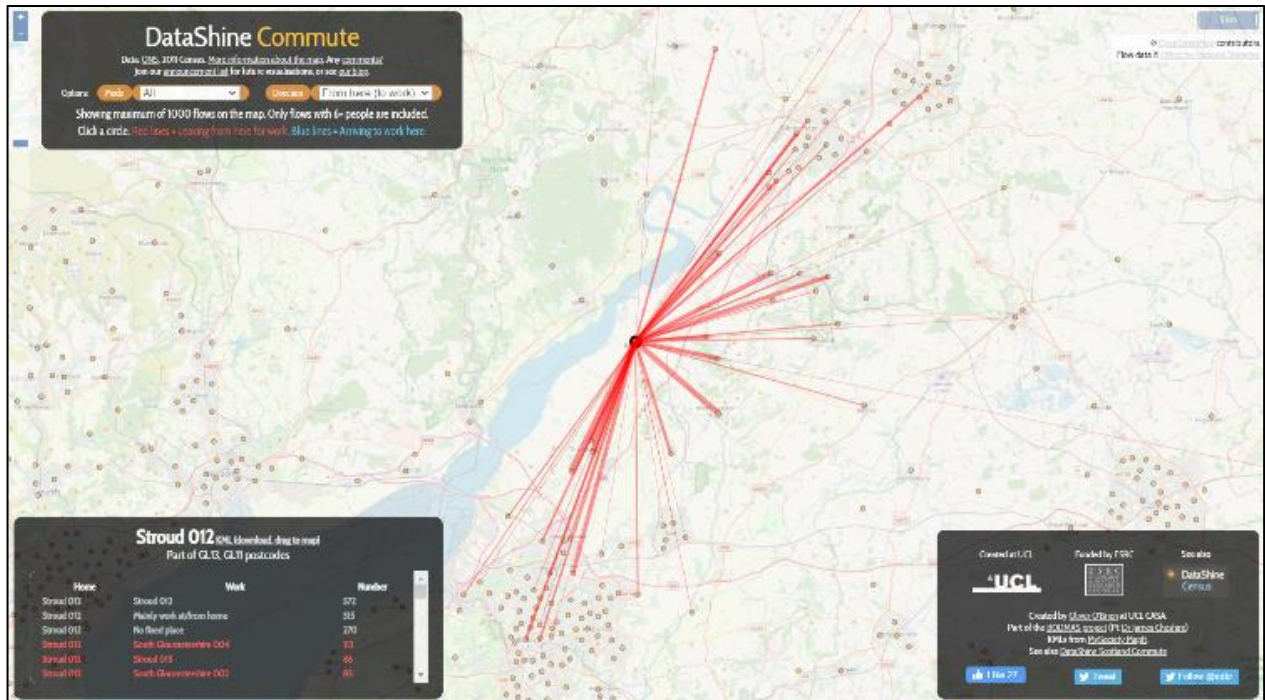
Frampton on Severn (Stroud 003) - Out Commute



