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20 July 2021

Dear Planning Strategy Team,

## **STROUD DISTRICT LOCAL PLAN REVIEW: PRE-SUBMISSION DRAFT PLAN (REGULATION 19 CONSULTATION) MAY 2021**

Highways England welcomes the opportunity to comment on the Stroud Pre-submission Draft Local Plan. We understand that the new Local Plan, when adopted, will set out where development will take place in the District up to 2040 and will also include policies which will be used to assess future planning applications.

As you will be aware, Highways England is responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises the M5 Junctions 12 and 13, and also M5 Junction 14 which, although in South Gloucestershire, is affected by development located in Stroud's District.

The purpose of the SRN, which is critical national infrastructure asset, is to provide a safe, free-flowing and reliable highway network for strategic movements to support economic growth. It is on the basis of these responsibilities that Highways England has provided the comments that follow in this letter.

### **The Role of Highways England in Plan Making**

Highways England is keen to ensure that policy takes account of transport and land use planning to be closely integrated. In this respect, Highways England draws your attention to DfT Circular 02/2013, which sets out how we will engage with the planning system to deliver sustainable development.

Highways England recognises that prosperity depends on our roads, aims to support growth and facilitate development based on an understanding of traffic conditions and behaviour, to manage the effects of development and ensure road safety. To constructively engage in the local plan-making process, we require a robust evidence-base for consideration so that sound advice can be given to local planning authorities on the appropriateness of proposed development in relation to the SRN. This also extends to include the identification of transport solutions that may be required to mitigate

adverse impact on the SRN and support the delivery of sustainable economic growth across the Plan area.

Paragraph 12 of Circular 02/2013 states that *'The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.'*

Paragraph 15 states that *'In order to develop a robust transport evidence base [for local plans], the Agency (now Highways England) will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety.'*

Paragraph 18 states that *'Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency (now Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.'*

Responses to Local Plan consultations are also guided by other pertinent policy and guidance, notably the National Planning Policy Framework (NPPF) and the 'Highways Agency (Highways England) and the Local Plan Process' protocol.

During our engagement with the District Council, we have discussed the current performance of the SRN within and just outside Stroud's boundaries, which needs to be considered in the evidence base supporting the Local Plan. SRN junctions on the M5 in Stroud and neighbouring South Gloucestershire are already constrained at peak times, resulting in significant queuing and delay which can extend onto the motorway mainline. In accordance with DfT Circular 02/2013 and NPPF, Highways England would take the view that any development adding trips to an off-slip, which then results in mainline queuing, extends a mainline queue, and/or increases the frequency at which a mainline queue occurs, will have an unacceptable safety impact on the SRN.

### **Pre-submission Draft Local Plan**

The current Stroud Local Plan, adopted in 2015, sets out the land use planning strategy in the District up until 2031. The Pre-submission Draft Local Plan sets out an overarching spatial vision for 2040.

The vision is supported by six Strategic Objectives (SO). The following SOs are of interest to Highways England:

- Strategic Objective SO2: Local economy and jobs, which states that “[the] development of employment sites in the M5/A38 corridor will mean that development can be located close to strategic road and rail networks and in places that business wants to be... Planning for employment together with housing also provides the opportunity for residents to work locally and to reduce out-commuting levels.”;
- SO4: Transport and Travel “Promoting healthier alternatives to the use of the private car and seeking to reduce CO2 emissions by using new technologies, active travel and/or smarter choices, working towards a more integrated transport system to improve access to local goods and services.” This goes on: “By concentrating development at locations where new and improved public transport and active travel routes will be prioritised and integrated, the strategy should deliver convenient, safe and healthier alternatives to the private car (to serve both existing and new communities). The strategy involves specific proposals to enhance the rail network through new stations at Stonehouse and at Sharpness and to deliver a strategic walking and cycling network along main movement corridors.”; and
- SO5: Climate Change and Environmental Limits which “[promotes] a development strategy that reduces our District’s carbon footprint, adapts to climate change and respects our environmental limits by (fifth bullet) supporting a pattern of development that prioritises the use of sustainable modes of transport”.

