

Part B – Please use a separate sheet for each representation

Name or Organisation:

Lichfields (on behalf of CEG and the Charfield Landowners Consortium)

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="X"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Lichfields provides planning advice to CEG and the Charfield Landowners Consortium (our Client) in respect of land to the south/west of Charfield within South Gloucestershire. There are a number of important cross boundary issues relevant to the emerging Stroud Local Plan and the proposed allocations to the south of the district.

Our Client has for some years been promoting the Charfield site through the South Gloucestershire development plan process for residential led, mixed use development. An outline planning application (application ref: P19/2452/O)

remains undetermined and we are in continued discussions with South Gloucestershire Council (SGC) and the M5 Junction 14 Working Group.

Strategic Road Network - M5 Junction 14

Page 10 of the Plan, in the 'Stroud District Today' section, acknowledges that significant growth is occurring along the M5 corridor (focused on Gloucester, Cheltenham and Bristol) which impacts on Stroud District now and in the future. It also states that public transport across the district is limited. The Plan therefore goes on to state that one of the key priorities is *'ensuring new development is located in the right place, supported by the right services and infrastructure to create sustainable development'*.

Section 2.3 of the Plan acknowledges that one of the key challenges to development is the pressure on roads, particularly the key network junctions within the district. Transport modelling has been undertaken which has identified the need for highway improvements at M5 junctions 12, 13 and 14 together with improvements along the A419 and A38 corridors. This section of the Plan acknowledges that neighbouring authorities are considering areas for strategic growth, including at Charfield.

The draft Plan at paragraph 2.3.30 highlights that the strategy for the south of the District (including growth and infill within settlements at Berkeley, Cam, Dursley, Kingswood, Newtown/Sharpness, Wisloe and Wotton-under-Edge) will require improvements to strategic infrastructure, for example M5 Junction 14 alongside other public transport and planned improvements to services within the area. It is therefore critical that the respective policies for allocations in the above settlements deal with future infrastructure requirements and the mechanisms to ensure their future delivery in advance of strategic development.

It is crucial that Stroud District Council and South Gloucestershire Council work together to ensure that the necessary transport infrastructure, including Junction 14 of the M5, is designed, funded and delivered to unlock the development potential of south Stroud and north South Gloucestershire. To achieve this, effective transport modelling must be undertaken as part of the evidence base to support the draft policies. Suitable funding must be identified for the infrastructure and this will need to be viability tested in order to ensure appropriate contributions can be delivered. At present the draft plan fails to adequately address these issues.

Delivery Policy EI12 – Promoting transport choice and accessibility

Delivery policy EI12 states in appropriate circumstances, new developments will be required to contribute towards infrastructure improvement schemes set out within the Stroud Infrastructure Delivery Plan, the Stroud Sustainable Transport Strategy and the Gloucestershire Local Transport Plan.

Infrastructure Delivery Plan (IDP) (Arup June 2021)

The IDP prepared by Arup makes passing reference to Junction 14. We comment below on some of these references for context to our representations. The key references are as follows:

"Although in South Gloucestershire, the transport model has indicated that the new settlement at Sharpness Garden Village may result in capacity issues relating to Junction 14 of the M5 and the B4509 which links the motorway to the A38".

There is no question whether the Sharpness development would result in impacts at Junction 14; it certainly would. The lack of capacity at Junction 14 is well documented and already impacting on projects 'in the system' as confirmed by the latest traffic modelling at the junction undertaken by the developers of sites in Thornbury and Charfield and reviewed by Highways England.

Highway mitigation in the form of a new junction at Junction 14 has been tested as part of the transport model. A scheme to widen the A38 and the approach from the B4509 are also included within the highway mitigation. It is expected that development within the vicinity of the junction would provide financial contributions towards addressing capacity issues in this location".

The highway mitigation referred to relating to works to the A38 and B4509 relate to analysis undertaken as part of recent planning applications within South Gloucestershire and have no relationship with the Sharpness draft allocation. The IDP whilst referring to other sites within 'the vicinity' of J14 contributing makes no specific reference to the proposed allocations within Stroud which will contribute (e.g. Sharpness / Wisloe) and this is fundamental. It is also unclear as to what form of new junction is considered appropriate; the costs to deliver this; and how contributions will be apportioned to the proposed allocations. This is a significant flaw within the IDP and within the proposed policies for the allocations within the south of Stroud.

The IDP concludes that collaborative working will be required with South Gloucestershire, Highways England and other Stakeholders to develop a scheme of mitigation to resolve predicted capacity issues at Junction 14 to support the growth set out in the Local Plan.

The Regulation 19 Plan is a late stage in the process and very limited progress has been made in this regard. The lack of evidence on the junction mitigation scheme and how it will be funded and what will be attributed to the proposed Stroud sites is a serious soundness matter and goes to the heart of the deliverability of the strategic allocations proposed.

The Delivery Strategy at the end of the IDP is extremely brief and provides no clarity or detail. The first 'Delivery Mechanism' states that site allocations will clearly identify infrastructure requirements. This is clearly not the case for Junction 14 of the M5 which is not referenced in the policies proposing strategic development in Sharpness, Cam & Dursley and Wisloe. The IDP and policy basis of the draft plan are clearly not aligned and require key changes in this respect.

Further assessment and clarity on these matters must be carried out to ensure development in Stroud will not prejudice development locations in neighbouring authorities.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy EI12 must reference the significant infrastructure issues and the mitigation required to ensure growth in Stroud is sustainable. We suggest the policy text and explanatory text is updated in order to set out a clear timetable for when the proposed key infrastructure works will be completed to ensure development will come forward in line with these works.

The impact of strategic growth on J14 of the M5 must be fully tested taking into account cumulative growth in neighbouring local authority areas. More detail is also required in relation to the form of the mitigation proposed; the cost of the works; how these major infrastructure improvements will be funded with the level of funding anticipated from the strategic development sites clarified.

The plan should make it clear that no development should come forward until infrastructure has been design and costed for J14 and the works implemented.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to participate in the Examination in Public in order to be able to elaborate further on our position and the matters raised above particularly in relation to Junction 14 of the M5

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date: