

Consultation Summary M5 J12

Background

Stroud District Council (SDC) submitted the draft Local Plan to the Planning Inspectorate for Examination in October 2021. Hearing sessions commenced in March 2023 and were paused in June 2023 to allow a summer break. The majority of the hearing sessions have already been held and have covered all strategic and local site allocations and most of the policies set out in the draft Local Plan. Details of the Examination and the Examination Library are available on the Local Plan Examination webpage.

During the Examination summer break, the Inspectors wrote to the Council on 4 August 2023, ID-010 in the Examination Library, setting out concerns with three areas of soundness:

1. The capacity of the Strategic Road Network (SRN), specifically the capacity of M5 Junctions 12 and 14 to accommodate proposed housing growth;
2. The proposed passenger train service and bespoke Mobility as a Service transport scheme (MaaS) at Strategic Site Allocation PS36 Sharpness New settlement on the grounds of viability and deliverability.
3. The provision of the pedestrian and cycle bridge over the M5 motorway at Strategic Site Allocation PS37 Wisloe New settlement on the grounds of viability and deliverability.

Additional information and a commitment to address the Inspectors' specific viability and deliverability concerns relating to Strategic Site Allocations PS36 Sharpness new settlement and PS37 Wisloe new settlement were submitted to the Inspectors in September 2023.

A Joint Action Plan with National Highways (NH), Gloucestershire County Council (GCC) and South Gloucestershire Council (SGC) to address issues relating to the capacity of the SRN was submitted to the Inspectors on 30 November 2023.

A further letter from the Inspectors dated 5 February 2024, ID-015 in the Examination Library, granted a pause in the Examination until December 2024 to allow the work set out in the Joint Action Plan and additional work relating to PS36 and PS37 to be completed and a six-week period of public consultation on the outcomes of the workstreams to be carried out.

Summary of representations:

The outcomes of this additional work were published for consultation between Monday 9 September to 5pm on Wednesday 23 October 2024. The representations will be published in full alongside this summary document, but as requested by the Inspectors a summary of comments and responses is available below.

Q. Are the proposed works to M5 Junction 12 effective and do they overcome the junction capacity constraints to local plan growth?

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
002	Nexus Planning on behalf of Crest Nicholson Operations	The proposed junction works are not effective in accordance with the appropriate considerations described at paragraph 35 (c) of the NPPF. As there is no certainty that the proposed junction works can be delivered during the plan period the evidence provided by the local planning authority fails to meet this test.	The evidence presented has provided a scheme design and demonstrated through modelling that the design will be effective in mitigating the impact of the Local Plan, as well as accommodating traffic demand from background sources and development outside of the District. A costing exercise has taken place, which has enabled the 15% local funding, which is a standard requirement of central government funding bids, from local sources to be identified and tested from a viability perspective. The strategic rationale for the scheme, and wider benefits, has been set out, showing that the scheme will be an attractive proposition for central government funding. SDC is in discussion with central government to progress this matter.

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		<p>Regarding the apportionment of funding to meet the costs of the proposed infrastructure works, which are in development and are yet to reflect the full range of costs that will apply, there is a lack of clarity regarding the sources of funding, their timing, and certainty. The submitted evidence attests to an absence of any agreement at the local level regarding how the anticipated local component of funding (15% of the whole) will be apportioned.</p>	<p>The scheme design, modelling and funding overview has been prepared through joint working with neighbouring authorities and NH, who are comfortable with the technical aspects of the proposals. The Plan is therefore considered to meet the requirements of NPPF paragraph 35c.</p> <p>In relation to scheme costs, the level of detail provided on scheme costs is proportionate to the current planning stage. The costs have been benchmarked against comparable motorway improvement schemes and include significant contingency and optimism bias to account for the various unknowns which would be present for any motorway improvement scheme at this stage. Discussions with stakeholders have included ensuring that there are allowances to cover the full range of costs that would apply. NH has advised that it considers the Order of Cost Estimate to be within the range that it would expect.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government</p>

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		<p>The cross-boundary working in this respect has not been effective in producing a clear and costed solution. The evidence does not provide the clarity sought by the Inspectors and fails to address the fundamental soundness concerns raised in correspondence between August 2023 and March 2024. The failure to provide clear and concise answers to the questions set out means that the proposed works are not effective because they lack the required certainty of delivery necessary to facilitate the strategic growth on which the spatial strategy of the Local Plan Review relies.</p>	<p>investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable. The apportionment of funding at a local level is to be agreed at the later stages of the EiP.</p> <p>SDC, NH and GCC have worked closely through the EiP pause period, meeting regularly and discussing the development of scheme design and costing. The output has been agreed scheme designs, modelling and costing for J12 and J14. The fact that there are two potential options for J12 shows that there are two different potential solutions which should both be taken forward for further consideration. This does not show a lack of clarity.</p> <p>SDC consider the cross-boundary working to have been effective – please refer to SoCGs.</p> <p>SDC is confident that the level of information provided has fully addressed the Inspector’s requirements as outlined in their letter of 5th February 2024 and is confident that the</p>

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			scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
003	McLoughlin Planning on behalf of Seven Homes	SevenHomes is concerned that in respect of both Junction 12 and Junction 14 upgrades, questions have to be raised about the deliverability of these works and, therefore, the Plan’s “effectiveness” in soundness terms.	Comment is noted.
		SevenHomes does not dispute the costs in the AECOM Report (EB113B) or other aspects of the technical work presented. Instead, it wishes to highlight points associated with the Reg 19 Local Plan, the Infrastructure Delivery Plan and EB133B.	Comment is noted.
		Paragraph 2.3.3 sets out that the scheme costs for the two junctions range from £140 million to £210 million (junction 12) and 100 to 120 million (junction 14).	Comment is noted. These paragraph numbers refer to EB133b.
		The IDP (EB110) paragraph 2.1.1 identifies the following costs for upgrade packages: <ul style="list-style-type: none"> • Junction 12 – £15.6 million • Junction 14 - £ 27.3 million 	Comment is noted.

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		<p>The figures now presented in EB133B are significantly higher than anticipated in the EB110 and the Local Plan by approximately £100 million per junction. This leads to the inevitable question of how this infrastructure can be delivered through the various strategic sites without government intervention and how realistic government intervention is.</p>	<p>Costs for the junction improvements have been revised upwards following the recent and more detailed design and costing exercise outlined in EB133a and EB133c. The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p>
		<p>The recent letter by the Secretary of State Matthew Pennyhook about examining plans states:</p> <p>“In 2015, the Government set out an expectation that Inspectors should operate "pragmatically" during local plan examinations to allow deficient plans to be 'fixed' at examination. This has gone too far and has perversely led to years of delays to local plan examinations without a guarantee that the plans will ever be found sound, or that the</p>	<p>Comment is noted.</p>

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		local authorities will take the decisions necessary to get them over the line. This has to end.”	
		It is our position that the Inspectors’ have been very pragmatic, but is it clear from the evidence presented through this consultation that the major issue of infrastructure and its delivery in respect of Junctions 12 and 14 still needs to be ‘fixed’. The Minister’s letter does empower Inspector’s to make those tough decisions and recommend that Plans are withdrawn. This was welcomed by the Chief Executive of PINS.	The Inspectors’ decision to pause the examination was taken prior to the SoS’s letter. SDC is confident that the level of information provided has fully addressed the Inspector’s requirements as outlined in their letter of 5 th February 2024 and is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth. Therefore, SDC considers that the Examination can re-open and continue to a positive conclusion.
		Given the above, SevenHomes continues to express its concern about the soundness of the Plan. The information on J12 and J14 underline that the Plan is ineffective, as the cost evidence base has flaws.	Comment is noted.
005 Email	Knight Frank on behalf of Harper Crewe Limited	Based on a review of the available evidence base (EB133 to EB137), there appear to be clear omissions of evidence that are required to fully inform the feasibility of the junction improvements. In particular, there is no available	Evidence as to the design development, modelling and costing of enhancements to J12 is considered to have been provided to a suitable level of detail in EB133c. The modelling results have been shared with key

