

Consultation Summary M5 Junctions 12 and 14 Scenarios

Background

Stroud District Council (SDC) submitted the draft Local Plan to the Planning Inspectorate for Examination in October 2021. Hearing sessions commenced in March 2023 and were paused in June 2023 to allow a summer break. The majority of the hearing sessions have already been held and have covered all strategic and local site allocations and most of the policies set out in the draft Local Plan. Details of the Examination and the Examination Library are available on the Local Plan Examination webpage.

During the Examination summer break, the Inspectors wrote to the Council on 4 August 2023, ID-010 in the Examination Library, setting out concerns with three areas of soundness:

1. The capacity of the Strategic Road Network (SRN), specifically the capacity of M5 Junctions 12 and 14 to accommodate proposed housing growth;
2. The proposed passenger train service and bespoke Mobility as a Service transport scheme (MaaS) at Strategic Site Allocation PS36 Sharpness New settlement on the grounds of viability and deliverability.
3. The provision of the pedestrian and cycle bridge over the M5 motorway at Strategic Site Allocation PS37 Wisloe New settlement on the grounds of viability and deliverability.

Additional information and a commitment to address the Inspectors' specific viability and deliverability concerns relating to Strategic Site Allocations PS36 Sharpness new settlement and PS37 Wisloe new settlement were submitted to the Inspectors in September 2023.

A Joint Action Plan with National Highways (NH), Gloucestershire County Council (GCC) and South Gloucestershire Council (SGC) to address issues relating to the capacity of the SRN was submitted to the Inspectors on 30 November 2023.

A further letter from the Inspectors dated 5 February 2024, ID-015 in the Examination Library, granted a pause in the Examination until December 2024 to allow the work set out in the Joint Action Plan and additional work relating to PS36 and PS37 to be completed and a six-week period of public consultation on the outcomes of the workstreams to be carried out.

Summary of representations:

The outcomes of this additional work were published for consultation between Monday 9 September to 5pm on Wednesday 23 October 2024. The representations will be published in full alongside this summary document, but as requested by the Inspectors a summary of comments and responses is available below.

Q. Do you have any comments on the junction scenarios impacting housing delivery presented in EB135 M5 Junctions 12 and 14 scenarios?

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
002	Nexus Planning on behalf of Crest Nicholson Operations Site promoter part Strategic site allocation PS30	<p>There is no certainty that costed schemes for the motorway junctions are finalised, and funding sources are identified and secured; accordingly, an unconstrained supply scenario(s) is not relevant. The table includes delivery contributions beyond the plan period (post-2040), which are not relevant to the soundness considerations arising.</p> <p>Consequently, only scenarios that consider nil supply from sites that have an impact on J.12 and J.14 of the M5, and (to a lesser extent subject to testing of the evidence), scenarios involving up to 1,000 dwellings at Sharpness/other locations affecting J.14 of the M5 are relevant. It should be noted that the scenarios involving 1,000 dwellings from Sharpness or from other sites impacting on J.14</p>	EB135 sets out the latest unconstrained delivery trajectory provided by promoters of each strategic site and provides the wider context for LP housing delivery with and without SRN improvements at M5 J12 & J14 shown in alternative scenarios.

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		<p>are untested and should therefore be treated with significant caution. For the purposes of robustness, in this context, it is reasonable to assume that the SRN constraint is fixed.</p>	
		<p>Excluding sites affecting the SRN means only 63% (less than two thirds) of the Local Plan housing requirement can be delivered pursuant to the spatial strategy submitted for examination, during the plan period. This means the Plan cannot be delivered in accordance with the proposed spatial strategy, which must lead to the conclusion that the spatial strategy is unsound. The Inspectors' advice in this regard (ID-013) is clear: removal of undeliverable sites from the Plan is an option that is available (ID-014) but would likely result in a significant change to the plan requiring modification, consultation, and therefore further delay, which the Inspectors advise is not tenable (ID-010).</p>	<p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>
003	McLoughlin Planning on behalf of Seven Homes	SevenHomes has reservations about the housing trajectory and the robustness of the assumptions made in it regarding the	See response to same comment in - Consultation Summary Housing Delivery

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	Site promoter Local site allocation PS44	deliverability of the strategic sites within the Plan period.	
004	McLoughlin Planning on behalf of Avant Homes Site promoter alternative local site allocation, Land at Dursley	SevenHomes has reservations about the housing trajectory and the robustness of the assumptions made in it regarding the deliverability of the strategic sites within the Plan period.	See response to same comment in - Consultation Summary Housing Delivery
005 Email	Knight Frank on behalf of Harper Crewe Limited Site promoter alternative strategic site on land east of	The housing trajectory outlined in the Lichfield and Letwin Report (2018) is considered overly optimistic, indicating potential delays in projected completions that may extend beyond the planned period. The Letwin analysis evaluates build-out rates for different housing allocations, revealing that initial high delivery assumptions may not be realistic due to infrastructure requirements.	See response to same comment in - Consultation Summary Housing Delivery

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	<p data-bbox="394 347 645 411">A38 at Moreton Valence</p> <p data-bbox="394 488 663 791">The submitted rep did not follow the consultation questions set by the Council and did not provide a summary to assist the Inspectors.</p> <p data-bbox="394 817 663 1200">The Council has summarised in 250 words the comments that seem relevant to this topic, but take no responsibility for accuracy and the rep should be read in full.</p>	<p data-bbox="696 347 1366 767">Key assumptions include development timelines based on outline planning applications and average yearly build-out rates. Revised trajectories in Appendix D account for potential delays, particularly for major sites like Stonehouse North West, Hunts Grove Extension, and Sharpness Docks, where delays could reduce housing yields significantly. Concerns are raised regarding necessary improvements to Junctions 12 and 14, which could further affect timelines and delivery rates.</p> <p data-bbox="696 793 1366 1134">Moreover, the need for suitable SANG (Suitable Alternative Natural Greenspace) mitigation strategies is emphasized, as delays in SANG delivery could lead to substantial reductions in housing units, potentially exceeding 2,124 dwellings. The report highlights that without a robust SANG strategy and evidence of available projects, developments may face significant delays.</p> <p data-bbox="696 1160 1366 1347">Concerns extend to alternative sites, such as the Land at Whaddon, where the potential yield could also fall beyond the plan period. A lack of clarity around SAC (Site of Special Scientific Interest) mitigation and insufficient evidence</p>	

