

## **M5 Junction 14 Consultation Summaries**

### **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 14 effective and do they overcome the junction capacity constraints to local plan growth?***

<b>Rep Number</b>	<b>Stakeholder Name Organisation OBO</b>	<b>Comments</b>	<b>SDC Response</b>
008 Email	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 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	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 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

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		coming forward, but it would be extremely unlikely for both, unless there was a fundamental change in government's approach to road investment.	promote the improvements to the motorway junctions.
		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.	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.
		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.	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.
009 Email	Pegasus on behalf of Robert Hitchins Ltd	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	Comment is noted.

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		that proposed site allocations can be completed, have not been answered.	
		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. The only conclusion is that the Plan as currently proposed cannot be found sound.	<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, 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</p>

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			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.
012	Mark Sweeting	Options outlined would appear to overcome current capacity issues.	Comment is noted.
013	Nik Handford	Is the funding for this project?	The strategic case as to how the improvements for J14 will be funded is outlined in EB133b. This 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

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		J14 is at capacity now, National Highways have said this.	<p>scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p> <p>Improvements to J14 are being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The design, modelling and cost of the J14 improvement have been developed in consultation with NH, SDC acknowledges NH's position that the improvements will be required early in the Local Plan period.</p>
014	Jim Ford Avon Sports and Classics Car Club (ASACCC)	Is the funding for this project?	The strategic case as to how the improvements for J14 will be funded is outlined in EB133b. This 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.

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018	Historic England	The M5 Junction 14 Improvement Scheme Consultation Report (September 2024) includes an environmental assessment (Appendix A). Unfortunately, this appears not to have considered the likely impact on the setting of Heneage Court (Grade II Listed) approximately 250 meters to the north east, of a repositioned northern slip road as indicated by the suggested/preferred junction improvement scheme (Appendix E). We will defer consideration of this matter to Stroud DC.	Comment is noted. Appendix A contains an Environmental Constraints report, and Figure 1 of this report maps environmental constraints, including Grade II listed assets. Further details will be considered at future planning stages as recommended in the Environmental Assessment report (Appendix A of EB133a).
020	Carole Jeffes	Upgrade is not predicted until 2041	The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133a. 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.

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021	Virginia Jackson	<p>The plan will not overcome the capacity constraints on J14. Reports EB133a and EB133b do not identify Government funding, timescales, the likelihood of success or delivery date.</p>	<p>The results of microsimulation modelling, as outlined in EB133a, confirm that the improvements for J14 will fully accommodate traffic growth associated with the SDC 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 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>National Highways (NH) state that J14 is at capacity now and would not permit any further significant level of housing development.</p>	<p>Improvements to J14 are being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The design, modelling and cost of the J14 improvement have been developed in consultation with NH, and SDC acknowledge</p>



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		Delivery is unlikely until 2041. Housing development would be post 2041.	<p>that the improvements will be required early in the Local Plan period.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133a. 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>
022	Steve Jackson	The plan will not overcome the capacity constraints on J14. Reports EB133a and EB133b do not identify Government funding, timescales, the likelihood of success or delivery date.	<p>The results of microsimulation modelling, as outlined in EB133a, confirm that the improvements for J14 will fully accommodate traffic growth associated with the SDC 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 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.
		National Highways (NH) state that J14 is at capacity now and would not permit any further significant level of housing development.	Improvements to J14 are being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The design, modelling and cost of the J14 improvement have been developed in consultation with NH, and SDC acknowledge that the improvements will be required early in the Local Plan period.
		Delivery is unlikely until 2041. Housing development would be post 2041.	The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133a. 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

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			trajectories, as outlined in as outlined in EB134 and EB135.
024	Susan Leleu	<p>National Highways state that this junction is already up to capacity and state that they would not allow any further large scale development that will further impact on this junction</p> <p>There is no mention in reports EB133a or 133b of secured funding, timescales or delivery dates. If As there are no timescales or delivery dates then it is likely that improvements at this junction may also not take place until 2041. This will constrain the the LP housing growth significantly until the works are completed in 2041.</p>	<p>Improvements to J14 are being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The design, modelling and cost of the J14 improvement have been developed in consultation with NH, and SDC acknowledge that the improvements will be required early in the Local Plan period.</p> <p>The strategic case for funding is outlined in EB133b. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including National Highways, 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 EB133a. The improvements will be completed before 2041. EB133b (para. 2.2.3) confirms</p>