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	<p>It should be noted this representor did not follow the consultation questions set by the Council and did not provide a summary of their comments.</p> <p>Therefore the summary provides a best understanding of their lengthy response.</p> <p>This summary has therefore been provided by the Council based on the report submitted.</p>	<p>modelling report for J12 akin to the M5 J14 Improvement Scheme Consultation Report (AECOM, September 2024) which sets out the design development, modelling and costing exercise for J14. A similar level of evidence was expected for J12, but is unavailable. This is essential and should be provided to inform J12, as the modelling is crucial to ascertaining if the junction improvements, including their design and costings, will be able to accommodate the growth. Without this, the options for J12 should not be relied upon.</p> <p>Setting aside this point of principal, we would need to understand why the costs in the Junction 12 Optioneering Report (EB133c) appear to differ from those included in Table 2.1 of the Funding Overview Document (EB133b). For example, the upper limit of costs stated in the Junction 12 Optioneering Report are £134.5M (page 15 refers) with the equivalent value in Table 2.1 being £210M. From the supporting text at para 2.3.5 of EB133b it would appear assumptions have been made for traffic management and include contingencies.</p>	<p>stakeholders, including the local highway authorities and National Highways, which have reviewed and accepted the modelling methodology and results that Option 2a and Option 3a are suitable for future consideration.</p> <p>The reference to £134.5m in EB133c is the cost for Option 3a, excluding inflation. The full scheme option costs, including inflation are reported in Table 3-2 of EB133c.</p> <p>A cost range of c.£140m-£210m has been included in EB133b to account for the two options for J12, and to include inflation. As set out in 2.3.4, the costs are presented as a broad range to demonstrate the scale of scheme cost and funding requirement, and that the greater range for J12 is due to there being two potential options. The reader is</p>

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			<p>directed to the individual reports for J12 and J14 for the detail behind the cost estimates.</p> <p>The level of detail provided on scheme costs is proportionate to the current planning stage. The costs have been benchmarked against comparable motorway improvement schemes and include significant values for contingency and optimism bias to account for the various unknowns which would be present for the design of any motorway improvement scheme at this stage. Discussions with stakeholders have included ensuring that there are allowances to cover the full range of costs that would apply. NH has advised that it considers the Order of Cost Estimate to be within the range that it would expect.</p>
006 Email	Strategic and Local Plan (SLP) authorities	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	Cross-boundary impacts and growth from within the SLP area (Gloucester, Cheltenham, Tewkesbury) have been assessed appropriately using the traffic flow outputs from strategic modelling. This is in line with DfT methodology, and the strategic model has been accepted as appropriate by GCC and

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		<p>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.</p>	<p>NH. Further information on the strategic modelling is available in EB61 and EB98.</p> <p>The scheme design, costing and assessment has been undertaken in consultation with GCC, SDC and NHs through a range of regular meetings and information exchange over the EiP pause period. Discussions have included the ongoing DCO process which has ensured that that best practice from the DCO process for J10 has been considered within this work.</p>
		<p>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</p>	<p>This is correct and the comment is noted. The strategic traffic modelling shows that there will be traffic impacts from planning applications outside of Stroud District. These sites will need to contribute towards junction improvements, however, the worst-case scenario has been tested to ensure that the SDC Local Plan does not rely on these sites due to the level of uncertainty at this time.</p>

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		<p>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).’</p>	
007 Email	<p>RPS on behalf of Cotswold Homes</p> <p>It should be noted this representor did not follow the consultation questions set by the Council and did not provide a summary of their comments.</p>	<p>Nonetheless, the lack of clarity on the agreed way forward in delivering the necessary highway and public transport infrastructure continues to raise significant soundness concerns with the Plan and which remain unresolved. In this context, we respectfully request the Local Plan Inspectors should consider the recommendation on plan examinations issued by Minister of State Matthew Pennycook MP in his letter to PINS dated 30 July 2024. In that letter, he stated that:</p> <p><i>“Pragmatism should be used only where it is likely a plan is capable of being found sound with limited additional work to address soundness issues. Any pauses to undertake additional work should usually take no more than six months overall. Pragmatism should not be used to address fundamental issues with the soundness</i></p>	<p>The Inspectors’ decision to pause the examination was taken prior to the SoS’s letter. SDC is confident that the level of information provided has fully addressed the Inspector’s requirements as outlined in their letter of 5th February 2024 and is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth. Therefore, SDC considers that the Examination can re-open and continue to a positive conclusion.</p> <p>The evidence presented has provided a scheme design and demonstrated through modelling that the design will be effective in mitigating the impact of the Local Plan, as well</p>

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	This summary has therefore been provided by the Council based on the on the report submitted	<i>of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall...This new approach will apply to all plans with immediate effect. Existing pauses already agreed by an Inspector should remain in place unless the Inspector considers there is insufficient progress being made.” (RPS emphasis)</i>	as accommodating traffic demand from background sources and development outside of the District. A costing exercise has taken place, which has enabled the 15% local funding, which is a standard requirement of central government funding bids, from local sources to be identified and tested from a viability perspective. The strategic rationale for the scheme, and wider benefits, has been set out, showing that the scheme will be an attractive proposition for central government funding. SDC is in discussion with central government to progress this matter.
008	Gloucestershire County Council	The additional evidence concludes that an effective solution to overcome the junction capacity constraints at Junction 12 can be achieved. However, at this very early stage in scheme design, it is not possible to confirm which option (or even a future variant) performs best.	Comment is noted. The key point is that there is an effective mitigation solution which can be taken forwards. A decision on the preferred option can be made further down the line.
		Regarding the funding strategy, GCC officers acknowledge that some of the concerns raised previously are now addressed. As stated above, GCC officers remain concerned about the scale of	SDC welcomes GCC’s acknowledgement that progress has been made and the number of areas of concern has been significantly reduced. SDC is continuing to promote and

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		<p>the total funding needed for two motorway junctions but is happy to continue working with SDC to strengthen the Stroud Local Plan policy position on this issue. GCC officers' experience suggest that it may be possible for public sector funding for one of the junctions to come forward in the plan period, subject to Government funding coming forward, but it would be extremely unlikely for both, unless there was a fundamental change in government's approach to road investment.</p>	<p>discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth. SDC welcomes GCC's willingness to continue working with SDC to promote the improvements to the motorway junctions.</p>
		<p>GCC officers would like to work with Stroud District Council to ensure the policies in the Local Plan enable the developer contributions required for J12, 14 and the local road network to accrue over a longer period.</p>	<p>Comment is noted. This has been discussed with the Transport Working Group, with a view to proposing a main modification to the plan post-examination to provide a stronger policy hook to the clear intention that sites contribute to infrastructure.</p>
		<p>GCC officers would like to note that funding is not only required to mitigate the impact on the motorway, but also on the local road network. These local road network impacts were identified in the original modelling; however, they have not been confirmed through the work on the M5 J12 Feasibility Study and this work will need to be updated and costed as part of any future stages of work.</p>	<p>Improvements to the wider highway network have been identified through the strategic modelling and are included in EB110 (IDP). The purpose of the EiP pause is to further develop the proposals for M5 J12 and J14, and not to superseded or replace the local transport schemes in the IDP.</p>

