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## **FAO The Inspectors appointed to examine the Stroud District Local Plan Review: Victoria Lucas and Yvonne Wright**

Dear Charlotte,

This correspondence is further to your letter of 24<sup>th</sup> October 2023 sent to Gloucestershire County Council (GCC), National Highways (NH), Stroud District Council (SDC) and South Gloucestershire Council (SGC), which requested additional information on three key areas.

- Comments on the technical note submitted by SDC dated 16<sup>th</sup> October 2023;
- The identification of a scheme sponsor for the Junction 14 improvements; and
- Development of an agreed joint Action Plan.

The Inspectors are fully aware of GCC's views to date, given that GCC officers have continued to actively engage and responded to the additional requests for clarification and information to help support the Stroud District Local Plan. GCC officers and our consultants continue to actively engage in discussions and work in partnership with all relevant stakeholders.

GCC remains fully committed to the achievement of sustainable growth and housing / employment delivery in Stroud District and Gloucestershire as a whole. It is imperative, however, that this sustainable growth must come forward with the associated required strategic and local infrastructure and we have continued to engage with SDC officers and NH to attempt to reach an agreed proposed way forward.

I provide detailed answers to the specific questions from the Inspectors in respect of the additional evidence from SDC (Technical Note from AECOM: M5 Junction 12 & 14 Impact Apportionment) and a detailed review of SDC's Action Plan – both as published in the Examination in Public Library. I will restrict my responses to J12, as J14 is outside of the remit of GCC as the highway authority. I understand that NH will be providing further detailed comments on both of these matters in their response to you.

## Junction 12 Feasibility Study

Following receipt of your letter, GCC has worked with our term consultants, AtkinsRéalis, in order to develop a comprehensive programme to fulfil a brief for a Junction (M5) Feasibility Study which will demonstrate delivery of a highway intervention at J12, with an indicative scheme construction cost which could then be used for initial cost apportionment discussions. This brief has been drafted and shared with both SDC and NH and, at the time of writing, it is hoped and assumed that all parties will reach agreement regarding the significant level of work that needs to be completed in order to determine the appropriate type and scale of intervention at J12.

To confirm, there is, at present, no agreed designed solution for this junction, but the agreed brief will take account of previous suggested highway interventions. As part of this brief there is a timetable of delivery that has been shared with both SDC and NH. This demonstrates that, in order to complete the required level of baseline modelling and design work needed to establish a reasonable cost estimate for apportionment, that a realistic, but tight, timescale for delivery is the end of May 2024. (This assumes an immediate start to this commission).

### Indicative Programme from emerging draft M5 J12 Feasibility Study Brief

Project set up and agreement of brief	Mid-October to December 2023
Stage 0: Scoping and key stakeholder meetings	Mid-October to December 2023
Stage 1: Establish baseline/ constraints/ identify gaps	Mid-October 2023 to January 2024
Milestone Technical Notes	Drafted and finalised by end February 2024
Stage 2: <b>Optioneering including modelling, design and costs</b>	February to <b>May 2024</b>
Milestone Technical Notes	Drafted and finalised by end June 2024
<i>Note: Programme is dependent on availability of data, timely approval of technical notes and deliverables. Together with a realistic programme of collaborate meetings between stakeholders.</i>	

GCC officers and our term consultants are in agreement that this is an achievable timescale for delivery, but it is reliant on timely agreement of the output information with highway authorities and an immediate start. The basis of the capacity analysis will use the recently revalidated NH VISSIM model. This proposed timescale has been added to the revised SDC Action Plan (the final version of which will be sent to you via SDC) to demonstrate when the expected activities will be completed and outputs available. Since sharing this information with SDC, officers have suggested that the timescale should be shortened to provide the evidence and information for cost apportionment by the end of March 2024. I can advise that this is not possible due to the nature of the programme of delivery that is needed and the number of

interdependent activities, including option development and sensitivity testing, etc., that all need to be carried out in order to inform the optimum solution and design. This work is needed to enable the cost estimates to be developed. It should also be noted that there are currently no design drawings for any proposed improvement at J12, which are necessary in order to develop a cost for apportionment between identified SDLP proposed developments.

The level of work that is proposed will be sufficient to demonstrate to NH that a feasible solution has been developed and that it could then be considered for progression through the appropriate business case development stages in the future, if and when funding for such business cases becomes available.

Following the development of the scheme cost, the cost apportionment methodology to be used will be developed independently by SDC, as it can be developed alongside the feasibility study detailed above. GCC's consultants have included time to carry out a high-level review of the cost apportionment methodology to be developed by SDC.