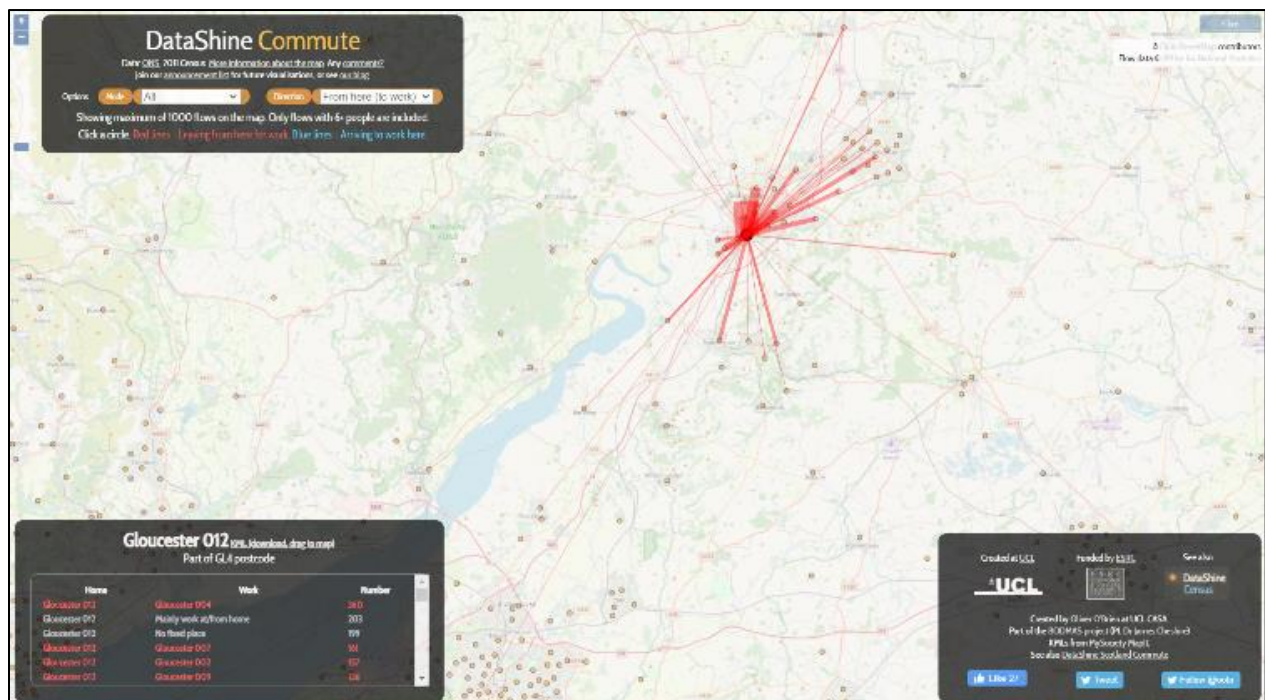
Cam (Stroud 011) - Out Commute



Berkeley (Stroud 012) - Out Commute



Whaddon (Gloucester 012) - Out Commute



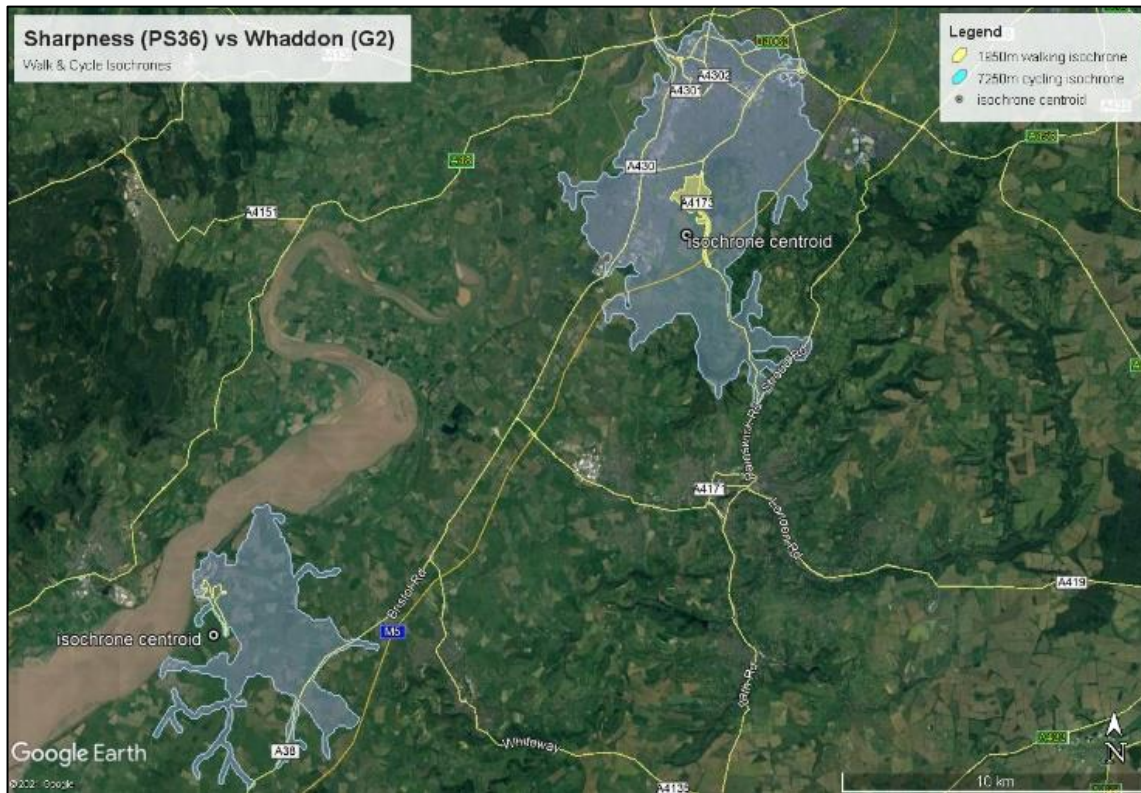
3.4 It is quite evident from the ONS data that the lengths over which travel to work occurs from the Gloucester urban fringe is significantly less, and over a significantly more compact area, than that for sites in outlying areas.