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		<p>regarding SANG availability raise doubts about the council's housing delivery expectations.</p> <p>To ensure the Local Plan Review (LPR) is sound, further evidence is required regarding SAC mitigation strategies, junction improvements, and funding structures.</p>	
009 Email	<p>Pegasus on behalf of Robert Hitchins Ltd</p> <p>Site promoter part Strategic site allocation PS19a and part Strategic site allocation PS24.</p> <p>Promoter of alternative strategic development site at</p>	<p>The trajectory indicates that approximately 15,164 dwellings could be delivered by the end of the plan period (2040) if all the assumptions held, against a requirement of about 12,600 dwellings, but this is reliant upon the new settlement a Sharpness delivering in year 29/30 and for Wisloe in year 26/27</p> <p>Despite the delay in the examination of the plan the housing trajectory for PS36 Sharpness is only delayed by one year from 28/29 to 29/30 and provides a higher figure for completions in 29/30 (155 dwellings) and still aims to be completed in the plan period, this is unsubstantiated given the evidence provided.</p>	<p>See response to same comment in - Consultation Summary Housing Delivery</p> <p>See response to same comment in - Consultation Summary Housing Delivery</p>

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	Grove End Farm, Whitminster	Furthermore, the expected completions for Sharpness new settlement increase by 20 dpa from year 30/31	See response to same comment in - Consultation Summary Housing Delivery
		Given the objections to both the new settlements and the long lead in times for large sites the Council should not rely on completion from these sites in the years indicated.	See response to same comment in - Consultation Summary Housing Delivery
010 Email	Carney Sweeney on behalf of Redrow Homes Site promoter Strategic site allocation G1 Land at Hardwicke	In respect of Strategic Site Allocation G1: South of Hardwicke, the trajectory presented within Appendix 1 was agreed with Stroud District Council in July 2024. The anticipated delay to the build out rates (compared to those previously presented) for the site reflect the current pause associated with the Local Plan Examination. A planning application (ref: S23/1384/OUT) for the development of up to 1350 dwellings together with a primary school and associated playing fields, a local centre, community uses, highway improvements and associated ancillary uses including open space, green infrastructure and drainage attenuation (outline all matters	Note additional information supporting delivery trajectory for G1 Land at Hardwicke

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		<p>reserved except access) for the site was submitted July 2023.</p> <p>A Planning Performance Agreement with Stroud District Council has been agreed to help progress the determination of the application.</p>	
016	Lucy Biddle	The time frame for delivering junction improvements do not align with the housing trajectory.	<p>EB135 sets out the latest unconstrained delivery trajectory provided by promoters of each strategic site and provides the wider context for LP housing delivery with and without SRN improvements at M5 J12 & J14 shown in alternative scenarios.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>
020	Carole Jeffes	Removing strategic sites affected by J12/J14 shows that the draft Local Plan cannot deliver sufficient houses	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.

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021	Virginia Jackson	Strategic sites will overload J14 and will not be permitted by National Highways (NH).	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.
		Removing Strategic sites affected by J12/J14 shows that the draft Local Plan cannot deliver sufficient houses.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
022	Steve Jackson	Strategic sites will overload J14 and will not be permitted by National Highways (NH).	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.
		Removing Strategic sites affected by J12/J14 shows that the draft Local Plan cannot deliver sufficient houses.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
024	Susan Leleu	"Strategic sites within the LP will overload junction 14 and will not be allowed by NH.	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing

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		Therefore this makes the LP undeliverable and unsound.	delivery excluding sites impacting on M5 Junctions 12 and 14. SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered
		These sites are unlikely to be delivered with the LP timescale due to the works required to meet capacity issues, therefore those sites should be removed from the LP and only those that will use junction 13 should be included as that junction does not have the capacity issues of the other two, until such time as NH consider it safe to for other LP sites to progress.	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.
		By removing the sites affected by junctions 12 and 14 then the LP cannot deliver sufficient houses.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
		For Wisloe (PS37) the option B interim proposal to share 1000 housing allocations between multiple sites does not take into account the significant costs that would need to be met in diverting the gas pipeline and construction of the motorway bridge when a smaller number of	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.

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		houses are being built. All other housing would then be delayed until 2041 when the motorway junctions are improved	
		This has a knock on effect for current residents in Dursley Road as we would see an increase in traffic until such time as the proposed changes to the whole site are made and other traffic measures are put in place	Comment noted
		We would also be living with a partly constructed area and the associated issues that come with that . at would be detrimental to our standard of living and enjoyment of our homes.	Comment noted
025	Jeremy Akers	The strategic sites are all dependent on access to motorway junctions which are at, or near, capacity. As there is no prospect of improving these until at least 2041 the Local Plan will be unable to achieve their target. As far as PS37 (Wisloe) is concerned the situation is exacerbated by potential additional traffic utilising the A38 between the developments and the inadequate motorway Junctions. Additionally the Option B proposal to share the 1000 housing allocations between multiple sites does not	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.

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		address large up front costs incurred in moving the gas pipeline and motorway footbridge.	
026	Graham Ellis	<p>I am regularly travelling south down the A38, turning left to the motorway on the B4509. In my experience most delays occur at the traffic lights at the motorway slip roads, and due to the lack of coordination between these lights and those at the A38. Therefore any alteration to the A38/B4509 junction is unlikely to support additional traffic from Sharpness or Wisloe. Why has the base traffic flow data not been updated from 2021 (which was probably affected by covid)? It appears little additional modelling has taken place. It would appear that National Highways have reservations about the A38/B4509 alteration as an interim measure. With developments at both Charfield, and Sharpness, any junction alteration would leave little scope to incorporate any development at Wisloe.</p>	<p>National Highways supplied a calibrated and validated base Vissim model for the assessment. As the Highway Authority responsible for the Strategic Road Network, they consider that this model is an accurate representation of the performance of the network.</p> <p>Due to their proximity, the A38/B4509 and M5 J14 schemes have been modelled as a network. To ensure that blocking back wouldn't occur between the junctions, and that neither junction constrains access to the network, capacity improvements to the A38/B4509 were added to the model. This has shown that there is a deliverable junction capacity improvement in this location which can accommodate all development at the end of the Local Plan period, including committed development elsewhere.</p>

