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30 November 2023

**FAO Victoria Lucas and Yvonne Wright,
Inspectors appointed to examine the Stroud Local Plan Review**

Dear Ms Lucas and Ms Wright,

**Your Ref: ID-012, dated 2 October 2023
Stroud District Local Plan Review Examination: Appendix 2 AC6**

Thank you for your letter dated 2 October 2023 (Your ref. ID-012) requesting National Highways provide a response to several questions in respect of the Stroud District Local Plan Review Examination.

We provided a response to ID-012 dated 17 October 2023 addressing other matters included in your letter and requested of the Inspectors' additional time to review Appendix 2 AC6 "Note on Housing supply which could be delivered before impacts on M5 J12 and J14 would require mitigation", dated 12 May 2023.

We were concerned that Appendix 2 AC6 could be misinterpreted as the content had not been agreed with National Highways prior to submission to the Inspectors. You will be aware that I wrote to you on this matter on 8 June 2023 (EIP document REP-873-002).

National Highways has continued to work collaboratively with Stroud District Council and its consultant (Aecom) throughout the Local Plan process, including written and verbal representations during the regulation 18 and 19 stages and at the Examination in Public (EIP) hearing sessions.

Inspectors' Request 2 October 2023

In item 8 of your letter dated 2 October 2023, you requested that "further information be provided regarding the modelling that has been undertaken to demonstrate that any sites identified would not impact on [M5 Junctions 12 and 14] (including those listed in the appendix 2AC6 note on housing supply)". Your letter continues, "Any modelling would also need to be agreed with relevant partners including National Highways, and as such we would need clarification of this."

SDC Technical Note and additional email

Stroud District Council has subsequently prepared a Technical Note with supporting calculations for the AM peak hour dated 16 October 2023 to clarify the Appendix. The Council provided further information for the PM peak hour in an email on 15 November 2023.

Letter ID-013 to SDC

In your letter ID-013 dated 24 October 2023, addressed to the Chief Executive of Stroud District Council and copied to National Highways, you invited National Highways to provide comments on the Technical Note and requested that this should cover the impacts on the strategic road network and whether any further modelling or technical work needs to be undertaken. The letter said that if it is felt that further work is required, then the reasons for this should be clearly explained.

Comments on Appendix 2 AC6 and supporting technical data

Stroud District Council has prepared a Technical Note and a further email (referred to as the 'Technical Note' in the remainder of this letter) with supporting calculations for the AM and PM peak hours to clarify the Appendix. The following paragraphs detail our response to these documents.

The Technical Note details all sites which the Infrastructure Delivery Plan (IDP) and Transport Funding and Delivery Plan considers would not have a material impact on the Strategic Road Network (SRN). No rationale is provided for the sites included in the Technical Note which would deliver 8,632 houses and an undefined employment component by 2040. The Local Plan's development strategy will distribute at least 12,600 dwellings and 79 hectares of new employment land to meet needs for the next 20 years¹; so 8,632 dwellings total approximately 69% of the overall housing allocations in the draft Local Plan. The Council has termed these 8,632 dwellings as 'non-IDP sites'.

The policies for the allocations providing the non-IDP sites also include provision for employment. The Council has not indicated how this employment development would be managed if only the housing components were to be permitted until the completion of improvements at M5 Junction 12 (J12) or Junction 14 (J14).

We infer that the sites included in the Technical Note (and Appendix 2 AC6) are those that do not individually represent 5% or more of the Local Plan development traffic forecast to use M5 J12 or J14. This is taken from the Transport Funding and Delivery Plan (TF&DP) that states at paragraph 5.19: *"...the level of contribution for each SDLP allocation has been "sifted" at a 5% threshold. Any of the sites identified to provide less than a 5% impact on the Mitigation Package network are not considered suitable to provide funding..."*

Paragraph 1.4 of the Appendix advises that it does not introduce new evidence into the Examination and utilises information from the IDP. However, no traffic modelling had been undertaken at the time to assess the cumulative impact of only the non-IDP site allocations on the SRN to support the statement.