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			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.
		I believe the the works to this junction will not be effective and overcome the capacity constraints for the reasons given above and therefore I believe the LP is not deliverable or sound.	Comment is noted.
		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.	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

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			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.
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>Improvements to J14 are being promoted for this reason. The proposed improvement scheme will ensure suitable future operation of the junction accounting for both background and planned growth in traffic. The results of microsimulation modelling, as outlined in EB133a, confirm that the improvements for J14 will fully accommodate traffic growth associated with the SDC Local Plan.</p> <p>The reference to the scheme being delivered until 2041 is an incorrect interpretation. 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</p>

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			implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.
026	Graham Ellis	M5 J14 is clearly at capacity now. Therefore any additional strain on this junction should not be permitted until there is a clear, defined and funded way forwards. While the potential upgrades are very pretty, they 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. As there has been no agreement on funding this upgrade, It should not be assumed as being 'available' for the purposes of the local plan. It is worth noting that "As no time frame or programme has been agreed inflation has been excluded" (p135 of EB133a), so we can guarantee that the proposed project cost will increase.	<p>SDC acknowledges the capacity issues at J14, and improvements to the junction are being promoted for this reason. The level of detail provided in relation to the scheme designs and costs is proportionate to the current planning and Local Plan stages. Significant allowances, such as for risk, contingency and Optimism Bias, are included in the cost estimates as appropriate for this stage of design. SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5<sup>th</sup> February 2024, that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</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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		<p>The SGC New Local Plan have confirmed that it is not currently looking to allocate development which will impact on M5 J14, and therefore any contribution to funding is not expected.</p> <p>In conclusion, the proposed works to M5 J14 do NOT resolve the junction capacity constraints.</p>	<p>all key stakeholders, including NH, the central government and the private sector.</p> <p>Whilst the precise year that the scheme will be delivered is to be finalised, 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>In relation to inflation, EB133 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.</p> <p>A SoCG with SGC will be submitted to the Inspectors on 5<sup>th</sup> December which confirms this point. EB133b outlines that 15% of the funding will be from contributions from local development, with a 'worst-case' scenario</p>

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			<p>assuming that all of this would be from SDC Local Plan.</p> <p>It should be noted that the background traffic growth forecasts include allowances for growth outside Stroud District, in line with DfT methodology. The scheme design has been demonstrated to be able to accommodate SDLP traffic and background growth. This robust assessment shows that it would resolve junction capacity constraints.</p>
027	Sian Hill	<p>The proposed works to M5 Junction 14 are not effective for several reasons: firstly, government funding for this work is not guaranteed; secondly, there is no date given for the improvements to be completed. Also, National Highways have stated that they will not grant permission for additional housing because the junction is at capacity so house building of big estates such as Cam and Wisloe would be delayed until the work has been completed in 2041 at the very earliest. Finally, the purchase of bits of land in order to make the improvements to the junction has not been</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>Whilst the precise year that the scheme will be delivered is to be finalised, the reference to the scheme being delivered after 2041 is an</p>



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		<p>explained to give any confidence that it will happen.</p>	<p>incorrect interpretation of EB133a. 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. As has been discussed extensively in the EiP, SDC understands NH's position that no new traffic can be added to J14 without mitigation.</p> <p>Details over any third-party land required to deliver the improvement at J14 have not been provided given the sensitivities involved. However, suitable allowance has been made</p>

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			within the scheme costings for land, along with suitable levels of contingency and optimism bias. At the appropriate stage, discussions will be held with land owners with regards to commercial arrangements.
029	Sarah Bowles	No, the proposed plan will not overcome the capacity constraints to Local Plan (LP) growth. There is no secured government funding in place for the junction improvement, with 2041 thought to be a likely date – given that National Highways will not support any developments that will exacerbate traffic issues, those developments should not be included in the Local Plan until the transport infrastructure can cope with the additional loading.	<p>The strategic case for funding is outlined in EB133b. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including National Highways, 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 EB133a. 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>Total budget for improvements to J12 and J14 is around £375m, plus the cost of improvements at J9 for Tewkesbury and many other schemes - this cannot be met by local ratepayers and definitely not at the cost of all other local authority services.</p> <p>Modelling and design 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.</p> <p>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.</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>trajectories, as outlined in as outlined in EB134 and EB135.</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 Government, and would not be at the expense of local ratepayers or other local authority services.</p> <p>The results of microsimulation modelling, as outlined in EB133c, confirm that improvements for J14 will fully accommodate traffic growth associated with the SDC Local Plan. Cross-boundary impacts and growth from within the SLP area (Gloucester, Cheltenham, Tewkesbury) and SGC have been assessed appropriately within this modelling using the traffic flow outputs from regional strategic modelling. Further information on the strategic modelling is available in EB61 and</p>