### **Impact Apportionment**

The Technical Note *M5 Junction 12 & 14 Impact Apportionment* prepared by revision 3 (submission) dated 16<sup>th</sup> October 2023 drafted by AECOM and published on the SDLP Examination Library has been reviewed by GCC officers and our term consultants, AtkinsRéalis. The technical note deals with the 'smaller' developments that have not been identified by SDC to cause an identifiable impact on J12, plus the larger strategic sites that SDC believe could continue to be progressed with Grampian Conditions in place linked to the major infrastructure improvements needed at J12.

For your information, detailed technical comments have previously been provided by GCC officers direct to SDC's consultants on the data used in the Technical Note. Initial concerns that the Technical Note was based only on data for the AM peak and that the assessment method was not considered appropriate have resulted in additional tables being sent to GCC on 15<sup>th</sup> November 2023 which now include the following missing information.

- The corresponding PM peak hour analysis, which was previously omitted;
- The alternative assessment requested by GCC based on the 'total vehicles for links representing an inbound movement' on the network at M5 J12 alongside their previous methodology which presented the results based on the 'average of all network links'; and
- The consideration of the PS32 allocation (Quedgeley East Business Park extension).

I draw your attention to the revised results in the additional tables received by GCC as the PM peak hour analysis shows a higher impact (13% to 14%) compared to the AM peak (4% to 6%) for the "progressed sites" i.e. the non-IDP specified sites for scheme contributions, as a proportion of the total junction traffic at J12 compared to the 2040 'Do Minimum' Scenario flows. Such an impact, particularly that shown for the PM peak, cannot be described as 'not considered significant' and GCC raise concerns in the quantification adjectives used in the Technical Note for the level of impact of developments on J12 as they are considered misleading.

GCC is particularly concerned that in drawing their conclusions, SDC are implying that >8,600 dwellings (based on the projected housing supply information provided in the *'Housing supply which could be delivered without sites impacting upon M5*

*Junctions 12 or 14'*) could come forward prior to any motorway junction scheme improvements. [In a meeting with SDC there was also reference to suggest that 70% of the Plan could be delivered on this basis, but we cannot reconcile this figure with the Plan's housing numbers.]

Therefore, in order to potentially alleviate GCC's concerns, there is still a need to comprehensively model the traffic impact of the "progressed sites" ahead of any J12 mitigation scheme. Ideally, such assessments should be carried out on an individual site-by-site basis, using the NH J12 VISSIM model to ensure compatibility with the ongoing feasibility work.

Overall, GCC remains concerned that the Technical Note has not been based on any new modelling and is simply a summarised percentage impact assessment of the developments based on the original Infrastructure Delivery Plan (IDP) and Funding Delivery Plan, both documents provided within the EiP Library. GCC is therefore not able to support the conclusions drawn by AECOM on behalf of SDC that *"the final table in Appendix 2AC6 is a valid representation of housing sites which can come forward without a "severe" impact on Junction 12. It is thus a trajectory without an unacceptable impact on the M5 junctions"*.

In addition, GCC are also aware of that NH have previously stated at the EiP that *"M5 J12 is already sensitive to congestion and, with significant Plan development in the area, the junction is very likely to suffer severe capacity issues within the next decade. Based on the data [previously] shared .....the need for [an] intervention at M5 J12 will be early in the Plan period. The main point of concern for National Highways at M5 J12 indicated in the traffic model is the westbound off slip (from Cheltenham), with queueing already shown to extend close to the full length of the slip road in 2022 and [this is] likely to worsen over time even if growth is lower than forecast in the Stroud Local Plan traffic model and closer to the historical norm."*

This issue remains of great concern to both NH and GCC. In terms of likely congestion and potential impact on motorway safety.

### **Action Plan**

The Action Plan developed by SDC has been annotated by GCC and circulated to SDC for comment (as stated above, the final version will be sent to you via SDC). The proposed dates for the potential delivery of the elements of work that GCC have agreed that our term Consultants AtkinsRéalis will carry out have been included, but do assume an immediate start. As noted above, I am of the belief that the timescales that SDC are requesting for an end date of March 2024 for the completion of the feasibility study is unrealistic and is not considered achievable. GCC maintains that an end May 2024 delivery can be achieved, but it is subject to an immediate start and ongoing positive collaboration between GCC, NH and SDC officers which I anticipate will continue through the J12 Working Group meetings that have been taking place regularly.

GCC appreciates the opportunity to provide further comments on the SDLP and I hope that the additional information provided comprehensively answers the Inspectors' questions and provides reassurance that GCC is proactively acting as scheme sponsor for the further work relating to J12, (although this is limited to the feasibility study only, and this will be done on a cost sharing basis with SDC).

Please let me know if you require any further information regarding these matters.

Yours sincerely



**Pete Bungard**  
**Chief Executive**