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009 Email	Pegasus on behalf of Robert Hitchins Ltd	<p>The technical evidence raises fundamental concerns about the soundness of the Plan as key issues in respect of the process for securing the delivery and timing of the major improvements to Junction 14 of the M5 within the plan period, so that proposed site allocations can be completed, have not been answered.</p> <p>Without information on the timescale for the delivery of the scheme and how the remaining 85% shortfall in funding is going to be secured, this undermines the delivery and therefore effectiveness of the Plan.</p>	<p>Comment is noted.</p> <p>The timescale of delivery of the M5 J12 and J14 schemes only affects the delivery of some of the houses within the Local Plan. A worst-case scenario assessment of assuming that no housing which adds traffic to either J12 or J14 can come forwards has been applied to the Housing Trajectory, presented in EB134. This shows the level of housing which can come forwards without reliance on these schemes. As has been discussed extensively in the EiP, SDC understands NH's position that no new traffic can be added to J14 without mitigation. It is also accepted between SDC, GCC and NH that, based on modelling commissioned by GCC, an improvement scheme will be needed at J12 early in the Plan period. NH wishes to understand the trigger points in more detail,</p>

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			<p>and therefore has committed to undertaking additional trigger point modelling. This is underway at present, and NH intends to be in a position to update the EiP when it re-opens.</p> <p>The strategic case for how the 85% of funding will be achieved is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p>
010	Carney Sweeney on behalf of Redrow Homes	EB133b suggests there is spare capacity at M5 Junction 12. This should be defined in terms of the number of dwellings that could be delivered before an upgrade is required.	WSP has undertaken Vissim modelling as part of their work at J12 to test the point at which the scheme is required. This has tested forecast growth at 5% increments. This suggests that improvements to J12 would be required within 5-10% of expected growth. NH wishes to understand the trigger points in more detail, and therefore has committed to

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		<p data-bbox="660 523 1377 911">EB133c discounts an interim scheme for M5 Junction 12. The costs and timescales associated with a 'full scheme' will likely delay the delivery of housing. South of Hardwicke is a sustainable location for development and an interim scheme may be needed to deliver the necessary housing trajectory. An interim scheme for M5 Junction 12 should therefore not be discounted and should be retained for further development alongside the full scheme.</p>	<p data-bbox="1377 336 2047 512">undertaking additional trigger point modelling. This is underway at present, and NH intends to be in a position to update the EiP when it re-opens.</p> <p data-bbox="1377 523 2047 978">The Inspector's requirements are that the proposed improvements are demonstrated to mitigate impacts of the entire Local Plan, and the submitted information has been prepared on this basis. EB133c neither confirms nor discounts the need for an "interim" scheme for J12, although does include Option 1 improvements which have been discounted from further consideration in the EiP on the basis that it does not accommodate full SDC Local Plan growth.</p>
011	South Gloucestershire Council	<p data-bbox="660 1050 1377 1209">South Gloucestershire Council considers that it is now a matter of common ground between both Stroud District Council and South Gloucestershire Council that:</p> <p data-bbox="660 1220 1377 1362">(1) The planned growth in the Draft Stroud District Council Local Plan is not seeking to commit</p>	<p data-bbox="1377 1050 2047 1394">Comments are noted. Based on these comments and meetings held between the parties, SDC considers that a SOCG with SGC that addresses these points and allows SGC to support the Plan is achievable.</p>

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		<p>development in South Gloucestershire Council to help fund the strategic delivery of J14 as set out in reports EB133a and EB133b.</p> <p>(2)</p> <p>That the South Gloucestershire Council emerging Local Plan which is expected to progress to Regulation 19 consultation in early 2025, does not require a new junction solution to be brought forward within the plan period.</p> <p>(3)</p> <p>That therefore Stroud District Council is not requesting that any of the development proposed by South Gloucestershire Council in its emerging Local Plan should contribute to the 15% local contribution for any future junction replacement costs as required by the Stroud District Council Local Plan.</p> <p>(4)</p> <p>That an interim solutions led approach between developer parties and NH (NH) to enable the NH holding objections on the planning applications at Charfield has been agreed and the holding objections were lifted on 20th August. These developments help to meet the housing needs of</p>	

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		<p>South Gloucestershire and ensure the Council can continue to have a 5 year housing land supply.</p> <p>(5)</p> <p>That South Gloucestershire Council Local Plan emerging preferred spatial strategy as set out in the Local Plan Phase 3 consultation: Towards a Preferred Strategy that completed its Regulation consultation in February 2024 has the spatial objective to manage down the need to extend commuting travel distances from more peripheral locations and any dependency on ‘big ticket’ infrastructure items to deliver housing led proposals, which have not advanced in pathway delivery terms, or we feel present significant risks to being able to do so.</p> <p>(6)</p> <p>That should the new junction come forward South Gloucestershire Council would be informed and engaged as necessary to enable it to fully exercise its role as connecting Highway Authority with regard to any impacts on the non-strategic highway network, and in particular on the road(s) over the M5 and proposed works on the B4509 and its junction with the A38.</p>	

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		<p>Accordingly, South Gloucestershire Council would ask that the statement at para 4.2.8 of document EB133B is re-worded to reflect the agreed matters above, and that points 1 to 6 above form the basis of an addendum to the Statement of Common Ground (SoCG) between Stroud District Council and South Gloucestershire Council of 8th March 2023.</p> <p>Subject to the above South Gloucestershire Council raises no further in principle objections to the Stroud District Council Local Plan and considers Stroud District Council have appropriately addressed and resolved the issues raised in representations South Gloucestershire Council made to the Reg 19 Stroud District Council Local Plan.</p> <p>As one of our neighbours, we fully support Stroud District Council efforts to bring forward their own local plan. We would hope that as the Inspectors for the Stroud District Council Local Plan, you will support this objective and can lead the discussion with Stroud District Council to ensure they are able to bring forward a pragmatic plan without further delay. The benefits of doing so would from our perspective clearly outweigh the delay, additional costs, and uncertainty which would be</p>	

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		created should it be concluded that the plan could not be progressed to adoption.	
016	Lucy Biddle	Anyone can write a strategy- this is not evidence to guarantee it WILL happen, only that, in theory, it could, which is neither strong nor sound enough to continue with the Sharpness allocation.	Comment is noted.
017	Brookthorpe with Whaddon Parish Council	My comment is that Document EB133A headed Design and Costings M5 Junctions 12 and 14 Report does not appear to mention J12 with the whole report referring to J14. How can this Consultation proceed without references J12 ?	The design and costing of improvement options for J12 are included at EB133c.
020	Carole Jeffes	Funding is not identified and upgrade is not predicted until 2041	The funding strategy for both M5 J12 and J14 is identified in EB133b. This outlines that 15% of the funding will be from contributions from local development (with a 'worst-case' scenario assuming that all of this would be from SDC Local Plan). For the remaining 85%, SDC is continuing to promote and discuss the

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			<p>junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p>
021	Virginia Jackson	The plan will not overcome the capacity constraints on J12.	Comment is noted. However, the modelling has demonstrated to the satisfaction of SDC, GCC and NH that mitigation at both J12 and J14 will address existing issues, and those which will happen in the absence of the Plan, and the Plan itself.