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			<p>EB98. The scheme design, costing and assessment has been undertaken in consultation with GCC.</p> <p>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 the J14 improvements have been implemented.</p>
031	John Humphries	This needs to be done as house construction commences, if not before	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.
032	David Thombs	The proposed plan will not overcome the capacity constraints to Local Plan (LP) growth. There is no mention in report EB133a or EB133b regarding the timescales to secure the Government funding required, the likelihood of success or delivery	The improvements to J14 will be completed early in the Local Plan period, and 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

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		<p>date. NH has stated J14 was at capacity now. There is no RIS3 (2025-2030), NSIP funding for J14 nor any plans to develop the junction. GCC in EB133c assumed a delivery in 2041 for the J12 change, which is realistic. Therefore, the existing LP which schedules strategic housing deliveries in areas which will increase J14 load significantly should not be included within the LP until after the J14 roundabout is built, which could be 2041.</p>	<p>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. 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 J12 scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements for J12 will be completed significantly before 2041 as will those for J14.</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</p>

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		<p>The cost estimates in EB133a &amp; b are optimistic when compared with other similar size and scope projects. There is a lack of consistency between costing approaches for J14 compared with J12.</p>	<p>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.</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>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>

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		<p>The SoCG have not been published. South Glos DC has stated it will not assist with funding J14. the LP is therefore not deliverable and is unsound.</p>	<p>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors.</p> <p>South Gloucestershire have submitted their current position on M5 Junction 14 as:</p> <p><i>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.</i></p> <p><i>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</i></p>

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			<i>be created should it be concluded that the plan could not be progressed to adoption.</i>
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 <sup>th</sup> February 2024 and is confident that a scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
034	Owen Leleu	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 near to motorway junction 13 where there is no capacity issues. I believe this is disproportionate to the LP building proposals of SDC Housing Delivery	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.



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			<p>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>National Highways state that this junction is already up to capacity and state that they would not allow any further large scale development that will further impact on this junction.</p>	<p>SDC acknowledges this point, and improvements to J14 are being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The design, modelling and cost of the J14 improvement have been developed in consultation with NH, and SDC acknowledge that the improvements will be required early in the Local Plan period.</p>
		<p>There is no mention in reports EB133a or 133b of secured funding, timescales or delivery dates.</p>	<p>The timing of the improvement scheme is to be confirmed, but SDC expect the improvements will be completed significantly before 2041.</p>
		<p>As there are no timescales or delivery dates then it is likely that improvements at this junction may also not take place until 2041.</p>	<p>EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period, and SDC are confident that</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>This will constrain the the LP housing growth significantly until the works are completed in 2041.</p> <p>I believe the works to this junction will not be effective and overcome the capacity constraints for the reasons given above and therefore I believe the LP is not deliverable or sound</p>	<p>the junction enhancements will be implemented to accommodate planned housing growth trajectories, as outlined in as outlined in EB134 and EB135.</p>
035	Danielle Ellis	<p>The plan does not overcome the capacity constraints on J14. This junction is actually located in South Gloucestershire. There are no government funds earmarked to improve Junction 14. National Highways state the junction is already at capacity and additional traffic from new housing would exacerbate the situation</p>	<p>SDC acknowledge that J14 is located in South Gloucestershire. SDC agreed to progress technical work on J14 given that the SDC Local Plan requires improvements to this junction and SGC has advised that its new Local Plan is not expected to impact J14 (see SoCG). SGC have been consulted throughout the development of the scheme design, costing and modelling which will continue to be so in the future stages of planning.</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</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			<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>SDC acknowledge that the junction is at capacity, and improvements to J14 are being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The design, modelling and cost of the J14 improvement have been developed in consultation with NH, and SDC acknowledge that the improvements will be required early in the Local Plan period.</p>
036	Jessica Cuthbert-Smith	No, the plan will not overcome the capacity constraints of junction, which is already at capacity. There is no planned funding, time scale or measurable likelihood of success.	<p>The results of microsimulation modelling, as outlined in EB133a, confirm that the improvements for J14 will fully accommodate traffic growth associated with the SDC 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>

