



STROUD DISTRICT COUNCIL

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Ms Lucas and Ms Wright
The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

5th December 2024

Dear Ms Lucas and Ms Wright,

On behalf of Stroud District Council (SDC), I am pleased to confirm that all tasks outlined in your letter dated 5th February have been successfully completed. The work carried out focused on addressing the concerns raised during the Examination in Public (EiP) relating to the Strategic Road Network (SRN), specifically at M5 Junctions 12 and 14. In addition, SDC has worked collaboratively to resolve infrastructure issues pertaining to the new settlements at Sharpness and Wisloe. Throughout this process, SDC has closely engaged with its key partners, including Gloucestershire County Council (GCC), South Gloucestershire Council (SGC), National Highways (NH) and the relevant site promoters, to ensure comprehensive solutions are in place.

In my view, the technical work centred around the design of required junction improvement schemes at M5 J12 and J14, to mitigate for planned growth and consequently ensure the draft Stroud District Local Plan (SDLP) is sound. In addition to the design work, SDC has worked closely with key stakeholders to achieve agreement on the deliverability of the required junction improvements. The consultation documents and Statements of Common Ground (SoCG) with GCC, SGC and NH demonstrate significant progress and provide confidence that there is a reasonable prospect of the mitigation being deliverable as required by the NPPF.

The consultation material and SoCGs demonstrate the following;

- There are deliverable junction designs which align with tests undertaken through strategic modelling, which demonstrate the engineering feasibility of mitigation schemes at both Junctions 12 and Junction 14. In the case of Junction 12, two potential options have been identified which would be taken forwards for further development.
- More detailed micro-simulation modelling has been undertaken, which demonstrates the effectiveness of the Junction 12 and Junction 14 schemes



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in addressing existing network issues and mitigating the impact of SDLP planned growth to the end of the Plan Period.

- Order of Cost Estimates have been produced which identify the likely total cost of each scheme. These costs have been benchmarked against, and are consistent with, recently delivered comparable schemes. National Highways considers that the costs of the schemes are within the range that it would expect.
- Close collaboration has taken place through scheme design, modelling and costing. There is no disagreement as to the effectiveness of the designs or the Order of Cost Estimates.
- There is a strong strategic rationale to support funding of the schemes, including Housing delivery, strategic clean energy, employment, and alignment with National Highways Route Strategy Objectives.

As discussed in Examination, the required funding approach is to seek Central Government funding for the schemes and raise 15% of the total scheme costs through local contributions. Whilst the modelling shows that a significant proportion of the impact on these junctions will come from outside Stroud District, there was a previous concern from stakeholders about use of funding from these sources. Therefore, for the purpose of this exercise, we have assumed that no local external funding would be available. We are comfortable that the 15% of local funding required would be achievable through developer contributions from planned growth within the Plan, without compromising the viability of that growth.

Discussions have been held with GCC and NH regarding the strength of Local Plan policy to ensure a clear link between strategic allocation sites, the Infrastructure Delivery Plan (IDP), and contribution requirements. All parties consider it likely that an acceptable form of wording can be achieved, and this can be added to the SDLP as a Main Modification. This will ensure that there is a strong policy basis to require contributions from strategic sites to deliver infrastructure. The form, effectiveness, and cost of mitigation has been established, as well as the level and affordability of local contributions.

SDC has been progressing high level discussions and has the support of the local Member of Parliament (MP), Dr Simon Opher, in making the case for infrastructure investment. It would not be possible at this stage of SDLP and scheme development to progress a formal funding bid. Furthermore, the recent change in government and subsequent spending review has also been a factor in the ability to gain formal government support for any infrastructure funding bid. Notwithstanding this, discussions are ongoing and SDC has presented a strong strategic rationale for funding the schemes, which is closely aligned with the Government's priorities of housing delivery, economic development, and energy transition.

The delivery of the proposed junction improvements is crucial to facilitating the SDLP housing requirement and ensuring that a robust framework for directing and



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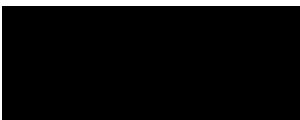
facilitating growth and determining planning applications is in place. This aligns with the Government's new approach to planning, infrastructure, and housing delivery, which emphasises the integration of strategic infrastructure with housing growth. As stated above, the Plan is further supported by the local MP, who is fully committed to advancing this initiative and securing the necessary external funding to help South Gloucestershire Council (SGC) successfully implement these vital projects. The MP's active involvement underscores the shared determination to deliver sustainable growth and improve local infrastructure for the benefit of the community.

Housing trajectories have been examined to understand the levels of housing which could be delivered on a year-on-year basis in the event that infrastructure delivery becomes a constraint to housing delivery. It is understood that NH considers it would not be possible to deliver any new housing growth that would have a traffic impact on Junction 14 without a mitigation scheme. It is also understood that there is a requirement for a scheme at M5 J12 to deliver the whole plan. The trajectories therefore consider a range of scenarios where sites which are identified as impacting M5 J12 and J14 are excluded from projected housing delivery. This is considered a highly robust assumption and demonstrates that SDC could continue to deliver the housing needs of its population, while allowing time to secure funding and deliver infrastructure.

In conclusion, the technical matters of design, modelling and delivery have been progressed and there is appropriate agreement with the relevant highways authorities on these matters for this stage of the project as required by the National Planning Policy Framework (NPPF), at submission. The level of local funding required has been identified and is affordable without rendering sites unviable. There is a strong strategic rationale for the scheme which meets Government priorities, and there is a reasonable prospect of Central Government funding being achievable. SDC can continue in the short term to meet its housing needs through sites which are committed and those proposed for allocation which do not impact on M5 Junctions 12 or 14. An adopted plan would allow SDC to continue to meet its housing needs, would significantly strengthen the case for funding and would enable progress to be made in seeking central government funding.

We respectfully ask you to consider the new evidence, which addresses the key concerns raised during the Examination in Public in regard to the SRN M5 J12 and 14 and the specific issues identified at the Sharpness and Wisloe new settlements. We kindly request that, in light of this updated information, you now allow the examination to progress to the outstanding hearing sessions, enabling further discussion and consideration of the Plan's details. We are confident that this will help move the process forward in a constructive and timely manner.

Yours sincerely,





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Kathy O'Leary
Chief Executive

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Chief Executive: Kathy O'Leary