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		<p>Report EB133c identifies a delivery date for the upgrade as 2041. Secured Government funding is not identified.</p>	<p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p>
		<p>NH (NH) state J12 is near to capacity. Housing development would be post 2041.</p>	<p>Please refer to SDC's wider response above.</p>

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022	Steve Jackson	The plan will not overcome the capacity constraints on J12.	Comment is noted. However, the modelling has demonstrated to the satisfaction of SDC, GCC and NH that mitigation at both J12 and J14 will address existing issues, and those which will happen in the absence of the Plan, and the Plan itself.
		Report EB133c identifies a delivery date for the upgrade as 2041. Secured Government funding is not identified.	The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135. The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and
		NH (NH) state J12 is near to capacity. Housing development would be post 2041.	

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			will be suitable to accommodate planned levels of traffic growth.
024	Susan Leleu	<p>Most of the housing planned in the LP is along A38 and without improvements to this junction then traffic congestion and delay is inevitable.</p> <p>I am concerned that housing will be built prior to any improvement at this junction just to satisfy the meeting of LP targets. This junction may not be completed until 2041 and therefore the scale of proposed housing should not be started until after the junctions have been improved</p>	<p>Improvements to J12 are being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135. These trajectories also consider the potential effect of M5 J12 and J14 becoming a constraint to development. Planning applications will need to provide Transport Assessments which demonstrate their level of impact on the highways network, and GCC and NH will respond appropriately.</p>

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		<p>There will be an enormous amount of money spent just in a small area to improve both junctions 12 and 14 (possibly £316 million) when there are other sites available that would not require this amount of investment by NH. I believe this is disproportionate to the LP building proposals of SDC.</p> <p>That is why I believe that the LP is unsound and undeliverable</p>	<p>EB135 demonstrates how some housing could be delivered through the SDC Local Plan without impacting on J12 (and J14) should there be any delay to the implementation of the junction improvements.</p> <p>SDC has a statutory duty to prepare a Local Plan which allocates housing to deliver housing needs over a 15-year period. The geography of SDC is such that there are very limited housing location options which do not add traffic to either J12 or J14. The modelling shows that improvement schemes would be needed in these locations due to background growth as well as development, and there is limited headroom for development to occur without the need for investment. A level of housing growth which would utilise J13 instead is already provided within the Plan. Whilst not the subject of the Local Plan analysis, there would be a point above which the level of housing in this location would result in a need for capacity improvement in this location. It is unlikely that SDC could meet its statutory duty to proactively plan for growth</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			over a 15-year period without also requiring significant investment in motorway assets.
025	Jeremy Akers	Junction not capable of taking increased traffic generated by development proposed by local Plan. As improvements not expected until 2041 any major development must be considered outside the scope of this Local Plan	<p>The results of microsimulation modelling, as outlined in EB133c, confirm that the improvements for J12 will fully accommodate traffic growth associated with the SDC Local Plan.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p>
026	Graham Ellis	M5 J12 is clearly at capacity now. Therefore any additional strain on this junction should not be permitted until there is a clear, defined and	Improvements to J12 is being promoted for this reason. The scheme will ensure suitable future operation accounting for both

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>funded way forwards. The potential upgrades can only be considered an aspiration at the moment, as much further detail design work and environmental studies will be required to be in a position to properly cost this.</p>	<p>background and planned growth in traffic. SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5th February 2024 and is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p> <p>The level of detail provided on scheme costs is proportionate to the current planning stage. The costs have been benchmarked against comparable motorway improvement schemes and include significant values for contingency and optimism bias to account for the various unknowns which would be present for the design of any motorway improvement scheme at this stage. Discussions with stakeholders have included ensuring that there are allowances to cover the full range of costs that would apply. NH has advised that it considers the Order of Cost Estimate to be within the range that it would expect.</p>
		<p>As there has been no agreement on funding this upgrade, and it is unlikely to be available before 2041, It should not be assumed as being 'available' for the purposes of the local plan.</p>	<p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		In conclusion, the proposed works to M5 J12 do NOT resolve the junction capacity constraints.	<p>discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p>
027	Sian Hill	The proposed works to M5 Junction 12 are not effective for several reasons: firstly, government funding for this work is not guaranteed; secondly, the completion date (if approved) is 2041. Also, NH have stated that they will not grant permission for additional housing because the junction is at	The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>capacity so house building will be delayed until at least 2041.</p>	<p>government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p>
		<p>Finally, it does not consider some new developments adjacent to M5 junction12 that are outside Stroud District Council area but will still affect the capacity at Junction 12.</p>	<p>Cross-boundary impacts and growth from within the SLP area (Gloucester, Cheltenham, Tewkesbury) have been assessed appropriately and robustly using the traffic flow outputs from strategic modelling. Further information on the strategic modelling is available in EB61 and EB98.</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
029	Sarah Bowles	<p>No, the proposed plan will not overcome the capacity constraints to Local Plan (LP) growth. There is no secured government funding in place – so we have to assume that these works will not be scheduled until 2041.</p> <p>For all of the reasons set out above and, despite spending considerable amounts of money trying to prove otherwise, the Local Plan is neither deliverable nor sound.</p>	<p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p> <p>SDC has a statutory duty to prepare a Local Plan which allocates housing to deliver housing needs over a 15-year period. The geography of SDC is such that there are very</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			<p>limited housing location options which do not add traffic to either J12 or J14. The modelling shows that improvement schemes would be needed in these locations due to background growth as well as development, and there is limited headroom for development to occur without the need for investment. A level of housing growth which would utilise J13 instead is already provided within the Plan. Whilst not the subject of the Local Plan analysis, there would be a point above which the level of housing in this location would result in a need for capacity improvement in this location. It is unlikely that SDC could meet its statutory duty to proactively plan for growth over a 15-year period without also requiring significant investment in motorway assets.</p>
		<p>Total budget for improvements to J12 and J14 (including inflation and risk) is around £375m, added to other major schemes such as M5 J9 for Tewkesbury – these sums cannot be met by local ratepayers and definitely not at the cost of all other local authority services.</p>	<p>The funding strategy for both M5 J12 and J14 is identified in EB133b. This outlines that 15% of the funding will be from contributions from local development (with a ‘worst-case’ scenario assuming that all of this would be from SDC Local Plan). The viability testing of this level of contribution will be addressed through the future stages of the EiP. Remaining funding would be from a bid to Central</p>

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			Government, and would not be at the expense of local ratepayers or other local authority services.
		Modelling work, on which this Plan is based, appears to be at best, patchy and at worst, selective and misleading. Proper regional transport modelling, taking into account the plans of Gloucester, Tewkesbury, Stroud and South Gloucestershire must be carried out before any realistic assessments of infrastructure needs can be made. There appear to be no prospects of this cooperation / leadership by our local authorities.	Cross-boundary impacts and growth from within the SLP area (Gloucester, Cheltenham, Tewkesbury) have been assessed appropriately within this modelling using the traffic flow outputs from regional strategic modelling. This has been based on DfT guidance and has been scrutinised and accepted by GCC and NH. Further information on the strategic modelling is available in EB61 and EB98. The scheme design, costing and assessment has been undertaken in consultation with GCC. The results of microsimulation modelling, as outlined in EB133c, confirm that the improvements for J12 will fully accommodate traffic growth associated with the SDC Local Plan.
		According to their programme, the promoters of Wisloe intend starting work in 2026/7, by which time none of these improvements will have been implemented.	The programme for Wisloe remains subject to confirmation and receipt of planning permission. NHs may seek to offer a holding objection to any development at Wisloe until