¹ https://www.stroud.gov.uk/info/Pre_sub.pdf. P.23, paragraph 2.3.4.

On 15 November 2023 the Council provided traffic modelling data at M5 J12 and J14 for the AM and PM peak hours. The data shows the difference in link flows in 2040 for scenarios with and without the non-IDP sites.

The Council has confirmed that the traffic modelling provided to support the Appendix is taken from the 2040 traffic models used to support the Local Plan evidence and has not been re-run to assess the proposed level of development set out in Appendix 2 AC6. The traffic network therefore includes the improved, grade separated roundabout layouts at M5 J12 and J14 and include all traffic associated with the proposed Local Plan allocations.

Traffic associated with those sites listed in the TF&DP (the 'IDP sites') are then removed with the balance of SDLP trips assumed to be those that can be delivered without improvements at M5 J12 and J14 (i.e. 'non-IDP sites' representing the 8,632 dwellings detailed in the Appendix).

The traffic case for the 8,632 dwellings is therefore based on a model network that includes improvement at M5 J12 and J14, hence providing extra capacity. We consider that this is not realistic as the route choices in the 2040 models will be influenced by the fully loaded network (i.e. traffic from the full Local Plan build out), and it does not indicate how the balance of non-IDP sites would affect the operation of the existing junction layouts in 2040.

Noting that the quantum of development within Appendix 2 AC6 has not been modelled, National Highways cannot support Stroud District Council's conclusion that this can come forward without severely impacting on M5 J12 and J14 in the absence of detailed modelling to provide evidence to support this conclusion. Therefore, we have not provided a review and summary of the Technical Note.

The Timing of Improvements at M5 J12 and J14 (the 'when' test)

As set out in previous representations, we consider that there is a need to identify the point at which traffic demand at M5 J12 and J14 exceeds capacity resulting in adverse impact on the safe and efficient operation of the SRN within the existing junction arrangements.

This will then determine a quantum of traffic that can be accommodated at the respective junctions before they exceed capacity, from which can be inferred a level of development for the Stroud District Local Plan; any demand beyond that point should not be permitted until additional capacity has been provided at the respective junction.

To this end and following discussions with Stroud District Council, Gloucestershire County Council and South Gloucestershire Council, National Highways has consented to undertake this 'when' testing to indicate the timely delivery of improvements at M5 J12 and J14 to support the Local Plan in step with development. We anticipate that this modelling could be completed early within the agreed Joint Action Plan timetable.

Management of development delivery before improvements at M5 J12 and J14

Although not addressed in the Appendix, by implication it assumes that those sites included in the Local Plan and not listed in the Appendix (that being sites which individually contribute 5% or more of the traffic through M5 J12 or J14) would not be able to progress before improvements have been completed at M5 J12 and/or J14. However, a policy to manage such development was not provided in the draft Local Plan.

National Highways has already received several pre-applications or planning applications for some of these sites impacting the SRN M5 J12 and J14.

In the absence of a Local Plan development management policy to prevent sites coming forward, National Highways would impose Grampian conditions to manage traffic demands from new development at our junctions. Grampians normally lead to impeded delivery and limited funding. This process would not be consistent with Local Plans at Examination or the National Planning Policy Framework (NPPF).

Stroud District Council is aware of our concerns and have agreed that modifications can be made, therefore we will continue to work with the council to address this matter.

Summary

Based on the current submission and without the necessary modelling evidence base, National Highways cannot conclude that the Stroud District Council Local Plan can deliver 8,632 dwellings and respective employment by 2040 with no mitigation at M5 J12 and J14.

However, National Highways has agreed to undertake 'when' testing at M5 12 and J14 to determine a quantum of vehicular traffic that can be accommodated at the respective junctions before they exceed capacity, from which can be inferred a level of development for the Stroud District Local Plan before improvement of these junctions is required.

National Highways is committed to continued collaborative working with Stroud District Council, Gloucestershire County Council and South Gloucestershire Council leading to the adoption of a sound Local Plan.

Yours sincerely



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