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28th November 2017

Dear Planning Strategy Team,

STROUD DISTRICT LOCAL PLAN REVIEW: ISSUES AND OPTIONS PUBLIC CONSULTATION - M5 J11A, J12, J13, J14, A417(T) AND A40(T)

Highways England welcomes the opportunity to comment on the 'Issues and Options Paper' (I&OP) dated October 2017, prepared as part of the Stroud Local Plan review, extending its period up to 2036.

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 junctions of M5 J11a, J12, J13. Despite being in neighbouring districts, M5 J14 (South Gloucestershire), the A417(T) (Tewksbury) and the A40(T) (Gloucester), are junctions and routes also affected by development positioned in Stroud's District. It is on the basis of these responsibilities that Highways England has provided the comments that follow in this letter.

Highways England is keen to ensure that transport and land use planning policy is closely integrated. In this respect, Highways England draws your attention to "The Strategic Road Network - Planning For The Future - A Guide To Working With Highways England On Planning Matters", Highways England's Licence issued by DfT and 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, so 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. In order to constructively engage in the local plan-making process, we require a robust evidence-base so that sound advice can be given to local planning authorities, in relation to the appropriateness of proposed development in relation to the SRN. This also extends to include transport solutions that may be required to support potential site allocations.

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 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 (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, namely the NPPF and NPPG.

We acknowledge that at this stage of the Local Plan Review process, stakeholder's views on the emerging issues and options of distributing and managing future development are requested. Comments regarding this strategy are set out below.

Local Plan Vision

The Government requires Stroud District Council to review its Local Plan every 5 years, and the I&OP has been prepared as a first stage of the review process, eventually concluding with the adoption of a new Local Plan anticipated for 2021/22.

The I&OP refers to the key issues, challenges and needs of the district, covering the economy, housing, the environment and wellbeing, etc. A number of these challenges are shared by Highways England in our responsibility for the SRN. The challenge of addressing high levels of daily commuting out of the district, particularly to Bristol, Gloucester, Cheltenham and Swindon (as included in I&OP point no.3) is of concern to Highways England, as this generally involves journeys via the SRN.

Highways England shares many of the same goals as the district: in wanting to work closely with local authorities and statutory agencies to investigate transport improvements (No.4); ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development (No.12); and in achieving a better transport system, to help reduce CO2 emissions, This includes an emphasis on limiting car use by extending the cycling and walking network and making improvements to public transport (No.18).

Development Strategy

The I&OP suggests that the new Local Plan will need to allocate further land for housing and employment uses, although states that the amount of future growth for the review period 2016-

2036 has not yet been identified. It is stated that discussions will be held with neighboring authorities to quantify these needs, however it is important that potential strategies for distributing future growth, potential locations and supply options are thoroughly investigated at an early stage.

The existing and adopted Local Plan provides a focus on positioning development in a linear pattern along the M5 corridor, with the Hunts Grove, Quedgeley East Business Park and the Stonehouse sites positioned in line with that criteria.

In terms of future allocations, the I&OP considers various options for development distribution anticipating that this could materialise over a series of small sites that integrate with existing neighborhoods, or alternatively could include a smaller number of larger sites distributed around larger villages and towns. A more radical option of creating a new town or village is also suggested, again likely to be in a linear pattern along a transport corridor.

The I&OP identifies four broad locations as potential considerations to place development. These include

- G1 South of Hardwicke (housing/community uses)
- G2 Whaddon (for housing/ employment/ community uses)
- G3 South west of Brockworth (for housing/ community uses)
- G4 South of M5/J12 (for employment uses)

The above sites largely continue the focus of allocating sites along strategic transport corridors, with the M5 and A417 serving the majority of these sites. Paragraph 16 of the DfT Circular 02/2013) recommends development is '*promoted in locations that are or can be made sustainable, that allow for the uptake of sustainable transport modes*'. This should include locations with good access to transport modes that can substitute travel by private car, when considering the commuting locations that would otherwise travel via the SRN. Access to high frequency bus corridors and rail stations would offer the greatest benefit to limiting car trip generation from newly allocated development sites.

Applying the principals of paragraph 9 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section that is already operating at over-capacity levels, or cannot be safely accommodated, i.e. a development which adds traffic to a junction which already experiences road safety issues; would increase the frequency of occurrence of road safety issues; or would in itself cause those road safety issues to arise, would be considered to have a severe impact.