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			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.
037	David Scammell	<p>National Highways (NH) state that J14 is at capacity now and would not permit any further significant level of housing development.</p> <p>Reports EB133a and EB133b do not identify Government funding, timescales, the likelihood of success or delivery date.</p> <p>Delivery of the proposed work is unlikely until 2041. Housing development would be post 2041.</p>	<p>SDC acknowledge that the junction is at capacity, and improvements to J14 are being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The design, modelling and cost of the J14 improvement have been developed in consultation with NH, and SDC acknowledge that the improvements will be required early in the Local Plan period.</p> <p>The strategic case for funding is outlined in EB133b. SDC is continuing to promote and discuss the junction improvements amongst all key stakeholders, including NH, the central government and the private sector.</p> <p>The timing of the improvement scheme is to be confirmed, but SDC expect the improvements</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			<p>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 reference to the scheme being delivered after 2041 is an incorrect interpretation. The improvements will be completed significantly before 2041.</p> <p>Improvements to J14 are being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The design, modelling and cost of the J14 improvement have been developed in consultation with NH, and SDC acknowledge that the improvements will be required early in the Local Plan period.</p>
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

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			and NH that mitigation at J14 will address existing issues, and those which will happen in the absence of the Plan, and the Plan itself.
039	Philip Butcher	<p>No. The plan will not overcome the capacity constraints on Junction 14. The reports EB133a and EB133b do not identify any Government funding, timescales, the likelihood of success or delivery date. The suggested costs have too conservative a contingency and the examples of comparative projects are not as complex. National Highways have stated that Junction 14 is at capacity and would not permit any further significant level of housing development. Delivery of the upgrade to Junction 14 is unlikely to happen before 2041 and any housing development would, therefore, have to be post 2041</p>	<p>The local 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 timing of the improvement scheme is to be confirmed, but SDC expect 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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			<p>The level of detail provided on scheme costs is proportionate to the current planning stage. The costs have been benchmarked against what SDC consider to be 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>
040	Doreen Brimble	<p>I support Slimbridge Parish Council's consultation submission.</p> <p>The proposed plan will not overcome the capacity constraints on M5 Junction 14.</p> <p>Reports EB133a and EB133b do not identify any agreed funding (&amp; no commitments), timescales, the likelihood of success or delivery date. National Highways (NH) state that M5 Junction 14 is</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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		<p>already at capacity and would not permit any further significant level of housing development. Delivery is unlikely until 2041 even if full funding could be secured. The modelling does not take into account additional journeys for housing that has recently be built in Thornbury or those planned to be built.</p>	<p>will be suitable to accommodate planned levels of traffic growth.</p> <p>The timing of the improvement scheme is to be confirmed, but SDC expect 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>Growth from committed developments and cross-boundary growth from within the SLP area (Gloucester, Cheltenham, Tewkesbury) and SGC have been assessed appropriately within this modelling using the traffic flow outputs from regional strategic modelling. Further information on the strategic modelling is available in EB61 and EB98.</p>
		<p>South Gloucestershire Council do not support enhancements or upgrading of M5 Junction 14 as this does not align with their draft local plan and they state it will increase unsustainable commuting to and from Bristol (social and</p>	<p>South Gloucestershire have submitted their current position on M5 Junction 14 as:</p> <p><i>South Gloucestershire Council raises no further in principle objections to the Stroud</i></p>



Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>business commuting). Please refer to the Regulation 18 (Phase 3) session held online 13th November 2023 (1 hour 17 mins in). Councillor REDACTED stated "no point on basing plans if they do not feature and do not have government plan for funding. In a question about the where to build them "if you build on the other side of the green belt".....it will lead to "trans-green belt commutes". Councillor REDACTED confirmed the support for the previous administration's focus on dispersal. Councillor REDACTED stated the plan "has to be entirely evidence based".</p>	<p><i>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.</i></p> <p><i>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 created should it be concluded that the plan could not be progressed to adoption.</i></p>
041	Thomas Owens	<p>I support Slimbridge Parish Council's consultation submission.</p> <p>The proposed plan will not overcome the capacity constraints on M5 Junction 14.</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>

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		<p>Reports EB133a and EB133b do not identify any agreed funding (&amp; no commitments), timescales, the likelihood of success or delivery date.</p> <p>National Highways (NH) state that M5 Junction 14 is already at capacity and would not permit any further significant level of housing development. Delivery is unlikely until 2041 even if full funding could be secured. The modelling does not take into account additional journeys for housing that has recently be built in Thornbury or those planned to be built.</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.</p> <p>The timing of the improvement scheme is to be confirmed, but SDC expect 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>Growth from committed developments and cross-boundary growth from within the SLP area (Gloucester, Cheltenham, Tewkesbury) and SGC has been assessed appropriately within this modelling using the traffic flow outputs from regional strategic modelling. Further information on the strategic modelling is available in EB61 and EB98.</p>