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027	Sian Hill	The draft local plan will be unable to build enough houses because National Highways will not grant permission due to Junction 14 being already at capacity. The number of houses planned for Cam and Wisloe will swamp an already full Junction 12 and 14 so will be refused by National Highways. This will render the local plan unsound.	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14. SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered
028	PJS Development Solutions Ltd on behalf of Bathurst Ltd Site Promoter Strategic site allocation PS25	The Sharpness Branchline Strategic Outline Case seems to be indicating that including the additional southern links will result in an inordinate cost increase. We question whether this is deliverable/viable and will ever happen. There needs to be a degree of certainty to support directly related development allocations, and that certainty does not appear to be evidenced.	See responses to same question in Consultation Summary Sharpness New Settlement.
029	Sarah Bowles	Strategic sites which generate additional traffic for junctions 12 and 14 should not be included in the Local Plan until the transport network has been improved to a sufficient level to	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing

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		<p>accommodate the increased loading. Only sites which depend on J13 should be included (although the capacity at this junction should be carefully monitored) but this will mean that the Local Plan in its current form is undeliverable and unsound.</p>	<p>delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>
		<p>ALL planned developments should be included in ALL modelling, if additional housing provision is to be accommodated without serious negative impact on both existing and new residents.</p> <p>Wisloe Option B does not take into account the significant costs (all subject to cost volatility) upon which the development is predicated.</p>	<p>The traffic modelling incorporates appropriate forecasting methods to account for all development. The method of accounting for developments is based on the status of the development in the planning process, rather than the location, it is not due to legislative boundaries or preferred narratives. All development proposed by the SDLP is directly added to the model in the “with Development” (also known as “Do Something”) model. Development sites, both within Stroud and in neighbouring authorities, which are “committed” are directly added to the model. Where it is known that there will be housing growth, but specific sites are not committed through either planning applications or Local Plan allocations, it is necessary to apply housing and employment growth assumptions to the area as a whole. This is DfT</p>

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			methodology and has been agreed with the relevant highways authorities. It does not mean that development outside of Stroud District has not been included.
031	John Humphries	I have never been able to envisage this coming to fruition. Sheer cost is the first hurdle. I have worked on HS2, it illustrated clearly that our political structure, planning and funding mechanisms are poor in the UK. Pie in the sky.	Comment noted
032	David Thombs	EB136 includes a proposal to introduce an interim modification to the B4509, where it joins the A38 at J14, to permit a further 1000 dwellings' worth of car journeys at J14, despite NH stating they did not support the proposal. Further modelling work is required, and this has not been included within the consultation material. For PS37 (Wisloe), the option B proposal to share the housing allocations between multiple sites ignores the reality that significant up-front costs would be incurred associated with incorporating mandatory infrastructure, e.g. gas pipeline relocation and	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.

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		footbridge etc and the PS37 proposal is unviable. The proposal to include the Option B scenario within the LP would therefore make the LP undeliverable and unsound.	
		No SoCG from NH has been made available to clarify their position regarding EB136.	SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors
033	Suzanne Prosser	The schemes do not address fundamental capacity concerns or meet sustainability objectives	Comment noted
034	Owen Leleu	Strategic sites within the LP will overload junction 14 and will not be allowed by NH. Therefore this makes the LP undeliverable and unsound.	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14. SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered
		These sites are unlikely to be delivered with the LP timescale due to the works required to meet	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing

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		capacity issues, therefore those sites should be removed from the LP and only those that will use junction 13 should be included as that junction does not have the capacity issues of the other two, until such time as NH consider it safe to for other LP sites to progress.	delivery excluding sites impacting on M5 Junctions 12 and 14.
		<p>For Wisloe (PS37) the option B interim proposal to share 1000 housing allocations between multiple sites</p> <p>does not take into account the significant costs that would need to be met in diverting the gas pipeline and construction of the motorway bridge when a smaller number of houses are being built. All other housing would then be delayed until 2041 when the motorway junctions are improved and thus would drop the living standards of existing residents.</p>	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
		Please see my comments in 4a above regarding the quality of life for the residents of Dursley Road should Option B be considered.	This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14.
		If SDC cannot meet the LP housing targets due to the constraints of these motorway junctions then it makes the LP undeliverable and therefore unsound and the LP should be withdrawn until	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.

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		such time that the constraints of the motorway junctions have been resolved	
035	Danielle Ellis	Strategic sites will overload J14 and will not be permitted by National Highways (NH). Removing Strategic sites affected by J12/J14 shows that the draft Local Plan cannot deliver sufficient houses.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
		For PS37 (Wisloe), the option B interim proposal to share the 1000 housing allocations between multiple sites ignores the significant up-front costs that would be incurred e.g. gas pipeline move and footbridge etc to be shared by a smaller number of houses. Option B would also result in a 10-year pause to building, waiting for the roundabout to be built.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
036	Jessica Cuthbert-Smith	The sites will overload junction 14; National Highways will not permit them.	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.

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			SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered
037	David Scammell	For PS37 (Wisloe), the option B interim proposal to share the 1000 housing allocations between multiple sites ignores the significant up-front costs that would be incurred e.g. gas pipeline move and footbridge etc to be shared by a smaller number of houses. Option B would also result in a 10-year pause to building, waiting for the roundabout to be built.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
038	Vanessa Davies	The option with the least impact on housing.	Comment noted
039	Philip Butcher	The Strategic sites will overload Junction 14 and will not be permitted by National Highways. Removing the Strategic sites affected by junctions 12 and 14 means that the draft Local Plan will then not deliver sufficient housing.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.