Highways England welcomes these objectives. We share many of the same goals as the District Council, including the desire for housing to be located at sites which are sustainable in transport terms, a transport strategy which identifies the infrastructure and interventions necessary to deliver sustainable economic growth, and a safe and efficient transport network.

Employment development often contributes significantly to peak hour traffic. The attraction to business of locating in highly accessible locations is recognised, and we are aware that many businesses would like to be located close to the SRN. Indeed, for some businesses, close proximity to the SRN is essential. The Draft Local Plan recognises the need (in SO2) to integrate housing and employment, to reduce levels of out-commuting, although Highways England would note that it remains necessary to address the infrastructure needs of residual out-commuting.

When considering the location and associated supporting infrastructure for new employment areas, the SRN should not be considered as an alternative to providing improvements to the existing sustainable modes network (i.e. pedestrian, cycle and bus networks) as well as the local road network for journeys to and/or from work. These improvements should include the planning of adequate highway infrastructure to provide for local movements, thereby maximising the ability of the SRN to serve strategic movements to, from and through the Stroud area. Excessive use of the SRN for local movements impacts on the performance of the SRN and hence its ability to support wider ambitions for economic growth in the Plan area and across Stroud and Gloucestershire.

The Local Plan’s development strategy will distribute at least 12,600 additional dwellings and 79 hectares (ha) of new employment land to meet development needs for the next 20 years.

Core Policy CP2 (Table 3, p.34, and Table 5, p.40) will concentrate housing growth at the main towns of Cam and Dursley (1,080 dwellings), Stonehouse (700 dwellings) and Stroud, where the Plan states there is best access to services, facilities, jobs and infrastructure.

Housing and employment growth will also be provided at two new settlements, intended to create new sustainable communities along garden village principles: Sharpness (up to 2,400 dwellings and 10ha employment by 2040, increasing to 5,000 dwellings by 2050 (beyond the Local Plan period)); and at Wisloe (up to 1,500 dwellings and 5ha employment) within the Severn Vale (Rail/A38/M5 corridor).

In addition to meeting Stroud's housing needs, the Local Plan addresses unmet needs from neighbouring Gloucester by allocating a site for 3,000 dwellings at Whaddon for delivery by 2040 (p.34).

The balance of dwellings in the Local Plan is made up with the allocation of smaller sites across Stroud District.

In total, 79ha of employment land is indicated in the Plan (Table 5, p.40), of which 27ha is allocated to Javelin Park (adjacent to M5 Junction 12), 10ha at Stonehouse Eco-Park (M5 Junction 13) and 17ha in total at Sharpness and Sharpness Docks. The Plan explicitly states that *“the employment strategy set out within this Local Plan seeks to deliver... economic growth and additional jobs on and adjacent to existing high value employment sites and within the M5/A38/rail growth corridor.”* (p.41).

The Pre-Submission Draft Local Plan is supported with a [Traffic Forecasting Report](#) (March 2021), a [Sustainable Transport Strategy](#) (February 2021) and an [Infrastructure Delivery Plan](#) (June 2021). The Traffic Forecasting Report and Infrastructure Delivery Plan are discussed in the following sections in the context of the SRN and the development impacts on it.

## **Traffic Forecasting Report**

The [Traffic Forecasting Report](#) (TFR) (March 2021) details the traffic modelling undertaken in relation to the Draft Local Plan to assess the impact of the proposed site allocations (and residual allocations still to be brought forward) on both the local and strategic road networks, and to articulate a long-term transport investment strategy within the District and adjoining areas. The report sets out high-level highway infrastructure requirements to support and mitigate the traffic impacts of the Draft Local Plan and informs the Infrastructure Delivery Plan (IDP). The TFR identifies the main locations and broad scale of likely interventions required and provides a starting point for the development of detailed schemes related to particular developments as they come forward through the planning process.

Table 5.6 of the TFR (TFR, p.44) indicates that largest trip generator is the new settlement at Sharpness (Policy PS36), it is noted that this has only been modelled for the proposed Local Plan allocation of 2,400 dwellings (TFR, p.41, Table 5.2) and not for the additional 2,600 dwellings taking the development to 5,000 dwellings subject to Local Plan Review in the period to 2050 (Policy PS36, p.178).