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042	Andrew Davis	<p>No, the proposed plan will not overcome the capacity constraints to LP growth. There is no mention in report EB133a or EB133b regarding the timescales to secure the Government funding required, the likelihood of success or delivery date (ref ID15, 4, iii). NH has stated J14 was at capacity now and would not permit further significant housing development which would impact J14. Furthermore, there is no RIS3 (2025-2030), NSIP funding for J14 nor any plans to develop the junction. GCC in EB133c assumed a delivery in 2041 for the J12 change, which is realistic. Therefore, the existing LP which schedules strategic housing deliveries in areas which will increase J14 load significantly should not be included within the LP until after the J14 roundabout is built, which could be 2041. The indeterminate date and unsecured funding for the roundabout, will constrain the LP growth significantly until it is completed. As it stands, the LP is therefore not deliverable and is unsound.</p>	<p>The local 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 timing of the improvement scheme is to be confirmed, but SDC expect 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>
		Analysis indicates the cost estimates in EB133a & b are optimistic when compared with other similar size and scope projects. There is a lack of	The level of detail provided on scheme costs is proportionate to the current planning stage. The costs have been benchmarked against

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		<p>consistency between costing approaches for J14 compared with J12 (risk, inflation, optimism bias etc), which suggests the J14 estimate should be relatively higher.</p>	<p>comparable motorway improvement 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. Also, South Glos DC has stated it will not assist with funding J14 as car commuting is not part of its strategy.</p>	<p>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors.</p> <p>South Gloucestershire have submitted their current position on M5 Junction 14 as:</p> <p><i>South Gloucestershire Council raises no further in principle objections to the Stroud</i></p>

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			<p><i>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.</i></p> <p><i>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 created should it be concluded that the plan could not be progressed to adoption.</i></p>
043	Kirk Walton	Again will Jn 14 be more important in Highway(s) priorities than 9, 12, or 13?I think Jn 9 will be more important to the County then Jn 14 No one is	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

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		talking about Jn 13 but that has a bearing on 12 & 14.	<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>Junction 13 is not referred to in the additional technical work which is the subject of this consultation, as the impact of the Local Plan does not require a mitigation scheme.</p>
044	Helen Bamber	The plan will not overcome the capacity constraints on J14.	The local strategic case for funding is outlined in EB133b, which shows a strong, clear and

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		<p>Reports EB133a and EB133b do not identify Government funding, timescales, the likelihood of success or delivery date.</p> <p>National Highways (NH) state that J14 is at capacity now and would not permit any further significant level of housing development.</p>	<p>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 timing of the improvement scheme is to be confirmed, but SDC expect 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>Improvements to J14 are being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The design, modelling and cost of the J14 improvement have been developed in consultation with NH, and SDC acknowledge</p>

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			that the improvements will be required early in the Local Plan period.
045	Berkeley Town Council	Berkeley Town Council has great concerns about the effectiveness of the proposed plans to modify J14 in view of the large increase in traffic which will be generated if the Local Plan goes ahead as suggested. The lack of alternative transport provision for Sharpness will force commuters to use their cars.	<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 as accommodating traffic demand from background sources and development outside of the District.</p> <p>The opportunities to promote sustainable transport at all of the proposed allocations have been outlined in the Sustainable Transport Strategy (STS) – EB108.</p>
046	Wisloe Action Group	No, the proposed plan will not overcome the capacity constraints to LP growth. There is no mention in report EB133a or EB133b regarding the timescales to secure the Government funding required, the likelihood of success or delivery date (ref ID15, 4, iii). NH has stated J14 was at capacity now and would not permit further significant housing development which would impact J14.	The local 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



Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>Furthermore, there is no RIS3 (2025-2030), NSIP funding for J14 nor any plans to develop the junction. GCC in EB133c assumed a delivery in 2041 for the J12 change, which is realistic. Therefore, the existing LP which schedules strategic housing deliveries in areas which will increase J14 load significantly should not be included within the LP until after the J14 roundabout is built, which could be 2041. The indeterminate date and unsecured funding for the roundabout, will constrain the LP growth significantly until it is completed. As it stands, the LP is therefore not deliverable and is unsound.</p>	<p>will be suitable to accommodate planned levels of traffic growth.</p> <p>The timing of the improvement scheme is to be confirmed, but SDC expect 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. 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</p>