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040	Doreen Brimble	<p>I support the Slimbridge Parish Council response. The proposed strategic sites will overload M5 Junction J14 (& is already overloaded) and will not be permitted by National Highways (NH). It does not take into account additional housing recently built/under construction/planned in the Stoud District A38 South of the district or those in Thornbury. Removing the proposed strategic sites affected by J12/J14 shows that the draft Local Plan cannot deliver sufficient houses.</p> <p>For proposed site allocation (PS37 Wisloe), the option B interim proposal to share the 1000 housing allocations between multiple sites ignores the significant up-front costs that would be incurred e.g. gas pipeline move and build a footbridge over the M5, build footbridges over the mainline railway etc to be shared by a smaller number of houses. Option B would also result in a 10-year pause to building, waiting for the roundabout to be built & to also note this does not have funding.</p>	<p>The traffic model forecasting accounts for planned and committed growth. Further information on the strategic modelling is available in EB61 and EB98. SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>

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041	Thomas Owens	The proposed strategic sites will overload M5 Junction J14 (& is already overloaded) and will not be permitted by National Highways (NH). It does not take into account additional housing recently built/under construction/planned in the Stoud District A38 South of the district or those in Thornbury. Removing the proposed strategic sites affected by J12/J14 shows that the draft Local Plan cannot deliver sufficient houses.	The traffic model forecasting accounts for planned and committed growth. Further information on the strategic modelling is available in EB61 and EB98. SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
		For proposed site allocation (PS37 Wisloe), the option B interim proposal to share the 1000 housing allocations between multiple sites ignores the significant up-front costs that would be incurred e.g. gas pipeline move and build a footbridge over the M5, build footbridges over the mainline railway etc to be shared by a smaller number of houses. Option B would also result in a 10-year pause to building, waiting for the roundabout to be built & to also note this does not have funding.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
042	Andrew Davis	Reports EB135 and Appendix 1 show the LP is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target.	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing

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		<p>As clarified in the Reg19 submissions, the Examination Hearing and now EB135, most of these strategic sites contribute significantly to the traffic load on the M5 at junction 12 and 14. Only strategic developments which utilise the existing J13 roundabout, which has excess capacity, (like PS19a at Stonehouse) should be included within the LP until NH deem it safe for additional strategic housing developments to progress.</p> <p>NH has stated J14 is at capacity already and further large-scale housing developments will not be permitted until after the J14 modifications have been implemented, which could be 2041. Removing the strategic sites, which contribute significantly to the J14 load, shows the LP cannot deliver sufficient housing numbers to fill the planning pipeline, which makes the current LP undeliverable and unsound.</p>	<p>delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>
		<p>Site G2 should be included within EB135 assessment.</p>	<p>Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. The site does not form part of the spatial strategy to meet Stroud District's</p>

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			<p>housing needs and does not form part of the Local Plan housing trajectory.</p> <p>The site is not a current commitment with planning permission or allocated by any adjoining Local Authority to meet their housing need and should not therefore be considered as 'planned growth' forming part of the draft Local Plan housing trajectory.</p>
		<p>The option B '1000 houses' scenario is not a viable option for PS37 as it ignores the up-front investment costs before the 10-year pause in building.</p>	<p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>
		<p>The SoCG from NH clarifying their agreement to EB135 has not been published. The LP is undeliverable and not sound.</p>	<p>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors</p>
		<p>Additionally, the travel patterns for new residents in the ongoing housing developments being built near J14 will disproportionately load J14 compared with historical assumptions. This change has not been modelled and is already therefore probably in excess of NH accepted loading levels.</p>	<p>The traffic model forecasting accounts for planned and committed growth. Further information on the strategic modelling is available in EB61 and EB98.</p>

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043	Kirk Walton	Jn 12 is already dangerous with queues backing up onto the M5 carriageways at peak times.	Comment noted
044	Helen Bamber	Strategic sites will overload J14 and will not be permitted by National Highways (NH). Removing Strategic sites affected by J12/J14 shows that the draft Local Plan cannot deliver sufficient houses.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
		For PS37 (Wisloe), the option B interim proposal to share the 1000 housing allocations between multiple sites ignores the significant up-front costs that would be incurred e.g. gas pipeline move and footbridge etc to be shared by a smaller number of houses. Option B would also result in a 10-year pause to building, waiting for the roundabout to be built.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
045	Berkeley Town Council	There are already severe delays to J12 modifications . We have no confidence in the time scale for improvements to J14 which is already at capacity during peak periods.	Comment noted

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046	Wisloe Action Group	<p>Reports EB135 and Appendix 1 show the LP is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target. As clarified in the Reg19 submissions, the Examination Hearing and now EB135, most of these strategic sites contribute significantly to the traffic load on the M5 at junction 12 and 14. Only strategic developments which utilise the existing J13 roundabout, which has excess capacity, (like PS19a Stonehouse) should be included within the LP until NH deem it safe for additional strategic housing developments to progress.</p>	<p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p>
		<p>NH stated J14 is at capacity already and further large-scale housing developments will not be permitted until after the J14 modifications have been implemented, which could be 2041. Removing the strategic sites, which contribute significantly to the J14 load, shows the LP cannot deliver sufficient housing numbers to fill the planning pipeline. The constraint at J14 which significantly limits housing development therefore makes the current LP undeliverable and unsound.</p>	<p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>

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		<p>The option B 1000 houses scenario is not a viable option for PS37 as it ignores the up-front infrastructure investment costs before the 10-year pause in building.</p>	<p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>
		<p>Additionally, the travel patterns for new residents in the ongoing housing developments being built near J14 will disproportionately load J14 compared with historical assumptions. This change has not been modelled and is already therefore probably exceeds NH accepted loading levels.</p>	<p>The traffic model forecasting accounts for planned and committed growth. Further information on the strategic modelling is available in EB61 and EB98.</p>
		<p>Site G2 should be included within the EB135 assessment.</p> <p>The SoCG from NH clarifying their agreement to EB135 has not been published.</p>	<p>Land at Whaddon (G2) is identified as a safeguarded site to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. The site does not form part of the spatial strategy to meet Stroud District's housing needs and does not form part of the Local Plan housing trajectory.</p> <p>The site is not a current commitment with planning permission or allocated by any adjoining Local Authority to meet their housing need and should not therefore be considered</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			as 'planned growth' forming part of the draft Local Plan housing trajectory.
047	Stagecoach West	We have reviewed the consultation documents, we don't believe that there is any additional detail or mitigations to what was raised at the reg 19 stage.	The consultation documents update the housing trajectory and set out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14 that were not submitted at Regulation 19.
049	Hardwicke Parish Council	The impact of development will have a significant negative impact on Hardwicke and surrounding parishes unless major improvements are made to the motorway junction and also the roads in and around the proposed development. It is important to note that development (residential and commercial) is continuing in neighbouring parishes ; Quedgeley/Kingsway and these developments already add to congestion leading to the M5 and villages along the A38	Comment noted