The TFR identifies a requirement for the following SRN improvements:

- M5 Junction 12 – replacement of existing single overbridge dumbbell arrangement with a new grade-separated signalised roundabout.
- M5 Junction 13 – inclusion of traffic signals on all approaches to existing roundabout junction.
- M5 Junction 14 – replacement of existing single overbridge diamond interchange with new grade-separated signalised roundabout.

Whilst the TFR notes that congestion issues will occur without Local Plan development, the work also acknowledges that proposed allocations will further exacerbate problems and necessitate significantly greater interventions than might otherwise be required.

Given the potential and indicated impacts of development traffic at M5 junctions, the need for mitigation options on the SRN could prove to be significant in scale. The purpose of the SRN is to provide a safe, free-flowing and reliable highway network for strategic movements to support economic growth. If the SRN is used by significant numbers of trips from new residential and employment development, the SRN may be unable to fulfil its purpose and hence local growth could be constrained.

Highways England has previously accepted the TFR assessment methodology and findings, and therefore our principal interest is that infrastructure requirements are appropriately signposted in Local Plan Policy. It is therefore requested that the need for the necessary infrastructure is set out in both individual allocation policies where necessary and an over-arching infrastructure policy, to provide assurance that the authority is committed to bringing the necessary infrastructure forward in line with the proposed growth aspirations.

### **Infrastructure Delivery Plan**

[The Infrastructure Delivery Plan \(IDP\) \(June 2021\)](#) provides an assessment of the infrastructure that will be required to support the housing and employment growth set out in the Pre-Submission Local Plan and seeks to identify where new or improved infrastructure could help to unlock development sites.

Necessary infrastructure improvements for the SRN identified by the TFR are included in the IDP. Indeed, the IDP recognises that key challenges identified in the Pre-Submission Draft Local Plan include major transport works identified for the M5 Junctions 12, 13 and 14, together with improvements along the A419 and A38 corridors.

The IDP concludes that (IDP p.31) *“Collaborative working will be required with South Gloucestershire, Highways England and other Stakeholders to develop a scheme of mitigation to resolve predicted capacity issues at Junction 12, Junction 13 and Junction 14 of the M5 to support the growth set out in the Local Plan.”*

Whilst Highways England welcomes the identification of necessary improvements to SRN junctions, we are concerned that the Draft Local Plan itself feels somewhat disconnected from the supporting evidence base (in the form of the TFR and IDP) with little, if any, specific reference to the SRN and its junctions.

The following paragraphs list each SRN junction and the most significant developments in the Pre-Submission Draft Local Plan having an impact upon them as identified by the TFR.

## **M5 Junction 12**

At Gloucester, the IDP (IDP p.26) makes specific reference to the employment sites to be allocated at M5 Junction 12 and Javelin Park and that *“transport modelling indicates that Junction 12 of the M5 is likely to be operating at capacity, with pinch-points identified at the B4008 entries and the northbound on-slip. Highway mitigation has been tested in the form of a new all-movements grade-separated junction and incorporating two overbridges. This scheme is in its infancy and further work will be required to determine its appropriateness in collaboration with Highways England.”*

The IDP (IDP p.27) indicates that the following developments will have an impact at M5 Junction 12 and that it is likely that contributions will be sought via s.106 agreement:

- PS30 Hunts Grove extension;
- PS32 South of M5 Junction 12;
- PS43 Javelin Park;
- G1 South of Hardwicke; and
- G2 Land at Whaddon.

However, the Draft Local Plan policies do not appear to explicitly state the need to contribute towards SRN improvements.

Policy PS30 (p.145) makes no reference to the necessary infrastructure identified in the IDP or the need to contribute to the costs of such improvements. PS32 (p.147) states only that *“Development will provide sustainable transport measures to link the site with Gloucester City, Stonehouse and Stroud and necessary improvements to the existing highway network.”* Policy PS43 Javelin Park (p.148), located immediately south of M5 Junction 12, is similarly worded.

Policy G1 (bullet 20, p.151) and G2 (bullet 21, p.159) state the need to address *“Any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location”*.