- 3.5 As such, the outlying sites forming parts of the Berkeley Cluster, such as Wisloe and Sharpness, will be starting from a significantly lower baseline position in terms of existing sustainable travel infrastructure, services and opportunities, and therefore the scale of necessary intervention, when compared to more urban sites, will be that much greater and more challenging. These outlying sites are therefore likely to return less value for the investment made, and this is stated in the context of the sustainable travel hierarchy that seeks best value with a focus on minimising carbon emission at the construction stage by the use and adaption of existing infrastructure and services before providing new.
- 3.6 The location of sites relative to all key trip destinations influence a significant part of daily travel needs and behaviour. Trip length, alongside the purpose of the trip, determine the choice of travel mode. Guidance and best practice² advises that the preferred maximum walking distance for commuting journeys is 2km and that approximately 80% of walk journeys in urban areas are less than 1.6km.
- 3.7 A published study³ established that the distance up to which people would ordinarily walk as being the 85%ile and that this should be used as the defining criteria for accessibility of new development, as summarised below:
- Walking - All journey purposes catchment for residential development – 1,950m
 - Cycling – All journey purposes catchment for residential development – 7,250m
- 3.8 New development and settlements within or on the fringe of existing urban areas will clearly benefit from far greater catchment of everyday amenities and facilities within walking and cycling limits and thereby achieve far greater levels of sustainable travel. This is illustrated in the two figures over the page, where the walk and cycle catchment of the Berkeley Cluster allocations at Sharpness (PS36) and Wisloe (PS37), both outside and far from significant urban areas, are compared to Whaddon (G2) on the fringe of Gloucester.
- 3.9 Whaddon (G2) covers an active travel catchment of 52.5sq.km, in comparison to Sharpness (PS36) 20.9sq.km and Wisloe (PS37) 41.3sq.km. Not only are the physical catchments areas significantly lower for the Sharpness and Wisloe allocations, but their content covers mainly rural undeveloped areas with few significant trip destinations, as opposed to Whaddon covering a large part of Gloucester and its significant number of primary trip destinations serving the district.
- 3.10 This exercise highlights the significant difference in baseline conditions between urban fringe sites (Whaddon G2) and rural settlement sites (Sharpness PS36 and Wisloe PS37), and the not insubstantial increase in extent of gap that must be bridged to bring the latter sites anywhere near as sustainable. This point is made reiterating the apex of the sustainability paradigm, that of making best use of existing infrastructure and services, before moving to the carbon production associated with building new.

