

Dear Sir / Madam,

Thank you for consulting the Strategic and Local Plan (SLP) authorities (Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council) on the additional technical evidence to support the emerging Stroud District Local Plan Review (SLPR).

We note that the additional technical evidence provides updated growth assumptions to inform detailed modelling of the Strategic Road Network, principally M5 junctions 12 and 14. This evidence relates to the viability and deliverability of draft strategic site allocations. It is not clear from this how cross-boundary movements have been considered specifically cumulative impact which has formed a key principle in respect of the assessment of M5 Junction 10 currently being assessed through a live Development Consent Order (DCO) process. In this regard it would be helpful to understand assumptions underpinning future traffic growth from the SLP area, and how the distribution of these trips (cross-boundary) has been allowed for in informing the impact of the SRN, especially M5 junction 12 to 14. We are keen to avoid a cumulative impact of any SLP local plan growth in addition to SDC growth on the SRN and local roads and ensure Stroud District's schemes are sufficiently future proofed. We would ask that the planning team to engage directly with GCC as applicant on the M5 J10 DCO to draw out any elements of best practice that can be fed through the SLPR process.

In terms of the apportionment of costs, we note that paragraph 5.1.8 of consultation document EB133b states the following:

'To address concerns regarding the uncertainty surrounding neighbouring authority development plans, a range of funding scenarios are presented. This includes the "Core Scenario" which is the output of the updated F&D Plan which retains a level of funding allocation from neighbouring authorities. This also includes a "Worst-Case Scenario" which assumes that all of the contribution from local development will originate from SDC LPR allocations. This scenario is to be progressed for onward viability testing, in order to ensure that there is no reliance on contributions from other Local Authority areas. However in practice, it is considered more than likely that some funding would be attributable to growth within these local authority areas (i.e. as per the 'Core' scenario).'

The SLP authorities are pleased to see this statement given the SLP is at an early stage of preparation and we have not yet determined the scale or location of growth to be planned for. Any assumptions must therefore be treated with a degree of caution.

From earlier responses to the SLPR, the council will be aware of concerns relating to the local road network, for example St Barnabas roundabout in Gloucester City. It is noted that the focus on the evidence is mitigation and costs to M5 junctions 12 and 14. However, there will be additional impacts to the local network that require adequate funding to deliver interventions and the councils are keen to ensure these are adequately understood and funding sources identified.

If you require anything further please do not hesitate to get in touch.

Yours faithfully,

**Adam Gooch**  
Strategic and Local Plan Manager

---

Place



[www.gloucester.gov.uk](http://www.gloucester.gov.uk)