These principles are reflected in the NPPF (paragraph 162) which requires that local planning authorities work with other authorities and providers during the Plan making process to assess the quality and capacity of infrastructure for transport and its ability to meet forecast demands. The aim of this cooperation is to arrive at a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development (NPPF paragraph 181).

Pursuing sustainable development requires careful attention to viability and costs. The sites and the scale of development identified in the Plan should not be subject to such a scale that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as infrastructure contributions or other requirements, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable (NPPF paragraph 173).

It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion (NPPF paragraph 177).

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe (NPPF paragraph 32).

For the Plan to satisfy the requirements of NPPF, it would need to be supported by an assessment of the infrastructure necessary to ensure that traffic impacts are not severe. Highways England would be content with the proposed allocations, if the identified infrastructure satisfied the requirements of Paragraph 9 of Circular 02/2013.

The Local Highway Authority will have their own criteria and it should also be noted that the requirements of the Plan, in terms of providing the necessary housing, may require additional infrastructure to be identified, particularly in relation to existing issues which would be beyond the remit of Highways England to consider.

Strategic Road Network Considerations

Highways England draws attention to the current performance of the SRN within and positioned just outside of the Stroud District boundary, which will need to be taken into account in the evidence base supporting the new Local Plan. Typically, the SRN junctions within the district are constrained at peak times which can result in mainline queuing, for example at M5 J12.

Highways England is also aware of existing capacity constraints at M5 J14, which is positioned in South Gloucestershire but influenced by sites in Stroud. Surveys and observations suggest the M5 northbound off-slip in particular, is close to capacity during weekday peak hours. As with M5 J12, 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 a severe safety impact on the SRN.

In addition to SRN junctions located in the Stroud District, Highways England will require capacity assessments of M5 J14, to understand the capacity constraints, and the impact that Stroud District allocations will have on the capacity and safety of this junction. If necessary, infrastructure improvements may be required to be brought forward to ensure the impact of the Plan Review is not severe and can be safely accommodated.

Highways England is already working collaboratively with Stroud District Council in respect of M5 J14, and this will continue as part of the Local Plan development process. Highways England would be pleased to work with Stroud District in respect of identifying Local Plan impacts and solutions to other parts of the SRN.

The A417 (T) linking the M5 at Junction 11a to the M4 in Swindon, partially contains a single carriageway route of the A417 that experiences significant congestion, high accident rates and long delays. This A417 'missing link' and its connection with the M5 should also form a consideration of the transport evidence base submitted to support the updated Local Plan, as this corridor runs close to the Stroud District boundary.

In accordance with Paragraphs 9 and 10 of the DfT Circular 02/2013, '(9) development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the SRN, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. (10) However, even where proposals would not result in capacity issues, the Highways Agency's (Highways England's) prime consideration will be the continued safe operation of its network.'

It is therefore the case that any development site having a sizable impact on a SRN junction, which increases the length of the mainline queue, and potentially increases the period for which mainline queues occur, would be considered as having a severe impact. In such a circumstance, mitigation would be sought. Highways England would expect this mitigation to be identified and agreed at the Local Plan stage to support any development allocations identified. This should take the form of an Infrastructure Development Plan and transport strategy accompanying the new Local Plan.

Conclusion

Overall Highways England is content with the I&OP, acknowledging that as expected, its priorities and vision are 'high level' at this stage. Highways England's concerns include the potential for site allocations along strategic road corridors i.e. the M5 and A417 which may significantly increase demand at constrained junctions during network peak periods, resulting in severe safety impacts.

Development should be promoted in locations that are, or can be made sustainable, allowing and encouraging the uptake of sustainable transport modes.

With the Local Plan strategy in its initial stages, the I&OP is prepared in advance of the transport evidence base needed to support it. This will however be required. At this time, an important aim of the Local Plan review from our perspective is the duty to co-operate. Highways England looks forward to being closely involved in the evolution of the Stroud Local Plan going forward. Proposals for new development will need to be supported by the appropriate level of robust transport evidence base, and mitigation to address any severe impacts on the SRN. This evidence base must conform with the NPPF and Circular 02/2013.

We trust that our response will be helpful and assist you with your Local Plan review. If you require further clarification on any issues, please do not hesitate to contact me.

Yours sincerely

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