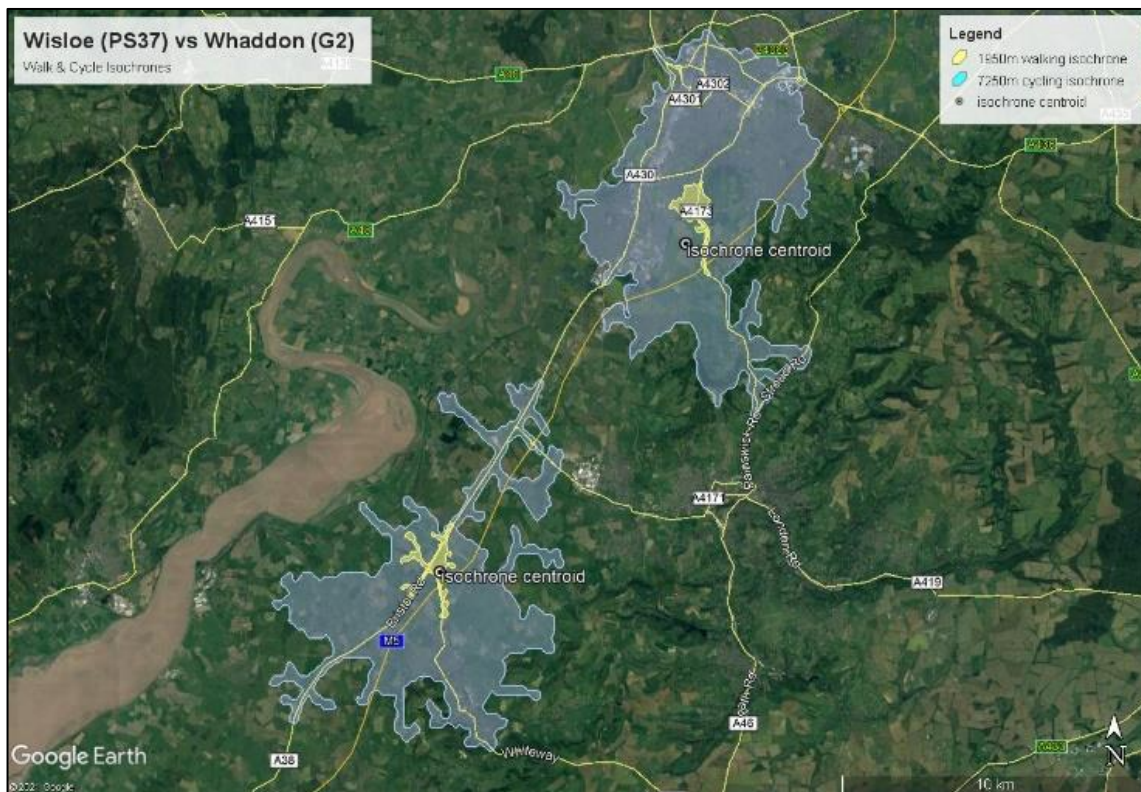
² Institution of Highways & Transportation, *Guidelines for Providing for Journeys on Foot*, IHT 2000,

³ Local Transport Today: *WYG: How Far Do People Walk* (LTT, 13-26th October 2017)

