



STROUD LOCAL PLAN REVIEW

RESPONSE TO SLC RAIL'S REVIEW OF STANTEC'S TRANSPORT REPORT DATED FEBRUARY 2023 IN RESPECT OF THE SHARPNESS STRATEGIC ALLOCATION (PS36)

1. PFA Consulting has been instructed by Robert Hitchins Limited (RHL) to respond to SLC Rail's review (the SLC Rail Review) (ref 904) of Stantec's Transport Report in response to questions raised by Gloucestershire County Council (the Stantec Transport Report) (ref SG23) in respect of Strategic Site Allocation Policy PS36 Sharpness New Settlement. The Stantec Transport Report is dated February 2023 and the SLC Rail Review is dated March 2023.
2. Policy PS36 Sharpness New Settlement criterion 19 requires a new railway station and enhancements to the Sharpness branch line and contributions to support a regular passenger service to Gloucester. The SLC Rail Review speaks for itself in confirming that there is no certainty and a very high degree of risk that the anticipated railway enhancements may never be delivered. The SLC Rail Review has identified:
 - deficiencies in the submission;
 - uncertainty that questions the overall viability of the rail project;
 - inconsistency in the costings;
 - rolling stock which cannot be used for the intended service;
 - no mention of discussions with any Train Operating Company; and
 - flawed logic behind the argument of potential journey numbers for Sharpness Vale, which is therefore unconvincing.
3. Without the passenger rail service, the focus turns to bus public transport and express bus/coach services.
4. The Council's Sustainable Transport Strategy (STS) (ref EB108) identifies key issues for a new settlement at Sharpness and states at page 29:

“Sharpness has an issue of relative remoteness, particularly in public transport terms... There is a lack of regular public bus services” (our emphasis)
5. The Council's Infrastructure Delivery Plan (ref EB69) states at page 27:

“The proposed allocations at PS34 Sharpness Docks and PS36 New settlement at Sharpness have an issue of relative remoteness, particularly in public transport terms. This increases demand for private car usage.” (our emphasis)
6. As set out in previous representations (Pegasus and PFA on behalf of RHL – Reg 19 reps and Hearing Statements to Matter 5 (ref 879)), the PS36 Sharpness New Settlement allocation is in an unsustainable location some significant distance from the main movement corridors as defined in the Council's STS and major centres of employment. There is a lack of regular bus public transport as a result of the relative remoteness of Sharpness.

7. New and bespoke bus/coach services are proposed by the promoter of PS36 Sharpness New Settlement to move people to workplace destinations. The nearest major centres of employment being Bristol, Gloucester, Stonehouse and Stroud. These movements would therefore be split in multiple directions to destinations that are distant from Sharpness working against the bus/coach proposals.
8. Gloucestershire County Council and Stagecoach's representations (ref 904 & 952) have set out their concerns about the promoter's overly ambitious bus journey times and estimated modal share values which they consider are not reflective of typical transport demand in the County - NB the promoter anticipates that over 10 times the number of trips could be made by bus than might be expected based on surveys, without compelling supporting evidence as far as we can see. Stagecoach has pointed out in earlier representations that the bespoke transport proposals are focused on, and reliant upon demand from the development itself, the costs would be exceptionally elevated by the distances involved concluding that the economics are utterly compromised. Stagecoach refutes the contention that meaningfully attractive and effective local bus services can ever be delivered within realistic resources and costs to this location [Sharpness].
9. If the bus/coach services were attempted, they would not benefit in the same way from the bus advantage that is proposed for the commercial bus network on the main movement corridors as defined by the Council's Sustainable Transport Strategy (cf Stagecoach's Consolidated Public Transport Proposed Measures and Opportunities plan and supporting letter and spreadsheets ref SLP-AP-001). Therefore it is considered that bus/coach services would be very unlikely to be able to compete with the private car.
10. The Stantec Transport Report sets out a discussion of Technology and Innovation including Mobility-as-a-Service (MaaS) and Demand Responsive Transport (DRT). MaaS trials are underway but the commercial viability is as yet unproven, as is the impact on personal car ownership. A critical mass needs to be gained in the same way that it does for public transport and DRT which can complement a mainstream public transport network, which does not exist at Sharpness.
11. In summary, the SLC Rail Review found that there is a very high degree of risk that the rail enhancements, which are required by Policy PS36 Sharpness New Settlement criterion 19, may never be delivered; the proposed bus/coach services would be unlikely to be viable or able to compete with the private car; and the viability of the Technology and Innovation referred to in the Stantec Transport Report in respect of MaaS is unproven. For these reasons, it is considered highly likely that the private car would prevail for travel to/from the PS36 Sharpness New Settlement allocation.