Sites allocated within the emerging Local Plan should be representative of those within the associated IDP. It is requested that the Local plan is updated to ensure that, where required, allocations reference necessary infrastructure required to bring forward individual or cumulative sites.

Highways England would recommend that Policies PS30, PS32, PS43, G1 and G2 explicitly reference the need for improvements at M5 Junction 12, as identified by the IDP (IDP p.27).

## M5 Junction 13

The IDP (IDP p.23) states that *“movements at the M5 Junction 13 will increase substantially as a result of the growth set out in the Local Plan Review”* and it is *“likely that the development at and around M5 Junction 13 will need to contribute towards improvements in this location via s.106 agreement.”*

The IDP (IDP, p.24) specifically references the following developments will have a measurable impact at M5 Junction 13:

- PS19a Stonehouse North West; and
- PS20 Eco Park M5 Junction 13.

Approximately 700 homes (PS19a) are proposed in the Stonehouse North West allocation, and 10ha of employment land (PS20) proposed at M5 Junction 13.

However, the impact on M5 Junction 13 identified in the IDP is not explicitly referenced within the Draft Local Plan which states (p.109) *“contributions will be required towards sustainable transport measures on the A38 and A419 sustainable transport corridors and towards extending local bus services and the re-opening of Stonehouse Bristol Road rail station”*. It also says (p.109) *“vehicular access will be primarily from the Great Oldbury distributor road and from Oldends Lane, with necessary highway improvements consistent with the findings of the STS and the Traffic Forecasting Report.”*

Under bullet 20 of Policy PS19a the Local Plan states that development should address *“Any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location”*.

Policy PS20 for the Eco Park M5 Junction 13 allocation is similarly worded and bullet 20 is the same text as for PS19a.

Highways England would request that Policies PS19a and PS20 are strengthened to reference the need for improvements at M5 Junction 13, reflecting the references to the A38 and A419 in other bullets.

## M5 Junction 14

The TFR ([Appendix I Figures I.3 and I.4](#)) shows a significant proportion of trips associated with development at Sharpness accessing the M5 at Junction 14 for movements towards Bristol and (to a lesser extent) at Junction 13 towards Cheltenham and the Midlands.

The IDP notes that (IDP p.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.”*

The TFR (p.73) also indicates that developments at PS24 Cam North West (900 dwellings) and PS37 Wisloe new settlement (1,500 dwellings and 5ha office, B2 and B8 employment) could also affect M5 Junction 14.

Ultimately, the TFR concludes that improvements at Junction 14 are required to deliver planned growth.

The IDP (IDP, p.29) identifies the need for improvements at M5 Junction 14 to provide a grade separated roundabout requiring the construction of new bridge(s), a scheme to widen the A38 and the approach from the B4509. The IDP expects that development within the vicinity of the junction would provide financial contributions towards addressing capacity issues in this location.”

Developments listed in the TFR and IDP affecting M5 Junction 14 are:

- PS24 Cam North West;
- PS34 Sharpness Docks;
- PS36 Sharpness New Settlement; and
- PS37 Wisloe new settlement.

The Draft Local Plan (p.27) also notes that *“South Gloucestershire Council is at the early stages of preparing a new Local Plan which is considering options for housing growth at Charfield and Buckover Garden Village, together with transport improvements at M5 Junction 14...”*.

Therefore, the impacts of traffic at M5 Junction 14 from developments within Stroud District will be in addition to the traffic impacts associated with potential new development in South Gloucestershire. In the Pre-submission Draft Local Plan, Policy PS36 Sharpness New Settlement (pp.178-179) (initially allocated for 2,400 dwellings and increasing to 5,000 dwellings by 2050 as detailed at bullet 1) states the need to address (bullet 24) *“Any identified constraints and recommendations referred to in the Stroud Infrastructure Delivery Plan in this location.”* However, Policy PS34 Sharpness Docks (p.172) makes no general reference to the need to contribute towards any associated infrastructure enhancements required and identified in the IDP (as, for example, included in Policy PS36) and makes no reference to traffic impact mitigation at M5 Junction 14. It is requested that the policy is expanded to refer to the necessary infrastructure requirement at Junction 14.

