

Stroud District Local Plan (2020-2040)
STRATEGIC TRANSPORT MATTERS STATEMENT OF COMMON GROUND

between

National Highways
Stroud District Council

21st February 2023

1. Introduction and background

- 1.1 This Statement of Common Ground (SoCG) covering strategic transport matters has been prepared at the submission of the Stroud District Local Plan (the ‘Local Plan’) (2020-2040) and following the Regulation 19 Consultation for the Pre-Submission Draft Local Plan (Examination Library Reference Number CD1). The SoCG has been signed by Stroud District Council and National Highways (formerly Highways England), referred to hereafter as ‘the parties’.

2. Strategic matters that are agreed

Context and actions taken to date

- 2.1 The National Planning Policy Framework requires transport issues to be considered from the earliest stages of plan-making. The planning system should actively manage patterns of growth to realise opportunities from existing and proposed transport infrastructure, to promote walking, cycling and public transport and to address impacts on transport networks and the environmental impacts of traffic and transport infrastructure. “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (NPPF, para. 104-105).
- 2.2 Transport assessment work on the Local Plan has been carried out at a number of key stages in the plan making process and has involved partnership working with transport and planning authorities and key stakeholders. The principal transport evidence includes:
- EB59 Strategy Options Transport Discussion Paper (July 2018)
 - EB108 Sustainable Transport Strategy Addendum (May 2022)
 - EB98 Traffic Forecasting Report Addendum (TFR) (April 2022)
 - EB110 Infrastructure Delivery Plan Addendum Report (IDP) (August 2022)
 - EB109 Transport Funding and Delivery plan (TF&DP) (July 2022)
- 2.3 The principal duty to co-operate issue relates to working in partnership with transport, planning authorities, developers and National Highways to ensure that the transport network can accommodate the required housing and employment growth levels for Stroud District (and unmet needs arising from Gloucester City) in a sustainable manner which limits the need to travel, supports a choice of transport modes, makes the most of the existing strategic transport network and delivers mitigation where required.
- 2.4 National Highways is responsible for the safe and efficient operation of the Strategic Road Network (SRN). Particular SRN matters relate to existing and future capacity and safety issues on the M5, notably M5 Junction 12 (Gloucester fringe), M5 Junction 13 (Stonehouse/Stroud), and M5 Junction 14 (located within South Gloucestershire).

- 2.5 A Local Plan Transport Group was set up in 2017 to progress partnership working on the Local Plan transport matters. A core group of Stroud District, Gloucestershire County Council and National Highways met regularly during the plan making process to develop the above studies and to discuss key issues and potential mitigation measures. South Gloucestershire Council was invited periodically to input into the assessment work and to discuss key issues and potential mitigation measures, especially relating to impacts on and mitigation measures for M5 Junction 14.
- 2.6 The Transport Group was re-established from January 2022, including Stroud District Council, Gloucestershire County Council, South Gloucestershire Council and National Highways, meeting monthly initially then as required in the period to Examination in Public (EIP) to discuss key issues and to provide comment on draft documents prepared by Stroud District Council to support its Local Plan.
- 2.7 Since February 2022 and as part of their ongoing cooperation, National Highways and Stroud District Council have met quarterly to discuss and review wider planning matters – including the Local Plan - to ensure that understanding of likely traffic impacts on the SRN, in particular M5 Junctions 12, 13 and 14 is kept up-to-date to assist with the assessment of development proposals.
- 2.8 In November 2021, South Gloucestershire Council established an M5 Junction 14 Strategic Meeting with National Highways, Gloucestershire County Council and Stroud District Council to discuss planned growth in the vicinity of M5 Junction 14. This group typically meets every six weeks.
- 2.9 National Highways, South Gloucestershire Council, Gloucestershire County Council and Stroud District Council have also met with developer groups as required to discuss planned and speculative growth in the vicinity of M5 Junctions 12, 13 and 14.
- 2.10 National Highways and Stroud District Council have been working collaboratively and proactively and with neighbouring authorities throughout the Local Plan process to ensure that development proposals which are likely to impact on the SRN are supported by a proportionate and robust transport evidence base.
- 2.11 The parties agree that early consideration of transport matters fed into the development of the Local Plan development strategy.
- 2.12 The parties agree with the broad findings of the Strategy Options Transport Discussion Paper (2018) and in particular that a development strategy based upon a concentrated growth option is a more sustainable option than a dispersed growth option.
- 2.13 National Highways accepts the EB98 TFR Addendum (2022) assessment methodology and findings, and the EB108 STS Addendum (2022).
- 2.14 National Highways in its Reg.19 representations to the Local Plan has welcomed the identification of necessary improvements to SRN junctions as set out within the TFR Addendum and IDP.

- 2.15 In summary, the parties agree that Stroud District Council, in preparing the Local Plan (2020-2040), has engaged proactively and positively with National Highways on strategic transport matters through the Duty to Cooperate.