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			the J12 improvements have been implemented.
031	John Humphries	Doubtful, too little too late.	Comment is noted.
032	David Thombs	<p>The proposed plan will not overcome the capacity constraints to Local Plan (LP) growth. The LP is therefore not deliverable and is unsound</p> <p>NH state that J12 is already at capacity. and there is no RIS3 (2025-2030) or NSIP funding for J12, or plans to develop J12. The delivery in 2041 for J12 seems realistic. Therefore, the LP which schedules strategic housing deliveries in areas which increase load significantly to J12, beyond the trigger point level, should not be included within the LP until after the J12 development is completed.</p>	<p>Comment is noted. However, the modelling has demonstrated to the satisfaction of SDC, GCC and NH that mitigation at J12 will address existing issues, and those which will happen in the absence of the Plan, and the Plan itself.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p> <p>The improvements will be completed before 2041. EB134 and EB135 includes housing</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			trajectories for a range of scenarios including with and without the delivery of improvements to J12. Each site will need to go through the planning application process and provide a Transport Assessment. GCC and NH will be statutory consultees to that process and will make recommendations on the acceptability of each application accordingly.
		The cost estimates in EB133c are optimistic when compared with other similar size and scope project and there is a lack of consistency between the costing approaches for J12 compared with J14.	The level of detail provided on scheme costs is proportionate to the current planning stage. The costs have been benchmarked against comparable motorway improvement schemes and include significant values for contingency and optimism bias to account for the various unknowns which would be present for the design of any motorway improvement scheme at this stage. Discussions with stakeholders have included ensuring that there are allowances to cover the full range of costs that would apply. NH has advised that it considers the Order of Cost Estimate to be within the range that it would expect.

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		The SoCG have not been published.	SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors
033	Suzanne Prosser	No - funding has not been agreed for the schemes and the capacity issues have not been addressed. The inspectors' fundamental concerns around the Strategic Road Network outlined in August 2023 have not been addressed adequately.	SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5 th February 2024 and is confident that a scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
034	Owen Leleu	Most of the housing planned in the LP is along A38 and without improvements to this junction then traffic congestion and delay is inevitable.	Improvements to J12 is being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic.
035	Danielle Ellis	The funding required to improve the junction is not available and is not the government's priority.	The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
036	Jessica Cuthbert-Smith	No, the plan will not overcome the capacity constraints of junction 12, which is near to capacity. The Report gives a delivery date of 2041, there is no government funding identified.	<p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and</p>

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			will be suitable to accommodate planned levels of traffic growth.
037	David Scammell	<p>Report EB133c identifies a delivery date for the upgrade as 2041. Secured Government funding is not identified.</p> <p>In addition to this, NH (NH) state J12 is near to capacity. Housing development would be post 2041.</p>	<p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
038	Vanessa Davies	The proposals don't go far enough to overcome the capacity challenges.	Comment is noted. However, the modelling has demonstrated to the satisfaction of SDC, GCC and NH that mitigation at J12 will address existing issues, and those which will happen in the absence of the Plan, and the Plan itself.
039	Philip Butcher	No. The plan will not overcome the capacity constraints on Junction 12. The report EB133c has identified a delivery date for the upgrade as 2041 but no Government funding has been secured. NH have stated that Junction 12 is near to capacity so any housing development would have to be after 2041.	<p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
042	Andrew Davis	No, the proposed plan will not overcome the capacity constraints to Local Plan (LP) growth.	Comment is noted. However, the modelling has demonstrated to the satisfaction of SDC, GCC and NH that mitigation at J12 will address existing issues, and those which will happen in the absence of the Plan, and the Plan itself.
043	Kirk Walton	I question SDC, NH or Gloucestershire Highways can deliver Junction 12 funding, planning and construction in a timely manner that would match housing delivery schedules.	The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
044	Helen Bamber	<p>The plan will not overcome the capacity constraints on J12.</p> <p>Report EB133c identifies a delivery date for the upgrade as 2041. Secured Government funding is not identified.</p> <p>NH (NH) state J12 is near to capacity. Housing development would be post 2041.</p>	<p>The modelling has demonstrated to the satisfaction of SDC, GCC and NH that mitigation at both J12 and J14 will address existing issues, and those which will happen in the absence of the Plan, and the Plan itself.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			will be suitable to accommodate planned levels of traffic growth.
046	Andrew Davis	No, the proposed plan will not overcome the capacity constraints to Local Plan (LP) growth. Report EB133c identifies a potential future delivery date as 2041 but provides no supporting evidence to justify why this date was identified?	The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.
		NH stated J12 is already near to capacity, but no trigger point has been identified after which no further development would be permitted. NH confirmed there is no RIS3 (2025-2030) or NSIP funding for J12, or plans to develop J12, so the assumed delivery in 2041 for J12 seems realistic. Therefore, the LP which schedules strategic housing deliveries in areas which increase load significantly to J12, beyond the trigger point level, should not be included within the LP until after the	The timescale of delivery of the M5 J12 and scheme only affects the delivery of some of the houses within the Local Plan. A worst-case scenario assessment of assuming that no housing which adds traffic to J12 can come forwards has been applied to the Housing Trajectory, presented in EB134. This shows the level of housing which can come forwards without reliance on these schemes. As has been discussed extensively in the EiP, SDC

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>J12 development is completed, which could be 2041. It is likely therefore that traffic load will be restricted until circa 2041, which will constrain the LP growth significantly until it is completed. As it stands, the LP is therefore not deliverable and is unsound.</p>	<p>understands NH’s position that no new traffic can be added to J14 without mitigation. It is also accepted between SDC, GCC and NH that, based on modelling commissioned by GCC, an improvement scheme will be needed at J12 early in the Plan period. NH wishes to understand the trigger points in more detail, and therefore has committed to undertaking additional trigger point modelling. This is underway at present, and NH intends to be in a position to update the EiP when it re-opens</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p>
		<p>Analysis indicates the absolute cost estimates in EB133c are optimistic when compared with other similar size and scope projects. However, there is a lack of consistency between the costing</p>	<p>The level of detail provided on scheme costs is proportionate to the current planning stage. The costs have been benchmarked against comparable motorway improvement</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>approaches for J12 compared with J14 (risk, inflation, optimism bias etc). Standardising the different approaches to a common form makes the J12 cost relatively more competitive compared with J14.</p>	<p>schemes, so it is unclear which analysis indicates that the costs are optimistic. The costs include significant values for contingency and optimism bias to account for the various unknowns which would be present for the design of any motorway improvement scheme at this stage. Discussions with stakeholders have included ensuring that there are allowances to cover the full range of costs that would apply. NH has advised that it considers the Order of Cost Estimate to be within the range that it would expect. The costing approach for J12 and J14 are consistent, although some alternative assumptions to account for contingency, bias, land etc. have been made owing to the differences in scheme design.</p>
		<p>The complimentary SoCG have not been published to-date, suggesting the report contents have not been agreed by NH or GCC.</p>	<p>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors.</p>
047	Stagecoach West	<p>The WSP report allows for inflation but it is not clear what assumptions have been made as to when the work can take place. With doubts about</p>	<p>Inflation has been assumed for 2041 to reflect the latest possible year of scheme delivery in order to provide a robust cost estimate. It is</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>funding and deliverability there is uncertainty as to how the inflation figure can be estimated and therefore the total cost could be considerably higher.</p>	<p>expected that the scheme would be delivered prior to 2041, as confirmed in EB133b. It is important to note that viability testing assumes present cost values, as it also assumes present revenue values for housing. Similarly, bids for central government funding would be based on costs at the time of the bid. Therefore the level of inflation in the WSP report is not relevant to deliverability considerations for the scheme.</p>
		<p>There are major issues about funding. Even though a 15% contribution may be secured, Central Government will have to provide the bulk of the financing and there are other planned junction upgrades on the M5. Tewkesbury Borough Council has estimated J 9A and the A46 at between £730 million and £940 million and the cost of J 10 is in excess of £200 million. There is no certainty that the J12 proposed works will be completed within the Plan period. It is common practice (as in the Winneycroft site in Gloucester) for developers to obtain reductions in their contributions on viability grounds and the revised NPPF prioritises education and affordable</p>	<p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p> <p>SDC is confident that a suitable funding mechanism will be available (e.g. S106, CIL) to generate the necessary level of developer contribution for the improvement schemes.</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		housing contributions. SDC may have to replace that funding.	
		In their letters to SDC the Inspectors have stressed the need for SDC to show that in order to prove the Plan is sound the M5 upgrades must be funded and deliverable in the Plan period. The length of that period is now shorter with the delays in the EiP and there are no commitments which will ensure funding and deliverability will be secured.	Please refer to comments above. SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5 th February 2024 and is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
051	Scott Temlett	There will still be underlying issues with the amount of traffic using J12. The plan does nothing to alleviate this.	Improvements to J12 are being promoted to address traffic issues. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The results of microsimulation modelling, as outlined in EB133c, confirm that the proposed improvements for J12 will fully accommodate traffic growth associated with the SDC Local Plan in addition to background growth in traffic.
		There is currently no funding from Central Government.	The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
		The current report states a delivery date for any junction improvements will not be until 2041.	The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.
		Nation Highways state J12 is almost at maximum capacity with the amount of housing in the local area already built.	Please refer to comments above.
		Apparently, the housing development in Whaddon which is around 3,000 houses is not including with any junction improvements on J12.	SDC confirm that Land at Whaddon (ref. G2) has been included in the assessment of the scheme proposals.