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>Is it anticipated that any development that will affect J12 is being considered before the junction is remodelled ?</p> <p>Any building South of Hardwicke whilst J12 is being remodelled will result in untenable traffic congestion.</p> <p>what is the anticipated timescale for housing delivery?</p>	<p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios setting out projected housing delivery excluding sites impacting on M5 Junctions 12 and 14</p>
050	Hamfallow Parish Council	<p>Attempts by the PS36 developers to take all of the available capacity of J14 with an interim reduced housing offer of 1000 are ill conceived, unjustifiable and do not represent the optimum solution for maximising the number of additional homes from the available capacity of J14.</p>	<p>National Highways' position on J14 is that there is no available capacity, and therefore any development which adds traffic to the junction would need to provide sufficient mitigation. The PS36 (Sharpness) developer is seeking to provide a mitigation scheme which delivers sufficient traffic capacity to accommodate 1,000 homes, rather than to take remaining available capacity. This would, of course, be subject to due process and scrutiny through a planning application.</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
051	Scott Temlett	Major development sites will overload J14, which will not be permitted by the National Highways Department.	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.
		If major development sites affected by J12 & J14 are removed, it demonstrates that the draft Local Plan cannot deliver enough housing.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered
		It is absolutely clear that future housing developments for Cam will impact both junctions.	The strategic modelling shows that some traffic from the Cam allocations would use M5 J14 for southbound travel. Other motorway-bound traffic from Cam housing development would use J13, which does not require mitigation as a result of the Local Plan. This has been accounted for in the modelling.
		The above statements means the plan is totally unachievable.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered
052	Alex Hunter	if the highways will not manage the flow locally and on arterial roads then the housing plan is	SDC believe that the work produced through the JAP addresses the strategic network

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		disjointed. clear that Cam allocations will impact the junctions and if, as in EB133b 4.3.15, a mass development of Wisloe and Cam is considered ; this will further impact trajectory, undermines the feasibility of the Plan and is not achievable	concerns and that the full trajectory will be delivered
053	Falfield Parish Council	<p>There's little consideration of the extent and impact of queuing traffic on the A38 in Falfield Village, due to increased traffic volume and longer wait times at A38 lights holding back more vehicles to keep the B4509 free flowing. Appendix 1 acknowledges this queuing worsens in Falfield with the 1000 Sharpness houses.</p> <p>There is no signalled pedestrian crossing of A38 in Falfield, more traffic and longer queues increases danger to residents and schoolchildren who need to cross this road daily.</p> <p>There is no consideration of environmental amenity and quality of life impact on existing communities down the road from the strategic sites who will bear the brunt of the output of the additional traffic generated by new development, i.e. increased congestion, road</p>	<p>Comment noted</p> <p>Comment noted</p> <p>Comment noted</p>

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		noise and poorer air quality. There are no mitigation measures for those adversely impacted.	
		Another M5 junction nearer new communities could be explored, given the long distance between M5 Junctions 13 and 14, that junction M5 J14 operates beyond capacity and the frequency that this part of the motorway is closed due to accidents or maintenance thus diverting onto the A38. As well as benefitting new residents it would mitigate the traffic effects on existing communities.	This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14.
		There must be a clear timetable and strategy for key infrastructure to help minimise road use in place prior to the house building commencing. The effects on of not doing so in a timely way terms of the impact on our road system and existing residents and communities cannot be mitigated	Comment noted

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
054	Stephen Willetts	<p>Reg19 submissions, the Examination Hearing and now EB135 strategic sites in the A38/M5 corridor required to deliver targets contribute significantly to the traffic load on the M5 at junction 12 and 14.</p> <p>This includes Cam allocation PS24 with respect to J14 contrary to previous hearing and public statements. If, as in EB133b 4.3.15, a super cluster of Wisloe and Cam is considered holistically even more so, also then including PS25.</p>	<p>Sites at Wisloe and Cam would be expected to contribute to the funding of the J14 improvements, as outlined in EB133b.</p> <p>The reference to a “Super Cluster” in EB133b is not considered to be a fully correct interpretation of EB133b. The reference made is in relation to the interrelation between planned growth at Wisloe and Cam in relation to wider Severn Edge proposals, which forms part of the strategic case for securing funding for the J14 improvements.</p>
		<p>Travel patterns for new residents in the ongoing housing developments being built near J14 will disproportionately load J14 compared with historical assumptions. This change has not been modelled despite being raised in hearings. J14 could therefore already be in excess of NH accepted loading levels. PS24 only generating 60 trips from 900 homes is not credible.</p>	<p>The traffic model forecasting accounts for planned and committed growth. Further information on the strategic modelling is available in EB61 and EB98.</p>
		<p>Only strategic developments utilising the existing J13 roundabout (like PS19a at Stonehouse), which has excess capacity although uncertain how much, should be included within the LP</p>	<p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p>

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		until NH deem it safe for additional strategic housing developments to progress.	
		NH states J14 is at capacity already and further large-scale housing developments will not be permitted until J14 modifications have been implemented, which could be 2041. Removing the strategic sites, which contribute significantly to the J14 load, shows the LP cannot deliver sufficient housing numbers to fill the planning pipeline	<p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered</p>
		The Statement of Common Ground from NH clarifying their agreement and concerns to EB135 has not been published.	SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors
		The constraint at J14 which significantly limits housing development therefore makes the current LP undeliverable and unsound.	<p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered</p>