Sharpness (PS36) vs Whaddon (G2) - Active Travel Isochrone Catchment Areas



Wisloe (PS37) vs Whaddon (G2) - Active Travel Isochrone Catchment Areas



- 3.11 The sustainable transport strategy for development at Sharpness (PS36) is hinged on the opening of a new station on the current freight-only branch line. As has been played out over recent decades at Portishead, the opening of a station and re-configuring of a freight line for passenger service is fraught with difficulties – technical & commercial.
- 3.12 Portishead has a population of c25,000 residents, compared to maybe c5,800 residents (2,400 dwellings) within the plan period. The relationship of Portishead to the rail connected employment areas of Bristol is far greater than that from Sharpness to its own rail connected employment areas. Yet, the viability and deliverability of a passenger rail connection at Portishead has floundered for decades and has yet to be realised. On this basis, the short to medium term likelihood of a passenger rail connection from Sharpness cannot be seen to be a certain prospect and in the long term, the viability of such a service serving a community of only c12,000 residents is to be established in any detail.
- 3.13 The sustainable transport strategy for PS36 acknowledges the need for the development to provide direct and attractive bus services to key destinations, including Bristol and Gloucester. The comparable journey time and benefit of bus travel to Bristol and Gloucester (in the absence of being rail connected), compared to private car, would significantly challenge the public transport mode uptake.
- 3.14 Ultimately, it is evident that the location of PS37, remote from employment areas and the uncertain prospect of rail connectivity, plays against any realistic large scale mode shift to sustainable travel and therefore it is inevitable that it will become a car based dormitory settlement with commensurate demands and impacts on highway infrastructure and the environment.
- 3.15 In comparison, development at Whaddon (G2) on the Gloucester urban fringe, benefits from immediate and established active travel access to the greater part of the city and its key trips destinations within an established cyclable distance. Public transport provision would largely be over short journey lengths across the city as illustrated by the compact commute patterns in the ONS diagram above. New and enhanced transport infrastructure and services will largely be formed as an extension and progression of those already provided on the Stroud to Gloucester corridor and across parts of Gloucester. This approach demonstrates a site location that is able to deliver sustainability at the apex of the paradigm. i.e. make best use and re-purposing existing. The viability of the sustainable transport provision at Whaddon is many fold greater than that at Sharpness and Wisloe, by virtue of its cost effective scale and propensity for sustainable mode uptake.

4. SUSTAINABLE TRANSPORT STRATEGY (2021)

- 4.1 The Sustainable Transport Strategy (STS) seeks to identify a comprehensive and joined up approach to travel for the district, which would be delivered collectively by allocated sites. Therefore, whilst the strategy is district wide, its implementation is on a site by site basis, and the requirements and interventions of each site is established on its apparent needs. This approach is supported as being a pragmatic, comprehensive

- and joined up way of establishing the overarching and individual travel requirements and interventions of allocations.
- 4.2 The 'long list' of interventions has been subject to some limited independent appraisal so as to reduce the size to a 'short list', and to also rank order them into some order of priority when assessed against the seven core objectives of the strategy.
- 4.3 It is noted that the appraisal at this stage has not included for any form of indicative or prescribed Cost Benefit Analysis, and therefore the short list can be considered to be on the side of aspirational and visionary, and yet to be subject to any consideration of viability, in the context of application at site allocations.
- 4.4 No weighting or hierarchy has been applied to the seven objectives of the strategy and therefore they are assessed on an even basis, whilst in terms of sustainable travel such a hierarchy exists and is important. Whilst the basic content and intent of the objectives is reasonable, some are not as fully developed as they could be, for instance:
- 4.5 Protect and extend existing active travel infrastructure – given that using, repurposing and extending existing infrastructure is towards the apex of the sustainability paradigm, this principle should be an objective for all interventions, not just sustainable travel.
- 4.6 The District's ambition of becoming carbon neutral (SO5: Climate Change & DCP1: Carbon Neutrality) is only mentioned in terms of the innovation and technology objective, whereas it would be more appropriate to be the headline objective overarching all of the other objectives.
- 4.7 In summary of the rank ordering of the interventions, as it stands, it has been a relatively crude and preliminary process that does not address the viability, cost benefit performance or overarching carbon objectives (SO5 & DCP1) of the District. However, potentially a next stage would introduce rank ordering in terms of viability, benefit and carbon neutrality. This would enable a view to be taken on the performance and deliverability of the STS by allocation sites.
- 4.8 As it stands, the rank ordering gives a score range of -21 to +21, whereby scores at 13 above were deemed favourable, 7 to 12 intermediate and 6 and below poor. Those that scored 6 or below were removed from the 'short list'.
- 4.9 Whilst the list of interventions is a strategy to deliver sustainable development, it is perverse that it is largely set out as a list of interventions formed around the highway network. The strategy and interventions would benefit from being set out as a true hierarchy of interventions informing the site selection and masterplanning of allocations, from concept through to delivery, generally as follows:
- negating the need to travel (technology, home working etc.);
 - minimising the distance over which travel is required (work-hubs, mixed land-uses, local amenities and facilities, proximity to key travel destinations etc.);

