

The Planning Strategy Team
Stroud District Council
Ebley Mill
Westward Road
Stroud GL5 4UB

██████████
Highways England
Brunel House
930 Aztec West
Bristol
BS32 4SR

Via email: local.plan@stroud.gov.uk

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Dear Planning Strategy Team,

STROUD DISTRICT LOCAL PLAN REVIEW: ADDITIONAL HOUSING OPTIONS CONSULTATION, OCTOBER 2020

Highways England welcomes the opportunity to comment on the Stroud District Local Plan Review: Additional Housing Options consultation. As you will be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises the junctions of M5 J12, J13. In addition, though being in neighbouring Districts, M5 J11A (Tewkesbury), M5 J14 (South Gloucestershire), the A417(T) (Tewksbury) and the A40(T) (Gloucester), are SRN junctions and routes also affected by development positioned in Stroud District. It is on the basis of these responsibilities that Highways England has provided the comments that follow in this letter.

Please note that the Highways England policy context was set out in our previous response to the Draft Stroud Local Plan consultation and should be referred to.

Additional Housing Options Consultation

The current Stroud District Local Plan, adopted in 2015, sets out the land use planning strategy in the District up until 2031. The Plan Review will extend this horizon year to 2040.

The Draft Plan, which Highways England commented on in our letter dated 16th January 2020, identifies a minimum residual housing requirement of 7,993 new homes in the District up to 2040, with the need to provide for a minimum of 638 new homes per year. This represents an increase of 40% on the figure in the current SDLP (456 homes per year). The Draft Plan also outlines the need to plan for between 2,300 and 6,300 net new jobs between 2020 and 2040.

The Additional Housing Options consultation identifies potential additional housing sites which may be required should the government's proposed changes to the way minimum housing number requirements for each local authority are calculated be confirmed. This would mean a revised Stroud Draft Local Plan would have to identify land for an additional 1,050-2,400 homes up to 2040.

Furthermore, the additional housing sites may also be required should the Council decide to remove or reduce the numbers of any of the current proposed site allocations set out in the current Draft Local Plan.

The Additional Housing Options paper identifies sites in Berkeley, Stroud, Hardwicke and Whitminster. The majority of the additional housing has been concentrated in two potential growth points:

- Moreton Valence/Hardwicke broad location HAR006-HAR009 and HAR015-HAR016 – potential for up to 1,500 dwellings, employment land, local centre, primary school, community facilities and open space.
- Whitminster WHI014 Land at Grove End Farm - potential for up to 2,250 dwellings, 13 hectares employment, local centre, primary school, community facilities and open space.

Both growth points are in the immediate proximity of SRN junctions, with Moreton Valence/Hardwicke adjacent to M5 Junction 12 and Grove End Farm adjacent to M5 Junction 13. Given the location of the growth points between M5 Junction 12 and 13, both sites would impact on both junctions.

In our previous response of 16th January 2020 we highlighted that the SRN junctions in the District and surrounding areas are typically constrained at peak times. We highlighted our expectation that the Stroud Local Plan Review would be underpinned by a robust transport evidence base and that the transport assessment would carry out a detailed assessment of M5 J12, J13 and J14. This expectation is based on the proximity of proposed allocations and hence the high probability that junctions will come under more pressure in the future due to the growth identified in the Draft Local Plan.

We anticipate that the quantum of development at the sites identified in the Additional Housing Options paper could potentially increase the pressures on the SRN junctions yet further, both in the immediate vicinity of the new potential sites and also potentially other junctions further away, such as M5 J14 in the case of the Grove End Farm site.

We would therefore highlight the importance of considering any additional housing sites which may be included in the Local Plan Review in the same manner as the Draft Stroud Plan potential sites. That is, the additional sites should be subject to the same level of assessment as, and in combination with, the sites identified in the Draft Stroud Local Plan. This is in order to ensure that the transport strategy for the Local Plan fully assesses the impact of the proposals on the SRN and identifies appropriate mitigation required to deliver the Plan.

We have had regular engagement with SDC during the course of the Draft Local Plan's development regarding the SRN's performance and we look forward to continuing this engagement as the Plan develops, with the above points in mind.

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

Yours sincerely,

[Redacted signature]

[Redacted contact information]