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			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 exercise is underway at present, and NH intends to be in a position to update the EiP when it re-opens
		Analysis indicates the cost estimates in EB133a & b are optimistic when compared with other similar size and scope projects. There is a lack of consistency between costing approaches for J14 compared with J12 (risk, inflation, optimism bias etc), which suggests the J14 estimate should be relatively higher.	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, 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

<b>Rep Number</b>	<b>Stakeholder Name Organisation OBO</b>	<b>Comments</b>	<b>SDC Response</b>
			consistent, although some alternative assumptions to account for contingency, bias, land etc. have been made owing to the differences in scheme design.
		The complimentary SoCG have not been published to-date suggesting the report contents have not been agreed by NH. Also, South Glos DC has stated it will not assist with funding J14 as car commuting is not part of its strategy.	SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors.  EB133b sets out the funding approach for the junctions. This does not rely on funding from South Gloucestershire.
047	Stagecoach West	We have reviewed the consultation documents, we don't believe that there is any additional detail or mitigations to what was raised at the reg 19 stage.	Since the Regulation 19 stage and through this consultation, the council has produced, modelled and tested M5 J14 scenario design options, and presented a preferred design and a costing exercise.
050	Hamfallow Parish Council	These are weak arguments, which are not supported by evidence. Costings are also unevidenced and realistic sources of significant funding have not been identified, so the necessary	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

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		improvements are most unlikely to take place in the requisite timescale.	<p>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.</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>

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051	Scott Temlett	There will still be underlying issues with the amount of traffic using J14. The plan does nothing to alleviate this.	Improvements to J14 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 EB133a, confirm that the proposed improvements for J14 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 for junction improvements, within the timescales provided.	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.
		The current report states a delivery date for any junction improvements will be not until 2041	The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133a. The improvements will be completed

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			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 J14 is at maximum capacity with the amount of housing in the local area already built. This does not permit any more mass housing developments.	Please refer to comments above.
		Any future major housing developments in Cam and Wisloe will hugely impact J14.	The modelling of the J14 improvement scheme has given due consideration to the level of development which will impact on J14 from SDC Local Plan allocations.
		The above statements means the plan is totally unachievable.	Comment is noted.
052	Alex Hunter	The above undermines the feasibility of the Plan and is not achievable.	Comment is noted.  The evidence presented has provided a scheme design and demonstrated through

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			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.
053	Falfield Parish Council	No discussions held with Falfield Parish Council despite works being within our parish. The proposals are not acceptable because:	Falfield Parish Council are considered a statutory consultee and have been invited to respond at each consultation stage of the Local Plan process.

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		<p>There's no pedestrian footpath provision between Falfield and Tortworth over J14, it proposes B4509 west arm dualling and widening and pedestrians walking on a 1:3 grass embankment.</p>	<p>The level of detail provided in relation to the junction design, including the provision for active travel has been at a 'concept' level in order to prepare scheme costs and demonstrate that there is a reasonable prospect of a J14 scheme being deliverable. It is therefore not a final scheme; a concept level of detail has been provided proportionate to the current planning stage of the scheme and SDC Local Plan. As indicated in EB133a (paragraph 2.6.3), the improvements to this junction will be "addressed through future planning applications and is not a specific requirement of progressing the M5 J14 project".</p> <p>The design for J14 has been consulted on and agreed with NH as the strategic highway authorities.</p>
		<p>Two existing bus stops serving buses to and from Bristol on the B4509 west arm are not indicated anywhere. S106 funding is in place to improve visibility and pedestrian provision at these stops.</p>	<p>There is no on-street evidence of bus stops on the B4509, although these are included in publicly available mapping. These are shown close to the A38 junction, which will be upgraded. There is scope to incorporate this into the design for this junction at the time.</p>



Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			SGC as the LHA has not advised of any plans to install or upgrade bus stops at this location.
		Improvements to A38 /B4509 junction are not well defined. Deferring solution and costs to future planning applications is not acceptable as all proposals may be detrimental to Falfield.	As stated above, the current consultation is specifically in relation to the new evidence submitted in relation to J14. Improvements to the A38 / B4509 junction have been considered at a concept level to inform this evidence only.  Further consideration for the funding and delivery of wider highway mitigation for the SDC Local Plan (including the A38 / B4509 junction) are included in the IDP (EB110).
		There is little consideration of the extent and impact of queuing traffic on A38, due to increased traffic volume and longer wait times at A38 lights holding back more vehicles to keep the B4509 free flowing. EB136 Appendix 1 acknowledges this worsens with the Sharpness housing but not for the full housing quotas.	The microsimulation modelling evidence has considered the A38/B4059 junction and M5 Junction 14 as a linked network. The impact on both of these has been examined through the modelling. A concept design has been prepared for the A38/B4059 junction which demonstrates that impacts can be mitigated.
		No signalled pedestrian crossing of A38 in Falfield, more traffic and longer queues increases danger to residents and schoolchildren who cross this road daily.	Please refer to SDC response in relation to active travel above.  The concept design for the A38 / B4509 junction shows signalised crossings over the