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		The above statements means the plan is totally unachievable.	Comment is noted.
052	Alex Hunter	It is my feeling that the development of Whaddon has not been included in the modelling - this will negatively impact on the capacity of the junction Highways indicates that the J12 is at 'near capacity'	SDC confirm that Land at Whaddon (ref. G2) has been included in the assessment of the scheme proposals. The results of microsimulation modelling, as outlined in EB133c, confirm that the improvements for J12 will fully accommodate traffic growth associated with the SDC Local Plan.
054	Stephen Willetts	<p>No, capacity constraints to Local Plan growth are not overcome.</p> <p>Report EB133c identifies a potential future delivery date as 2041. This is realistic given NH have stated J12 is already near capacity and that no RIS3 (2025-2030) or NSIP funding is identified nor plans to develop J12 indicated.</p>	<p>The results of microsimulation modelling, as outlined in EB133c, confirm that the improvements for J12 will fully accommodate traffic growth associated with the SDC Local Plan.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>Strategic housing deliveries in areas increasing load significantly to J12 should not be included within the LP until after the J12 development is completed which could be 2041. No trigger point has been identified after which further development should not be permitted. This adds further uncertainty, reinforcing that traffic load will be restricted until circa 2041. This constrains the LP growth significantly until it is completed. Further, there is no statement of common ground to indicate agreement or concerns with the report.</p>	<p>enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p> <p>The timescale of delivery of the M5 J12 and J14 schemes only affects the delivery of some of the houses within the Local Plan. A worst-case scenario assessment of assuming that no housing which adds traffic to either J12 or J14 can come forwards has been applied to the Housing Trajectory, presented in EB134. This shows the level of housing which can come forwards without reliance on these schemes. As has been discussed extensively in the EiP, SDC understands NH's position that no new</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			<p>traffic can be added to J14 without mitigation. It is also accepted between SDC, GCC and NH that, based on modelling commissioned by GCC, an improvement scheme will be needed at J12 early in the Plan period. NH wishes to understand the trigger points in more detail, and therefore has committed to undertaking additional trigger point modelling. This is underway at present, and NH intends to be in a position to update the EiP when it re-opens.</p> <p>Planning applications will need to provide Transport Assessments which demonstrate their level of impact on the highways network, and GCC and NH will respond appropriately.</p> <p>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors.</p>
		<p>Development G2 Whaddon of some 3000 houses has not been included in J12 modelling. These numbers though not relevant to SDC housing needs must be considered in the modelling as this allocation is adjacent and will clearly impact the junction.</p>	<p>SDC confirm that Land at Whaddon (ref. G2) has been included in the assessment of the scheme proposals.</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>The costing approaches for J12 and J14 are not consistent with respect to risk, inflation, optimism bias. Analysis indicates the absolute cost estimates in EB133c are optimistic when compared with other similar size and scope projects.</p>	<p>The level of detail provided on scheme costs is proportionate to the current planning stage. The costs have been benchmarked against comparable motorway improvement schemes and include significant values for contingency and optimism bias to account for the various unknowns which would be present for the design of any motorway improvement scheme at this stage. Discussions with stakeholders have included ensuring that there are allowances to cover the full range of costs that would apply. NH has advised that it considers the Order of Cost Estimate to be within the range that it would expect. The costing approach for J12 and J14 are consistent, although some alternative assumptions to account for contingency, bias, land etc. have been made owing to the differences in scheme design.</p>
		<p>The LP is therefore not deliverable and remains unsound for the most fundamental of reasons; no clear funding and delivery likely much later than needed.</p>	
055	Slimbridge Parish Council	<p>No, the proposed plan will not overcome the capacity constraints to Local Plan (LP) growth. Report EB133c identifies a potential future delivery date as 2041 but provides no supporting evidence to justify why this date was identified?</p>	<p>The results of microsimulation modelling, as outlined in EB133c, confirm that the improvements for J12 will fully accommodate</p>

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		<p>NH stated J12 is already near to capacity, but no trigger point has been identified after which no further development would be permitted. NH confirmed there is no RIS3 (2025-2030) or NSIP funding for J12, or plans to develop J12, so the assumed delivery in 2041 for J12 seems realistic. Therefore, the LP which schedules strategic housing deliveries in areas which increase load significantly to J12, beyond the trigger point level, should not be included within the LP until after the J12 development is completed, which could be 2041. It is likely therefore that traffic load will be restricted until circa 2041, which will constrain the LP growth significantly until it is completed. As it stands, the LP is therefore not deliverable and is unsound.</p>	<p>traffic growth associated with the SDC Local Plan.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p> <p>As has been discussed extensively in the EiP, SDC understands NH's position that no new traffic can be added to J14 without mitigation. It is also accepted between SDC, GCC and NH that, based on modelling commissioned by GCC, an improvement scheme will be needed at J12 early in the Plan period. NH wishes to understand the trigger points in more detail, and therefore has committed to undertaking additional trigger point modelling. This is underway at present, and NH intends to be in a position to update the EiP when it re-opens.</p>

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			<p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p>
		<p>Analysis indicates the absolute cost estimates in EB133c are optimistic when compared with other similar size and scope projects. However, there is a lack of consistency between the costing approaches for J12 compared with J14 (risk, inflation, optimism bias etc). Standardising the different approaches to a common form makes the J12 cost relatively more competitive compared with J14.</p>	<p>The level of detail provided on scheme costs is proportionate to the current planning stage. The costs have been benchmarked against comparable motorway improvement schemes and include significant values for contingency and optimism bias to account for the various unknowns which would be present for the design of any motorway improvement scheme at this stage. Discussions with stakeholders have included ensuring that there are allowances to cover the full range of costs that would apply. NH has advised that it considers the Order of Cost Estimate to be within the range that it would expect. The costing approach for J12 and J14 are consistent, although some alternative assumptions to</p>