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055	Slimbridge Parish Council	<p>Reports EB135 and Appendix 1 show the LP is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target. As clarified in the Reg19 submissions, the Examination Hearing and now EB135, most of these strategic sites contribute significantly to the traffic load on the M5 at junction 12 and 14. Only strategic developments which utilise the existing J13 roundabout, which has excess capacity, (like PS19a at Stonehouse) should be included within the LP until NH deem it safe for additional strategic housing developments to progress.</p> <p>NH has stated J14 is at capacity already and further large-scale housing developments will not be permitted until after the J14 modifications have been implemented, which could be 2041. Removing the strategic sites, which contribute significantly to the J14 load, shows the LP cannot deliver sufficient housing numbers to fill the planning pipeline. The constraint at J14 which significantly limits housing development therefore makes the current LP undeliverable and unsound.</p>	<p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>Additionally, the travel patterns for new residents in the ongoing housing developments being built near J14 will disproportionately load J14 compared with historical assumptions. This change has not been modelled and is already therefore probably in excess of NH accepted loading levels.</p> <p>The SoCG from NH clarifying their agreement to EB135 has not been published.</p>	<p>The traffic model forecasting accounts for planned and committed growth. Further information on the strategic modelling is available in EB61 and EB98.</p> <p>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors</p>
056	Cllr Lindsey Green Stroud District Council	<p>Reports EB135 and Appendix 1 show the LP is overly dependent upon strategic sites in the A38/M5 corridor to achieve the housing target. As clarified in the Reg19 submissions, the Examination Hearing and now EB135, most of these strategic sites contribute significantly to the traffic load on the M5 at junction 12 and 14. Only strategic developments which utilise the existing J13 roundabout, which has excess capacity, (like PS19a at Stonehouse) should be included within the LP until NH deem it safe for additional strategic housing developments to progress.</p>	<p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p>

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		<p>NH has stated J14 is at capacity already and further large-scale housing developments will not be permitted until after the J14 modifications have been implemented, which could be 2041. Removing the strategic sites, which contribute significantly to the J14 load, shows the LP cannot deliver sufficient housing numbers to fill the planning pipeline. The constraint at J14 which significantly limits housing development therefore makes the current LP undeliverable and unsound.</p>	<p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered</p>
		<p>Additionally, the travel patterns for new residents in the ongoing housing developments being built near J14 will disproportionately load J14 compared with historical assumptions. This change has not been modelled and is already therefore probably in excess of NH accepted loading levels.</p>	<p>The traffic model forecasting accounts for planned and committed growth. Further information on the strategic modelling is available in EB61 and EB98.</p>
		<p>The SoCG from NH clarifying their agreement to EB135 has not been published.</p>	<p>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors</p>

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058	Carl Merry	Large strategic sites can only overload motorway junctions and as such will not be permitted by NH	<p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered</p>
059	Haydn Jones	PS24, PS25, PS36 and PS37 all contribute significantly to M5J14. This junction is already recognised as being at capacity and this does not include the ongoing development at Falfield and Charfield that directly impacts this same junction. National Highways have stated that they have no current plans or funding identified for works at either M5J12 or M5J14. The proposed local plan is not deliverable as proposed and is therefore unsound.	<p>The traffic model forecasting accounts for all planned and committed growth. Further information on the strategic modelling is available in EB61 and EB98.SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>

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060	Savills on behalf of Catesby Estates	<p>EB135 sets out the results of a number of housing delivery scenarios based on different combinations of improvements at J12 and J14. What stands out is that the highest housing delivery any scenario could secure without the J14 works is 80%. Given the uncertainty over funding and delivery of the junction improvement works, the allocation of such a significant scale of development which is reliant upon the replacement of J14, most notably the Sharpness New Community, undermines the delivery of the strategic housing requirement and renders the draft Local Plan unsound.</p> <p>The allocation of the Land South of Whaddon in the Local Plan would help overcome this objection. The transport evidence demonstrates that the capacity constraints at J12 are associated with the off-slip from the M5 during the AM peak, presumably as commuters enter Gloucester for employment purposes. Development at Whaddon would:</p> <p>a) generate very few movements which would add to the specific location of the congestion at J12; and</p>	<p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p> <p>The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session 8/3/2023 and is not part of the current consultation.</p> <p>No additional sites are being considered by the Inspectors as part of the current Local Plan Examination.</p> <p>This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to infrastructure provision at PS36, PS37 and M5 J12 and J14.</p>

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		<p>b) would provide an opportunity for employees in Gloucester to find accommodation closer to their place of work thereby reducing the need to commute using the M5.</p> <p>The evidence submitted previously within our representations and examination hearing statements demonstrates that development at Whaddon could come forward during the plan period in advance of, and without reliance upon, major strategic infrastructure improvements. This would not only enable delivery early in the plan-period but it would reduce the amount of funding directed towards highways infrastructure and support investment in social and community infrastructure; maximising the benefit of delivering development in this highly sustainable location.</p>	
061	Denis Bannister	<p>In simple terms the Local Plan has completely overlooked the implications of the cumulative house building along the A38 corridor. Breaking out elements of the strategic plan and dealing with them individually has masked the bigger picture.</p>	<p>The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session 8/3/2023 and is not part of the current consultation.</p>

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			This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to infrastructure provision at PS36, PS37 and M5 J12 and J14.
062	<p>Rackham Planning Ltd on behalf of the landowner of the land at Hook Farm, Berkeley</p> <p>Site promoter Local site allocation BER016/ 017 Lynch Road, Berkeley</p>	<p>Our specialist transport consultants, Ardent, have reviewed document EB135 and Appendix 1 which details that BER016/17 land at Lynch Road, Berkeley is removed from the SDC housing trajectory in the “No J14” scenario. It is noted that this conclusion has been drawn purely from a location basis and was not included in the Saturn modelling that formed the basis of the assessment.</p> <p>Detailed census-based trip distribution has been undertaken, with trips associated with 85 dwellings assigned to the network based on Google maps routing using a neutral AM weekday peak period. This assessment demonstrates a negligible number of vehicles passing through J14, which would be well within the daily variation of flows. It is noted that no impact on J12 is anticipated.</p>	<p>SDC confirm that the “No J14” trajectory analysis does not include housing from BER 016/17. This has been based on both the location and likelihood of impact on a robust basis in order to demonstrate a worst-case level of housing which could come forward within the SDC Local Plan should improvements to J14 not be realised. This is a small site, and it would not be proportionate to use strategic modelling to assess the level of traffic generated by each site passing through the junction, therefore it is appropriate to consider on the basis of proximity to a tested major site allocation.</p> <p>National Highways’ position on J14 is that there is no available capacity, and therefore any development which adds traffic to the junction, regardless of the extent, would need</p>