- prioritising active travel design in the masterplanning of allocations (design around car free space, safe, convenient, direct and high quality active travel routes etc.);
- establishing commercially viable public transport services from allocations to key travel destinations (prioritising schemes with the highest level of cost benefit and achieving commercial viability and reduced risk);
- off-site active travel and public infrastructure increasing the attractiveness of their use (walk and cyclelanes, crossings, junction improvements reducing weight times and improved journey time reliability for public transport);
- safeguarding roads safety and environmental issues caused by the residual traffic impact (road improvements).

4.10 At Appendix E of the STS, the intervention table identifies target mode shifts to be achieved by each intervention at each development. As set out, the target mode shifts appear to be somewhat arbitrary as they do not correlate the proportion of a trip purpose to the mode shift target nor take in to account any baseline conditions. i.e. if 15% of residents travel to employment at Zone A and the mode shift target of that journey is an additional 20% to travel by bus, the mode target would be 5.25% (15% x 20%). To apply global 10%, 20% 30% targets without any weighting on the trip proportion for that purpose or route should be reconsidered.

4.11 Appendix E also sets out, as a common requirement of all allocation sites, a range of internalisation of travel, of 6% to 10%. This range is considered to be far below that already achievable by comprehensive mixed-use development and with changing working behaviour post-covid, even a small degree of part-time home working will have a material effect on overall rates of internalisation. Modelling of mixed-use comprehensive development elsewhere in the south and west suggests that a range of 10% to 25% (peak hour) is currently achievable and targets should look to see this increase in line with increased home and remote working practices.

4.12 In respect of the stated interventions and associated mode shift adjustments and targets at allocation sites, it appears that only selective interventions are identified, and which do not take in to account the relative mode splits of each site. i.e. urban fringe sites would achieve a higher mode uptake of cycling than say Wisloe and Sharpness, for instance, by virtue of have a far greater number of trip destinations being within reasonable cycling distance. These baseline mode splits, and variable opportunities for mode shift, should be reflected in the interventions and targets for each allocation site, so as to understand their relative sustainability from an even position. This approach should be used to assess the relative performance of travel sustainability of each site, so as to inform on the Council's Carbon objectives and prioritising of schemes coming forward.

4.13 Land at Whaddon (G2) – taking into consideration the above, it is suggested that the upper quartile baseline sustainable travel mode splits are recognised in the STS covering all sustainable modes of travel. In the

same way, the middle quartile level of internalisation of travel should be recognised and reflected in the STS.

- 4.14 It is suggested that intervention targets should be set for Whaddon (G2) for all sustainable modes of travel and relative to the opportunity for mode shift and the baseline conditions, and thereby be in the middle to upper quartile range of target figures when compared to all sites across the district.
- 4.15 At this stage, the target figures should be expressed as indicative ranges and final figures clearly stated as being informed by detailed assessment on a site-by-site basis by the developer and to be agreed with SDC, GCC and HE.
- 4.16 Land at Sharpness (PS36) – it is somewhat implausible and un-evidenced that a site remote from key employment areas would achieve a higher mode shift uptake than an urban fringe site, given the interventions recommended. The mode shift figures should be set based on a specific assessment of the site, taking into account travel demand to each key destination and realistic levels of mode split uptake.
- 4.17 Land at Wisloe (PS37) – again, it is implausible and un-evidenced that a site located beyond reasonable walking distance of any significant employment and services would achieve a higher mode shift uptake to walking than an urban fringe site, where no similar mode adjustment has been acknowledged. The mode shift figures should be set based on a specific assessment of the site, taking into account travel demand to each key destination and realistic levels of mode split uptake.
- 4.18 The rank ordering of interventions by ‘scale of cost’ is too crude a measure and fails to take account of value and return, and therefore it should be replaced by a ‘scale of cost benefit’ that each would present.