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		<p data-bbox="674 491 1368 639">The complimentary SoCG have not been published to-date, suggesting the report contents have not been agreed by NH or GCC The Plan is not deliverable and is unsound.</p>	<p data-bbox="1391 344 2033 451">account for contingency, bias, land etc. have been made owing to the differences in scheme design.</p> <p data-bbox="1391 491 2033 598">SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors.</p>
056	Cllr Lindsey Green Stroud District Council	<p data-bbox="674 738 1368 1361">No, the proposed plan will not overcome the capacity constraints to Local Plan (LP) growth. Report EB133c identifies a potential future delivery date as 2041 but provides no supporting evidence to justify why this date was identified? NH stated J12 is already near to capacity, but no trigger point has been identified after which no further development would be permitted. NH confirmed there is no RIS3 (2025-2030) or NSIP funding for J12, or plans to develop J12, so the assumed delivery in 2041 for J12 seems realistic. Therefore, the LP which schedules strategic housing deliveries in areas which increase load significantly to J12, beyond the trigger point level, should not be included within the LP until after the J12 development is completed, which could be</p>	<p data-bbox="1391 738 2033 930">The results of microsimulation modelling, as outlined in EB133c, confirm that the improvements for J12 will fully accommodate traffic growth associated with the SDC Local Plan.</p> <p data-bbox="1391 962 2033 1305">The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth</p>

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		<p>2041. It is likely therefore that traffic load will be restricted until circa 2041, which will constrain the LP growth significantly until it is completed. As it stands, the LP is therefore not deliverable and is unsound.</p>	<p>trajectories, as outlined in as outlined in EB134 and EB135.</p> <p>As has been discussed extensively in the EiP, SDC understands NH's position that no new traffic can be added to J14 without mitigation. It is also accepted between SDC, GCC and NH that, based on modelling commissioned by GCC, an improvement scheme will be needed at J12 early in the Plan period. NH wishes to understand the trigger points in more detail, and therefore has committed to undertaking additional trigger point modelling. This is underway at present, and NH intends to be in a position to update the EiP when it re-opens.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p>

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		<p>Analysis indicates the absolute cost estimates in EB133c are optimistic when compared with other similar size and scope projects. However, there is a lack of consistency between the costing approaches for J12 compared with J14 (risk, inflation, optimism bias etc). Standardising the different approaches to a common form makes the J12 cost relatively more competitive compared with J14.</p>	<p>The level of detail provided on scheme costs is proportionate to the current planning stage. The costs have been benchmarked against comparable motorway improvement schemes and include significant values for contingency and optimism bias to account for the various unknowns which would be present for the design of any motorway improvement scheme at this stage. Discussions with stakeholders have included ensuring that there are allowances to cover the full range of costs that would apply. NH has advised that it considers the Order of Cost Estimate to be within the range that it would expect. The costing approach for J12 and J14 are consistent, although some alternative assumptions to account for contingency, bias, land etc. have been made owing to the differences in scheme design.</p>
		<p>The complimentary SoCG have not been published to-date, suggesting the report contents have not been agreed by NH or GCC. The Plan is not deliverable and is unsound.</p>	<p>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors.</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
057	John Mace	I like the preferred option for Junction 14 as the only viable one to ease traffic congestion.	<p>Comments relate to J14.</p> <p>The improvement scheme for J14 has been designed specifically for the location and context of that junction, and would not be entirely appropriate for J12 – although please note that Option 3a as outlined in EB133c is an improvement of the same scale as outlined for J14.</p>
		Figure 2.7 does little to address large increases of traffic.	<p>Comment relates to J14.</p> <p>The improvements shown to the A38 / B4009 are demonstrated to be suitable to accommodate forecast traffic levels via microsimulation modelling, as outlined in EB133a.</p>
		Costs seem very optimistic and 3.3.2. very much so.	<p>Comment relates to J14.</p> <p>The level of detail provided on scheme costs is proportionate to the current planning stage. The costs have been benchmarked against comparable motorway improvement schemes and include significant values for contingency and optimism bias to account for the various unknowns which would be present for the design of any motorway improvement scheme</p>

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			at this stage. Discussions with stakeholders have included ensuring that there are allowances to cover the full range of costs that would apply. NH has advised that it considers the Order of Cost Estimate to be within the range that it would expect.
058	Carl Merry	<p>NH have said that Jn 12 is near to capacity.</p> <p>EB133c identifies a delivery date as 2041. Secured government funding is not evident.</p>	<p>Comment is noted.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst</p>

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			all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
059	Haydn Jones	An apparently arbitrary date of 2041 is used for resolving existing recognised capacity limits at M5J12. With this in mind, this will constrain proposed local plan growth.	The junction improvements are expected to be completed before 2041. This year has been chosen for capacity modelling to reflect the end of the SDC Local Plan period as is standard assessment practice. Delivery of the improvement is expected to be significantly before this point.
		The cost estimates used for M5J12 are not calculated using the Government standard. If these are corrected from using 2041 costs to current costs as per Government recommendation, there appears to be greater value and ability to remove constraint than development at M5J14.	The report also presents scheme costs at present value, i.e. without inflation. It is important to note that viability testing assumes present cost values, as it also assumes present revenue values for housing. Similarly, bids for central government funding would be based on costs at the time of the bid. Therefore the level of inflation in the WSP report is not relevant to deliverability considerations for the scheme.

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060	Savills on behalf of Catesby Estates	We have no comments on the proposed improvement works to J12 or the associated costs.	Comment is noted.
061	Denis Bannister	The proposed works are not effective and will not overcome forecast capacity generated by the local plan.	Comment is noted.
063	Shelagh Daley	I do not think that SDC have given sufficient clarity to either the timescale or cost of the improvements to junction 12. Any development prior to 2041 will be detrimental to the whole area and cause even more motorway gridlock around this junction. We already have the situation where the A38 becomes gridlocked when either or both Junction 12 north bound and south bound are closed. There is also a dangerous situation at peak times with queuing traffic using both the hard shoulder and lane 1 both north and south bound.	Improvements to J12 is being promoted owing to the existing constraints on the local network. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5 th February 2024 and is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.

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064	Jo Kendall	The plan is clearly unsound and the technical reports do not sufficiently answer the inspectors question from February 2024.	SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5 th February 2024 and is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
067	Sally Allen	This junction is already overwhelmed at peak times, the recent additional housing in Kingsway and Hunts Grove already struggle daily and with any additional accidents the volume of traffic totally overwhelms the area and leads to gridlock. Poor and unrealistic planning and determining of road usage has left this whole stretch of the M5 wholly unworkable.	Improvements to J12 is being promoted owing to the existing constraints on the local network. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. SDC is seeking to promote plan-led development with strategic planning for infrastructure over the plan period.
068	Woods Hardwick Planning Ltd on behalf of	TSGI supports in principle the objective of a co-ordinated approach to explore the options and opportunities for securing funding for the upgrades required to J12 of the M5. It is essential that solutions are found if the housing and	Comment is noted.