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		Removing BER016/17 with no formal assessment being undertaken removes deliverable housing from the trajectory with no evidence-based reasoning and we object on this basis to the removal of this site from the housing trajectory.	to contribute towards mitigation. It will be for the site promoter to provide a Transport Assessment through a planning application, and to demonstrate to the satisfaction of National Highways, whether the site can come forwards without an unacceptable impact on Junction 14.
063	Shelagh Daley	Unless improvements can be made to junctions 12 and 14 the Local Plan is not viable or deliverable.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
		For PS37 (Wisloe), the option B proposal to share the 1000 housing allocations between multiple sites ignores the significant up-front costs that would be incurred e.g. gas pipeline move and footbridge etc to be shared by a smaller number of houses and that it would result in a 10-year pause.	SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.
064	Jo Kendall	Strategic sites will overload J14 and will not be permitted by National Highways. Removing	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		Strategic sites affected by J12/J14 shows that the draft Local Plan cannot deliver sufficient houses	<p>delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>
		Contrary to hearing statements it is now clear that Cam allocations will impact the junctions and if, as in EB133b 4.3.15, a super cluster of Wisloe and Cam is considered this will further impact trajectory as this is considered holistically	<p>Sites at Wisloe and Cam would be expected to contribute to the funding of the J14 improvements, as outlined in EB133b.</p> <p>The reference to a “Super Cluster” in EB133b is not considered to be a fully correct interpretation of EB133b. The reference made is in relation to the interrelation between planned growth at Wisloe and Cam in relation to wider Severn Edge proposals, which forms part of the strategic case for securing funding for the J14 improvements.</p>
		the impact of the already approved 800+ houses already approved a Millfields/Box Road in Cam is not clear in the J14 modelling. The above renders the plan undeliverable and so unsound	The Strategic modelling has taken account of committed development and proposed SDLP allocations. This includes sites in Cam.

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066	Catherine Wayne	The interim scheme described for j 14 has some of the evidence missing that is required by National Highways and therefore it is not clear whether the plans are viable. Even if the scheme is given the go-ahead, building a maximum of 1,000 houses would achieve none of the alleged benefits of the original scheme and further emphasise the isolated nature of the development	The interim scheme is being promoted by the Sharpness development, and not SDC. SDC is supportive of the scheme on the proviso that the developer can satisfy National Highways that the interim scheme is deliverable and can enable 1,000 homes to be built. As stated, this would be an interim scheme in advance of the delivery of the full scheme proposed by SDC. In the event that the interim scheme was acceptable to NH, it would enable more homes to be delivered prior to the need for a full scheme, and not replace the need for a full scheme. It is understood that the Sharpness developer does not intend to cap the level of development at 1,000 homes, but expects a planning condition to be applied limiting development to 1,000 homes prior to delivery of the full M5 J14 scheme. This would, of course, be subject to due process and scrutiny through a planning application.
067	Sally Allen	It is clear that until the infrastructure is put in place to address the already over capacity J12/14 there should not be any further building. Small towns and villages with narrow roads are	This consultation seeks to address the specific matters of soundness raised by the Inspectors

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		swamped daily by the volume of traffic, these are roads that were built for much smaller vehicles not the huge cars, lorry's and buses that plough down them now. There is no pleasure in living on an estate the becomes totally inaccessible at peak times. There needs to be a radical rethink of any future housing along this corridor, until the infrastructure identified is addressed and implemented, it is not acceptable to blindly build and expect homeowners to put up with the mess created by the planners.	in relation to infrastructure provision at PS36, PS37 and M5 J12 and J14.
069	Berkeley and Sharpness Residents' Action Group (BaSRAG)	The interim scheme described for junction 14 has some of the evidence required by National Highways missing and therefore it is unclear whether the plans are viable. Even if the scheme is given the go-ahead, building a maximum of 1,000 houses would achieve none of the alleged benefits of the original scheme and further emphasise the isolated nature of the development.	The interim scheme is being promoted by the Sharpness development, and not SDC. SDC is supportive of the scheme on the proviso that the developer can satisfy National Highways that the interim scheme is deliverable and can enable 1,000 homes to be built. As stated, this would be an interim scheme in advance of the delivery of the full scheme proposed by SDC. In the event that the interim scheme was acceptable to NH, it would enable more homes to be delivered prior to the need for a full scheme, and not replace the need for a full scheme. It is understood that the Sharpness

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			<p>developer does not intend to cap the level of development at 1,000 homes, but expects a planning condition to be applied limiting development to 1,000 homes prior to delivery of the full M5 J14 scheme. This would, of course, be subject to due process and scrutiny through a planning application.</p>
070	Gillian Delve	<p>There seems to be a suggestion that widening the B4509 approach to J14 of the M5 would allow 1000 houses to be built at Sharpness (PS36). How can this be sensible? The cost would no doubt be significant, even if the money could be found. Surely it is only putting a sticking plaster on the problem. The money would be better kept until there is enough to do the job properly and do the full upgrade of the junction. As this is not viable at the present time, this makes large houses developments such as Sharpness (PS36) and Wisloe (PS37) impossible, thus making the LP undeliverable and unsound.</p>	<p>The interim scheme is being promoted by the Sharpness development, and not SDC. SDC is supportive of the scheme on the proviso that the developer can satisfy National Highways that the interim scheme is deliverable and can enable 1,000 homes to be built. As stated, this would be an interim scheme in advance of the delivery of the full scheme proposed by SDC. In the event that the interim scheme was acceptable to NH, it would enable more homes to be delivered prior to the need for a full scheme, and not replace the need for a full scheme. It is understood that the Sharpness developer does not intend to cap the level of development at 1,000 homes, but expects a planning condition to be applied limiting development to 1,000 homes prior to delivery</p>

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			of the full M5 J14 scheme. This would, of course, be subject to due process and scrutiny through a planning application.
071	Darius Ferrigno	Strategic sites will overload J14 and will not be permitted by National Highways (NH). Removing Strategic sites affected by J12/J14 shows that the draft Local Plan cannot deliver sufficient houses.	<p>EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.</p> <p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>
073	Copperfield L&P Limited on behalf of Colethrop Farm Limited Site promoter part Strategic site allocation PS30	In the absence of detail on the traffic modelling undertaken within the consultation we have considered previous modelling. The Funding & Delivery Plan submitted to the LPR states in paragraph 2.1 that the traffic effects arising from SDLP growth across Stroud District has been assessed using a strategic transport model (SATURN). Details of the strategic modelling methodology and the results of the assessment are outlined in the Traffic Forecasting Report	<p>The TFR, TFR Addendum and F&D Plan and the scenarios tested therein are not the subject of the current consultation.</p> <p>The Hunts Grove Extension is an allocation in the SDC Local Plan (ref. PS30) and therefore it is appropriate to include it in the assessment of J12 and for the allocation to be included in the funding considerations for the improvements to J12. The modelling for the</p>