Commitments for future work and collaboration

- 2.16 National Highways has requested in its Reg.19 representations to the Local Plan that the need for the necessary infrastructure should be set out more explicitly in both individual allocation policies where necessary and in an over-arching infrastructure policy. This would provide a clear policy linkage between the Infrastructure Delivery Plan and the Local Plan, and provide assurance that the authority is committed to bringing the necessary infrastructure forward in line with the proposed growth aspirations. National Highways requests that the requirement for strategic development sites to be supported by a transport assessment and travel plan should also be clearly signposted in the relevant site allocation policy.
- 2.17 Stroud District Council acknowledges the need for the Local Plan to set out clearly the necessary infrastructure required and provide a policy basis to secure it. The Council also agrees that there should be clarity on the transport assessment work and travel plans required from developers.
- 2.18 The parties agree to work together through the examination process to resolve the outstanding matters raised by National Highways by agreeing appropriate modifications to the Plan where necessary.
- 2.19 The parties agree to engage proactively and positively on ongoing strategic transport matters relating to the Local Plan.
- 2.20 The parties agree to work together where possible to develop any further transport evidence required to accompany the Local Plan during examination.
- 2.21 The parties agree to work together and with South Gloucestershire Council, Gloucestershire County Council and developers, to determine appropriate infrastructure at M5 Junctions 12, 13 and 14, safeguard land to enable the interventions, detail the triggers and timing for interventions, and devise a funding and delivery strategy for identified improvements.
- 2.22 The parties agree to work together to implement the transport policies contained within the Local Plan (2020 to 2040) when adopted.
- 2.23 The parties agree to continue to ensure they engage from the outset of new development proposals, and throughout the pre-application process, to ensure that development proposals likely to impact on the SRN present a robust transport evidence base.

3. Matters that are not agreed

- 3.1 There are five key matters that are unresolved at the current time.

A. Local Plan Policies

- 3.2 National Highways has raised concerns regarding the wording of various policies and site allocations on transport grounds set out within its Reg.19 representation. National Highways has put forward recommendations to resolve these matters, and Stroud District Council

wishes to resolve these matters through agreeing appropriate modifications through the examination process where necessary.

B. SRN Scheme Identification

- 3.3 Strategic modelling work undertaken in the TFR identifies the scale of the scheme required at M5 Junction 12. This is supported by historic work undertaken by National Highways in this location, which also suggests that an upgrade the scale of that identified in the TFR is required to mitigate cumulative growth. However, National Highways is concerned that local junction modelling of a potential improvement at M5 Junction 12 and a scheme drawing has not been produced. This therefore adds to the uncertainty about the cost estimate, land requirements, the timing of delivery and the overall viability of this scheme.

C. SRN Scheme Assessment

- 3.4 National Highways is concerned that development allocations in neighbouring local planning authorities (i.e. Gloucester, Cheltenham, Tewkesbury and South Gloucestershire) have not yet been determined because it creates uncertainty in the overall future traffic demands at M5 Junctions 12 and 14. However it agrees that Stroud District Council has demonstrated through strategic traffic modelling that improvements to SRN junctions, i.e. M5 Junctions 12 and 14, are likely to provide solutions to the issues caused by increased traffic from the additional development in the Local Plan and from surrounding LPAs. However, there remains a need to indicate that proposed improvements are viable and ultimately deliverable and that the proposed mitigation can be considered justified and effective as per NPPF paragraph 35.
- 3.5 National Highways is concerned that the TF&DP is not clear 'when' improvements at M5 Junctions 12 and 14 will be required before the end of the Local Plan period (2040), and who would decide the timing of their delivery. National Highways anticipates that the improvements would be required early in the Local Plan period.

D. Estimated SRN Schemes Cost and Assumptions

- 3.6 National Highways does not consider that the estimated scheme costs at M5 Junctions 12 and 14 are at current market value and considers that this is a risk to the deliverability of the Local Plan because if a scheme is undervalued it cannot be delivered at the figure identified. In its current form the costings in the TF&DP raise deliverability and viability concerns to National Highways.
- 3.7 National Highways is concerned that land ownership details have not been provided within the associated costings at M5 Junctions 12 and 14 and therefore it is unclear how this has been accounted for in the scheme calculations.
- 3.8 National Highways also advises that the structures at M5 Junctions 12 and 14 may need to be replaced, rather than maintained, to accommodate the Local Plan schemes. The costing assumptions made in the Local Plan have assumed that existing structures could be retained. However, this may not be the case and would result in significantly higher scheme costs if the structures need to be replaced.


E. Funding and Delivery

- 3.9 National Highways has raised concerns regarding the Transport Funding and Delivery Plan (TF&DP). National Highways supports the principles behind the TF&DP, but is not satisfied that the funding and delivery plan is effective (as per NPPF paragraph 35) given its reliance on cumulative third party (development) contributions and the significant proportion of the costs being sought from developments in neighbouring LPAs.
- 3.10 In addition, the TF&DP does not identify a delivery mechanism nor any contingency should funding from any development not become available or allocations vary at the adoption stage. This could mean that an SRN scheme and therefore the SDLP and/or other development with an impact on the SRN may become undeliverable, as the resultant impact on the SRN would be unacceptable.
- 3.11 If a reliable and realistic funding source is not identified, National Highways considers that it could be in a position where its response to developments within the Local Plan is either a recommendation of refusal or subject to Grampian conditions, which may lead to an increase in speculative development and minor schemes brought to accommodate individual development impacts rather than a cumulative approach to ensure the delivery of the most appropriate infrastructure required.
- 3.12 National Highways is concerned that the scheme promoters and who would underwrite any financial risks for improvements at M5 Junctions 12 and 14 have not been identified.
- 3.13 The parties commit to continued working in collaboration with neighbouring authorities to explore funding opportunities and delivery routes for necessary SRN infrastructure improvements, and to collaborate on further testing early in the Local Plan period to feed into a phasing plan to indicate when improvements at M5 Junctions 12 and 14 will be required.

4. Signatories

Rebecca Edmond
Signed on behalf of National Highways


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Signed on behalf of Stroud District Council

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Dated
21/02/23
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