5. INFRASTRUCTURE DELIVERY PLAN (2021)

- 5.1 In respect of the re-opening of the Sharpness rail line to passenger services, the IDP acknowledges and reports on the:

‘very limited GVA impact for a very costly new piece of infrastructure’

associated with the scheme as determined in the Gloucester Rail Investment Strategy, by Network Rail and GCC.

- 5.2 Given these not insignificant concerns, the feasibility of rail connectivity of Sharpness allocations, and thereby their ability to achieve even remotely acceptable levels of sustainable travel, has to be seriously questioned.

6. TRAFFIC FORECASTING REPORT: STROUD LOCAL PLAN TRAFFIC MODELLING (MARCH 2021)

- 6.1 The traffic modelling exercise presents the cumulative effects of the traffic impacts of the draft allocated sites taking into consideration the interventions of the STS and IDP. As such, it is a single pass assessment for the purposes of providing some context and assurance on the overall soundness of the Local Plan and

its supporting STS and IDP. Given our stated issues with the STS target assumptions, the modelling at this stage should be considered to be preliminary and a ‘broad brush’ assessment. However, it is our view that it serves its purpose at this stage and enables the Plan to move forward with some confidence, but mindful that individual allocations and all allocations in a cumulative fashion, should be assessed using scheme specific STS interventions and targets so as to realistically report on the tempering of traffic impacts and provide a greater level of detail on need for IDP schemes.

6.2 In summary, before further modelling work is undertaken, allocation specific STS targets should be determined using technical analysis of travel behaviour for all modes. Then, the STS interventions should be included in the modelling of individual allocations to identify the individual proportional reliance of allocations on: IDP schemes, points at which IDP schemes will be triggered as being required, and thereby a fuller understanding of the feasibility and delivery of allocations. The modelling work should also seek to identify detailed s106 contributions of allocations to IDP schemes.

7. CORE POLICIES: TRAVEL & TRANSPORT CP13

7.1 As has been found elsewhere in the local plan review, Core Policy CP13 omits to acknowledge that the starting point for sustainable travel is minimising the need to travel, and that climate change and carbon emission policy should prioritise re-use of existing infrastructure.

7.2 As it stands, CP13 states:

i) be located where there are, or will be, at the time of development, choices in the mode of transport available and which minimise the distance people

7.3 This element of the policy is inconsistent with Strategic Objective SO5 on Climate Change and Core Policy DCP1 on Carbon Neutrality as it applies equal weighting to sites where new infrastructure is required (with its embedded carbon in the construction process) compared to those benefitting from existing infrastructure and services that will have significantly less carbon production.

7.4 This element of Core Policy CP13 is also contrary to that stated within Delivery Policy EI12, which states:

Development should be located in areas which are already well served by public transport and have access to a range of local facilities within walking and cycling distance.

7.5 EI12 recognises the significance of sites that are already well provided for with sustainable transport, and that weight should be applied in their favour.

7.6 The policy should be suitably amended to recognise that in the first instance development should proceed at locations where the need for the construction of new infrastructure is minimised, and therefore carbon production also minimised, and that site locations be rank ordered with regards to those that will contribute least to climate change (embedded carbon in construction) associated with large scale infrastructure projects, such as railways and strategic road network improvements.