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		<p>(TFR) and Traffic Forecasting Report Addendum (TFR Addendum) which form part of the SDLP evidence base.</p> <p>The TFR outlines that Do Minimum and Do Something scenarios were modelled. Section 4.3 explains that advice provided in Webtag Unit M4, has been used to determine development to be included in the Do-Minimum scenarios which are only developments with planning permission or applications within the consent process. The Webtag guidance states that allocated sites within a Development Plan should be excluded from the core scenario but states they may form part of the alternative scenarios. It is our view that an alternative do-minimum scenario including current allocations should have been tested.</p> <p>A contribution from HGE to M5 Junction 12 would need to pass the tests for obligations set out in the CIL Regulations, and repeated in the NPPF. We have seen no evidence (modelling) demonstrating that impact from HGE would be unacceptable. In the absence of appropriate modelling the assumption that HGE could not</p>	<p>SDC Local Plan, inclusive of the allocation for the Hunts Grove Extension, confirms that there will be a severe cumulative impact at J12 which the SDC Local Plan as a whole is required to address. It is not the purpose of strategic modelling for a Local Plan to assess individual allocations in isolation.</p> <p>SDC confirm that the “No J12” trajectory analysis does not include housing from Hunts Grove Extension. This has been based on both the location and likelihood of impact on a robust basis in order to demonstrate a worst-case level of housing which could come forward within the SDC Local Plan should improvements to J12 not be realised.</p>

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		proceed in the absence of major improvements to M5 J12 is not justified.	
074	Grass Roots Planning on behalf of Redrow Home Ltd Site promoter of alternative sites Land at Charfield Road, Kingswood and Land north of Hyde Lane, Whitminster	With the J12 and J14 constraints added to the trajectory it is clear that additional sites are required to bolster supply in the early years of the plan. Such sites would need to have been identified as not impacting on the SRN based on their location or demonstrate that they are sustainable in offering a modal shift from the private car or less reliance on the SRN.	The Local Plan Spatial strategy was considered at the Matter 2 Examination hearing session 8/3/2023 and is not part of the current consultation. No additional sites are being considered by the Inspectors as part of the current Local Plan Examination. This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to infrastructure provision at PS36, PS37 and M5 J12 and J14.
075	Sarah Jones	The plan is overly dependent upon strategic sites in the A38/M5. The hearing sessions and EB135 confirm most of these contribute significantly to the traffic load on the M5 Junction 14. There is capacity for sites at M5 Junction 13.	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14.

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		<p>NH state M5 J14 is at capacity and further large-scale developments will not be permitted, which would be post 2041. Removal of strategic sites contributing significantly to the Junction 14 load leads to insufficient numbers to meet the councils plan. The option B scenario to permit 1000 houses in the A38/M5 corridor, in lieu of the J12/J14 changes, ignores the issues associated with up-front infrastructure investment costs. The option would result in a 10-year halt while the roundabout at J14 was built. For PS37, this delay would make the entire proposal unviable as it requires significant initial infrastructure investment to move the gas pipeline, build footbridge, build the mile-long acoustic embankment, network rail mitigations (building foot bridges in place of level crossings) etc.</p>	<p>SDC believe that the work produced through the JAP addresses the strategic network concerns and that the full trajectory will be delivered.</p>
		<p>The SoCG from NH clarifying their agreement to EB135 has not been published.</p>	<p>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors</p>
		<p>This level of infrastructure spend is not justified for a few hundred houses. Accurate modelling for the ongoing developments near M5 Junction Junction 14 and travel patterns will demonstrate that load is already in excess of NH accepted</p>	<p>This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to infrastructure provision at PS36, PS37 and M5 J12 and J14 to support the planned provision of more than 9,000 homes</p>

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		loading levels. Home England state “there’s been no Homes England involvement in the proposed sites...”.	on allocated sites as part of meeting the District’s housing needs of 12,600 new homes over the Plan period.
076	Persimmon Homes Severn Valley Site promoter part Strategic site allocation PS24 and Local site allocation PS38	Persimmon Homes supports the principle set out in EB135, that an interim improvement can be delivered at Junction 14 that would allow a certain scale of development to come forward, prior to strategic improvements at Junction 14 being implemented.	Support noted
		Persimmon Homes supports Option B, where the delivery of a number of allocations could be unlocked by an interim improvement. This would better support housing delivery in the early stages of the Plan Period, compared to Option A which relies on a single site for delivery. Whilst the 'Sharpness interim scheme' demonstrates the principle that a workable solution to facilitate housing delivery in advance of major improvements at J14 is possible, it is entirely feasible that that an alternative interim scheme can be designed that is allied to a planning permission (or permissions) and can be	Support noted

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		promptly delivered by other parties, under Option B.	
077	Sarah Davis Sarah Davis Glass	The lack of correspondence between timings for road development and the planned housing developments means that the LP is not realistic. The whole LP needs to be revisited to obtain some workable, realistic scenarios at acceptable cost rather than fiddling around with an unsound plan in a vain attempt to make it work. As a local business owner I need to know that the road system will enable simple, timely travel. At present there is nothing in the LP that gives me confidence that this will be achieved if it is implemented as stated.	This consultation seeks to address the specific matters of soundness raised by the Inspectors in relation to M5 J12 and J14.
079	Cam Parish Council	Strategic sites will overload J14 and will not be permitted by National Highways (NH). Removing Strategic sites affected by J12/J14 shows that the draft Local Plan cannot deliver sufficient houses Cam allocations have proven to impact the junctions Wisloe will further impact trajectory	EB135 M5 Junctions 12 and 14 scenarios sets out a range of scenarios for projected housing delivery excluding sites impacting on M5 Junctions 12 and 14. SDC believe that the work produced through the JAP addresses the strategic network

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			concerns and that the full trajectory will be delivered.
080	Eastington Parish Council	It is likely that junction 14 will be improved, due to the joint need for both SDC proposed development sites and South Gloucestershire proposed development sites.	Comment noted