Indeed, Highways England would recommend that Policies PS24, PS34, PS36 and PS37 are strengthened to explicitly reference the need for improvements at M5 Junction 14 in line with those identified in the TFR and IDP. It will need to be determined how much development can come forward before improvements are required, and the scope for individual developments to deliver or contribute to infrastructure needs.

## **Delivery Policies**

Delivery Policy DE11 District-wide mode-specific strategies (pp.268-269) is designed to underpin the objectives of the Sustainable Transport Strategy 2019 to achieve modal shift away from the private



car and to give priority to sustainable transport improvements above additional road infrastructure. It states that: *“Stroud District Council will work with key partners including Gloucestershire County Council and Highways England to develop District-wide strategies to enhance sustainable travel opportunities for all. This will integrate with patterns of growth coming forward in the District, as well as establishing conditions for existing movement patterns to be accommodated in as sustainable a way possible.”*

[Delivery Policy EI12 Promoting transport choice and accessibility](#) (pp.266-267) promotes sustainability through design and states: *“All developments should be planned in line with the Sustainable Transport Hierarchy”* and *“...opportunities to reduce the need to travel should be maximised...”*.

Delivery Policy EI12 requires that (p.267) *“All development proposals should have full regard to the transport impact on the strategic and/or local transport networks. Major development proposals, or those that are likely to have a significant impact on the local transport network, will be required to submit a Transport Assessment as well as a Travel Plan, to demonstrate that they have fully considered safe and suitable access by all modes of transport.*

*“The Transport Assessment will be required to establish the transport impact of the development proposals in the absence of mitigation. Where a severe impact is identified, mitigation will be required. Mitigation should be proposed in line with the sustainable transport hierarchy, with measures to reduce car trips through demand management viewed favourably. Measures which increase traffic capacity should not be seen as the default mitigation mechanism and will be accepted only where residual traffic impact remains severe after sustainable transport mitigation measures have been accounted for.”*

Highways England supports policy that seeks to ensure new developments are sustainably located and provide for journeys by alternative modes to the private car. However, Highways England consider that policy requirement EI12 would benefit from the inclusion of wording to clarify that mitigation measures will also be required to address adverse and unacceptable impacts on highway safety, as set out in NPPF paragraph 109 (NPPF, p.32). The Policy would also benefit from wording referencing the need to include the SRN and its junctions (M5 Junctions 12, 13 and 14).

Highways England would request that the Council continues to ensure that we are engaged from the outset of new development proposals, and throughout the pre-application process, to ensure that development proposals likely to impact on the SRN are supported by a proportionate and robust transport evidence base. The requirement for strategic development sites to be supported by a transport assessment and travel plan should be clearly signposted in the relevant site allocation policy.

Highways England request Policy EI12 to include reference to following requirements:

- that development proposals that have a significant transport impact are supported by an appropriate transport assessment consistent with national policy and guidance, and

- that additional traffic resulting from new development does not compromise the safe and efficient operation of the SRN.
- It includes a requirement that developers engage at an early stage with Highways England regarding development proposals and agree the scope of supporting information required.

## Infrastructure and Developer Contributions

Core Policy CP6 addresses necessary infrastructure and the approach to developer contributions (p.62 and IDP p.175). The preface text states that *“Most infrastructure required by a new development will be provided onsite by the developer and incorporated within the overall design concept for the scheme. In cases where off-site provision is required, various types of contributions can be secured, depending upon the nature of the proposed development.”* It is also stated that *“An Infrastructure Delivery Plan (IDP) accompanies but is not part of the Local Plan. It identifies the infrastructure that local service providers and the District and County Councils have established as key to delivering growth in the District and to meet the objectives of the Local Plan.”*

The Policy itself states that *“The Council will work with partners to ensure that infrastructure will be in place at the right time to meet the needs of the District and to support the development strategy.”* It goes on to state that: *“Where implementation of a development would create a need to provide additional or improved infrastructure and amenities, would have an impact on the existing standard of infrastructure provided, or would exacerbate an existing deficiency in their provision, the developer will be expected to make up that provision for those local communities affected. Where the developer is unable to make such provision, the Council will require the developer to make a proportionate contribution to the overall cost of such provision through a legal agreement and/or Community Infrastructure Levy. Various types of contribution will be used, including the following: i) In-kind contributions and financial payments ii) Phased payments and one-off payments iii) Maintenance payments iv) Pooled contributions v) A combination of the above.”*