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	Tritax Symmetry Gloucester Ltd	economic needs of Stroud and the wider region are to be met, which should be beyond the Plan period.	
070	Gillian Delve	<p>No! As I thought the Local Plan (LP) was to take us up to 2040 the fact that report EB133c says a likely completion date for the changes to J12 would be 2041 makes the LP undeliverable.</p> <p>It seems there is no Government funding in place at this time. With NH saying this junction is at near capacity now, any developments which impact on this should not be included in the LP until alterations to J12 are in place.</p>	<p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p> <p>The timescale of delivery of the M5 J12 and J14 schemes only affects the delivery of some of the houses within the Local Plan. A worst-case scenario assessment of assuming that no housing which adds traffic to either J12 or J14 can come forwards has been applied to the Housing Trajectory, presented in EB134. This shows the level of housing which can come forwards without reliance on these schemes.</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			As has been discussed extensively in the EiP, SDC understands NH's position that no new traffic can be added to J14 without mitigation. It is also accepted between SDC, GCC and NH that, based on modelling commissioned by GCC, an improvement scheme will be needed at J12 early in the Plan period.
071	Darius Ferrigno	<p>The plan will not overcome the capacity constraints on J12. Report EB133c identifies a delivery date for the upgrade as 2041. Secured Government funding is not identified.</p> <p>NH (NH) state J12 is near to capacity. Housing development would be post 2041.</p>	<p>The results of microsimulation modelling, as outlined in EB133c, confirm that the improvements for J12 will fully accommodate traffic growth associated with the SDC Local Plan.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p>

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			The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
072	Black Box Planning on behalf of Taylor Wimpey Strategic Land	<p>The G2 Land at Whaddon draft allocation has a minor impact on M5 Junction 12, with +83 overall vehicle movements through the junction in the AM peak hour, and +100 overall movements in the PM peak hour. This is equivalent to a 2% increase in both the AM and PM peak hour, which is well within the daily variance of +/- 6%.</p> <p>Looking closely at the recent strategic modelling results undertaken by the promoters of the G2 draft allocation, it is clear it has a negligible impact at M5 Junction 12 and the Cross Keys Roundabout.</p>	SDC confirm that Land at Whaddon (ref. G2) has been included in the assessment of the scheme proposals. No comment is made on the numbers quoted, but it should be noted that the purpose of plan-led development is to identify the cumulative development impact of the plan as a whole, and to plan strategic infrastructure accordingly. Each site will be required to contribute at a level proportionate to its impact.

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		In our opinion Strategic Site Allocation G2 Land at Whaddon is not reliant on these junction works but should be included as a sensitivity. Sites which are not constrained by these improvements should be accelerated and progressed without delay.	
073	Copperfield L&P Limited on behalf of Colethrop Farm Limited	Detail of the modelling is important because our client's land interests are at Hunts Grove Extension (HGE), a current allocation that should be assessed differently to proposed allocations (Circular 01/2022 paragraphs 45, 48 and footnote 21).	The Hunts Grove Extension is an allocation in the SDC Local Plan (ref. PS30) and therefore it is appropriate to include it in the assessment of J12 and for the allocation to be included in the funding considerations for the improvements to J12.
		Paragraph 3.2.5 of e133b states that the Funding & Delivery Plan remains the most mathematically sound way to allocate funding proportions. The F&D Plan identifies a significant contribution from HGE to improvements at M5 J12 (Tables 9 and 10 of F&D Plan). However we have seen no assessment that development at HGE would result in unacceptable impacts at M5 Junction 12.	The F&D plan is not the subject of this consultation. It is not the purpose of strategic modelling for a Local Plan to assess individual allocations in isolation. This is the responsibility of individual site promoters through the planning application process. The Plan as a whole requires a scheme at Junction 12, and each site will be required to contribute at a level proportionate to its impact.
		NH (NH) and Gloucestershire County Council (GCC) were content that transport assessment	Comment is noted.

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>work undertaken in support of development at Javelin Park (Tritax Symmetry Application No S.21/2579/OUT) demonstrated that the development would not have unacceptable impact on M5 J12 (NH response dated 5th January 2023 and GCC response dated 24th January 2024) The Javelin Park/Tritax Symmetry development was not an allocated site and as outlined in Circular 01/2022 footnote 21 the assessment would need to have included all relevant development that is consented or allocated over the entirety of the plan period. Allowance for HGE would therefore have been needed in the transport assessment.</p>	
		<p>In the absence of appropriate modelling, including a scenario including HGE but excluding proposed allocations, that demonstrates that impact from HGE would lead to unacceptable conditions set out in the NPPF, assumptions regarding contributions from HGE to improvements at M5 Junction 12 are not evidence based.</p>	<p>As outlined above, PS30 Hunts Grove Extension has been included in the modelling of the J12 improvement scheme as is appropriate for an allocation in the SDC Local Plan. The modelling, inclusive of the allocation for the Hunts Grove Extension, confirms that there will be a severe cumulative impact at J12 which the SDC Local Plan as a whole is required to address.</p>

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074	Grass Roots Planning on behalf of Redrow Home Ltd	With regards to J12, the report does not explicitly set out which option is to be taken forward, therefore it is currently ineffective in overcoming the junction capacity constraints as it does not provide clear direction forward. Interim options should be explored to allow some development to come forward before the full works are materialised.	<p>The report provides two clear options which could be taken forward as effective solutions. Thus the report demonstrates that a mitigation solution exists that would be effective.</p> <p>The Inspector’s requirements are that the proposed improvements are demonstrated to mitigate impacts of the entire Local Plan, and the submitted information has been prepared on this basis. EB133c neither confirms nor discounts the need for an “interim” scheme for J12, although does include Option 1 improvements which have been discounted from further consideration in the EiP on the basis that it does not accommodate full SDC Local Plan growth. SDC does not oppose the delivery of an interim scheme, but acknowledges that this may be unnecessary given that the “full” improvement to J12 may be required early in the Local Plan period (see also response to previous point re: trigger point modelling). The respondent should note that the interim schemes being considered at J14 are being proposed and progressed by site promoters.</p>

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			SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5 th February 2024 and is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
075	Sarah Jones	The proposed plan to increase capacity on M5 junction 12, which is near capacity according to NH, does not appear to address the issues raised by the Inspectors.	SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5 th February 2024 and is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
077	Sarah Davis Sarah Davis Glass	It is clear that action has not been taken to obtain funding for improvements to junction 12 in a timescale to fit the local plan. As a consequence, if housing development goes ahead as described in the LP there will be significant problems with traffic flow at this junction and in surrounding roads, which will constrain business.	The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government investment. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector. SDC is confident that the scheme is deliverable and

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			will be suitable to accommodate planned levels of traffic growth.
078	Environment Agency	Plans refer to Flood Zone "1", this should be Flood Zone "3". Flood risk and watercourses affect both Junctions 12 and 14. These environmental constraints will need to be carefully considered at the planning application stage	Comment is noted. Further details will be considered at future planning stages.
079	Cam Parish Council	Cam Parish Council stands by the comments previously submitted in relation to the Motorway junctions. There is no evidence contained within the subsequent reports that gives any assurance or confidence to change our opinion. The capacity constraints at J12 remain.	Comment is noted.
		Report EB133c identifies a delivery date for upgrades as 2041. These and any other proposed modifications remain unachievable and unobtainable as there is no approved, adopted or agreed financial plan in place.	The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041. EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that the junction enhancements will be implemented to

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			accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.
081	Avison Young on behalf of The Tortworth Estate	The Tortworth Estate has no comments to make with regards to Junction 12.	Comment is noted.