In respect of the delivery of necessary infrastructure, the IDP (p.176) states: *“Public and private partnership will be vital to addressing these risks and appropriate governance arrangements will need to be put in place to implement mitigation. Given the cross-boundary nature of a number of complex issues highlighted in this IDP, partnership arrangements should include adjoining Local Planning Authorities in Gloucester, Cotswold and South Gloucestershire under the Duty to Cooperate.”*

Given the potential need to pool contributions and funding from a number of sources, Highways England consider this reinforces the requirement to clearly signpost necessary highway infrastructure improvements within the Draft Plan, to ensure clear links between Local Plan site allocation policy and the supporting evidence base. Furthermore, whilst Highways England will work collaboratively with the District Council and neighbouring authorities to explore funding opportunities and delivery routes, we would recommend that development management and site allocation policies should be strengthened to ensure that development comes forward in pace with the availability of necessary transport infrastructure. Whilst a contributions approach is proposed for significant infrastructure requirements, it will not be acceptable for development that has a severe or unacceptable impact on

the safe and efficient operation of the SRN to come forward ahead of the necessary supporting infrastructure.

As previously noted, Highways England recommends that references to specific SRN infrastructure requirements are included in the relevant site allocation policies as well as EI12 as set out above, to ensure that improvements identified as being necessary are clearly signposted within the plan policies.

Improvements may be required at an early stage in development to mitigate against unacceptable impacts. Therefore, the Council should work with developers and Highways England to determine appropriate infrastructure at M5 junctions 12, 13 and 14, safeguard land to enable the intervention, detail the triggers and timing for interventions, and devise a funding and delivery strategy for identified improvements.

Highways England would welcome an opportunity to work with the District Council to ensure that policies CP6, EI12 and DE11 reflect the highway and transport requirements of NPPF and DfT Circular 02/2013 which sets out the way in which the Highways England will engage with communities and the development industry to deliver sustainable development and, thus, economic growth, whilst safeguarding the primary function and purpose of the strategic road network.

## Summary

It is a requirement for the new Local Plan to be underpinned by a robust transport evidence base, which assesses the cumulative impact of the Plan on the SRN and identifies, in collaboration with Highways England, any necessary infrastructure and interventions to ensure that the transport needs of the Plan are met without resulting in a severe or unacceptable impact on the safe and efficient operation of the SRN. To this end, Highways England welcomes the preparation of the TFR and IDP, which provide a sound basis for the identification of necessary infrastructure improvements to SRN junctions to accommodate projected growth.

Nevertheless, Highways England would recommend that site allocation policies and Delivery Policies within the Draft Local Plan should be strengthened to clearly signpost the need for improvements at M5 Junctions 12, 13 and 14 and linked to allocations that are likely to impact on the SRN. At present, we consider there to be a disconnect between the findings of the TFR and IDP, and the policy commitments contained within the Draft Local Plan. Where improvements are necessary to support safe and sustainable Local Plan growth then this should be clearly highlighted.

The Local Plan should also set out how the delivery of development will be managed to ensure that necessary infrastructure is in place to prevent a severe or unacceptable safety impact on the SRN.

Whilst improvements to the SRN are identified in the TFR and IDP, the need for their timely delivery to mitigate adverse impact on the SRN and support the delivery of sustainable economic growth across the Plan area is not clearly signposted in the Pre-submission Draft Local Plan. Whilst Highways England will continue to work collaboratively with the District Council and neighbouring authorities to



explore funding opportunities and delivery routes for necessary infrastructure improvements, we recommend that development management and site allocation policies should be strengthened to ensure that development comes forward in line with the availability of necessary transport infrastructure.

We trust that our response will be helpful and assist you with your Local Plan Review, and welcome further engagement regarding the signposting of infrastructure delivery requirements and the development of the Council's funding and delivery strategy for identified improvements.

If you require further clarification on any issues, please do not hesitate to contact me.

Yours sincerely,

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Highways England - South West Operations

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