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			B4509 replacing and upgrading the existing uncontrolled facility. As stated, the detailed design of this scheme will be progressed through planning applications, as this is identified as highways mitigation through the IDP (EB110)
		No consideration of environmental amenity and quality of life impact on existing communities down the road from the strategic sites who bear the brunt of the output of the road closures and additional traffic generated by new developments, i.e. increased congestion, road noise and poorer air quality. Mitigation measures required for those adversely impacted.	The full assessment of sites including SA and Environmental Assessments are available in the Examination Library. This consultation is focused on the design and costings for M5 J14.
		No Vat / inflation costings.	In relation to inflation, EB133a 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.  National Highways has confirmed that the costs are within the range that it would expect.

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
054	Stephen Willetts	<p>No, capacity constraints to Local Plan growth are not overcome.</p> <p>Reports EB133a and EB133b give no timescales to secure Government funding, the likelihood of success nor delivery date as required by Letter ID15 4 iii. NH state J14 is at capacity now and would not permit further significant housing development impacting J14. There is no RIS3 (2025-2030) or NSIP funding identified nor any plans to develop the junction indicated. SGC has stated it will not assist with funding J14 as car commuting is not part of its strategy.</p>	<p>The local 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 timing of the improvement scheme is to be confirmed, but SDC expect 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</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			<p>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, 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>SDC accepts that SGC may not be able to assist with funding, and this is outlined in the SoCG which will be submitted on 5<sup>th</sup> December. EB133b 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</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			contribution will be addressed through the future stages of the EiP.
		Cost estimates in EB133a & b are optimistic when more appropriate similar size and scope projects are used for comparison. Costing approaches for J14 compared to J12 are not consistent with respect to risk, inflation, optimism bias. A significantly higher cost for J14 would result if the more realistic approach taken for J12 was used and more appropriate comparisons made.	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.
		GCC in EB133c assumed a realistic delivery in 2041 for the J12 change. Scheduling strategic housing deliveries in areas which increase J14 load significantly should not be included within	The reference to the J12 scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements will be completed significantly before 2041.

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>the LP until after J14 roundabout is built, which could reasonably be 2041.</p> <p>There is no Statement Of Common Ground with NH, GCC nor SGC published which is vital given how this work has been sponsored and delivered suggesting the report is not agreed by them. The LP is therefore not deliverable and remains unsound for the most fundamental of reasons; no clear funding and delivery much later than needed.</p>	<p>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>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors.</p>
055	Slimbridge Parish Council	No, the proposed plan will not overcome the capacity constraints to Local Plan (LP) growth. There is no mention in report EB133a or EB133b regarding the timescales to secure the Government funding required, the likelihood of success or delivery date (ref ID15, 4, iii). NH has stated J14 was at capacity now and would not permit further significant housing development	The results of microsimulation modelling, as outlined in EB133a, confirm that the improvements for J14 will fully accommodate traffic growth associated with the SDC Local Plan.

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>which would impact J14. Furthermore, there is no RIS3 (2025-2030), NSIP funding for J14 nor any plans to develop the junction. GCC in EB133c assumed a delivery in 2041 for the J12 change, which is realistic. Therefore, the existing LP which schedules strategic housing deliveries in areas which will increase J14 load significantly should not be included within the LP until after the J14 roundabout is built, which could be 2041. The indeterminate date and unsecured funding for the roundabout, will constrain the LP growth significantly until it is completed. As it stands, the LP is therefore not deliverable and is unsound.</p>	<p>The timing of the improvement scheme is to be confirmed, but SDC expect 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.</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 J12 scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements for J12 will be completed significantly before 2041 as will those for J14. EB134 and EB135 includes housing trajectories for a range of scenarios including with and without the delivery of improvements to J12.</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			<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. 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>Analysis indicates the cost estimates in EB133a &amp; b are optimistic when compared with other similar size and scope projects. There is a lack of consistency between costing approaches for J14 compared with J12 (risk, inflation, optimism bias etc), which suggests the J14 estimate should be relatively higher.</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</p>



Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>The complimentary SoCG have not been published to-date suggesting the report contents have not been agreed by NH. Also, South Glos DC has stated it will not assist with funding J14 as car commuting is not part of its strategy.</p>	<p>been made owing to the differences in scheme design.</p> <p>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors.</p> <p>EB133b sets out the funding approach for the junctions. This does not rely on funding from South Gloucestershire.</p>
056	Cllr Lindsey Green Stroud District Council	<p>No, the proposed plan will not overcome the capacity constraints to Local Plan (LP) growth. There is no mention in report EB133a or EB133b regarding the timescales to secure the Government funding required, the likelihood of success or delivery date (ref ID15, 4, iii). NH has stated J14 was at capacity now and would not permit further significant housing development which would impact J14. Furthermore, there is no RIS3 (2025-2030), NSIP funding for J14 nor any plans to develop the junction. GCC in EB133c assumed a delivery in 2041 for the J12 change, which is realistic. Therefore, the existing LP which schedules strategic housing deliveries in areas which will increase J14 load significantly should</p>	<p>The results of microsimulation modelling, as outlined in EB133a, confirm that the improvements for J14 will fully accommodate traffic growth associated with the SDC Local Plan.</p> <p>The timing of the improvement scheme is to be confirmed, but SDC expect 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.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>not be included within the LP until after the J14 roundabout is built, which could be 2041. The indeterminate date and unsecured funding for the roundabout, will constrain the LP growth significantly until it is completed. As it stands, the LP is therefore not deliverable and is unsound.</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 and will be suitable to accommodate planned levels of traffic growth.</p> <p>The reference to the J12 scheme being delivered after 2041 is an incorrect interpretation of EB133c. The improvements for J12 will be completed significantly before 2041 as will those for J14. EB134 and EB135 includes housing trajectories for a range of scenarios including with and without the delivery of improvements to J12.</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. 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>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>Analysis indicates the cost estimates in EB133a &amp; b are optimistic when compared with other similar size and scope projects. There is a lack of consistency between costing approaches for J14 compared with J12 (risk, inflation, optimism bias etc), which suggests the J14 estimate should be relatively higher.</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. Also, South Glos DC has stated it will not assist with funding J14 as car commuting is not part of its strategy.</p>	<p>SoCG are not consultation documents and will be submitted 5 December 2024 to the Inspectors.</p> <p>EB133b sets out the funding approach for the junctions. This does not rely on funding from South Gloucestershire.</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
057	John Mace	<p>Nothing is cheap if it fails to solve the problem.  Nothing is expensive (within limits) if it does.  Traffic flows indeterminate - realism often exceeds planning!</p>	<p>The modelling has identified that the scheme will solve the problem of background traffic growth and traffic from the SDLP. An Order of Cost Estimate has been presented which is considered accurate for the stage of design. SDC makes no comment on whether the scheme should be considered to be cheap or expensive.</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 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</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			funding. SDC is in discussion with central government to progress this matter.
058	Carl Merry	Again government funding sources are not identified as per Reports E133a and E133b nor timescales of completion or application success. NH state that Jn 14 is at capacity and would not permit significant further development.	<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>As has been discussed extensively in the EiP, SDC understands NH's position that no new traffic can be added to J14 without mitigation. Improvements to J14 are therefore being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic.</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
059	Haydn Jones	<p>M5J14 is already recognised as being at or beyond capacity. National Highways have confirmed they currently have no plans to upgrade the junction and further significant housing development that impacts the junction would be blocked by them. Funding for M5J14 and associated works has not been identified and South Gloucestershire Council, in who's area the junction sits, do not support its development. The proposals do not overcome constraints to local plan growth.</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. Improvements to J14 are therefore being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic.</p> <p>The plans for the improvement to J14 have been prepared in consultation with NHs who accept that the scheme will provide the necessary capacity and that the costs outlined are in accordance with what they would expect. 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>South Gloucestershire have submitted their current position on M5 Junction 14 as:</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			<p><i>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.</i></p> <p><i>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 created should it be concluded that the plan could not be progressed to adoption.</i></p>
		<p>I also note that the current Government Minister has suggested the pragmatism granted to inspectors in 2015 has 'gone too far and has perversely led to years of delays'. He goes on to</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</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>suggest that 'pragmatism should be used only where it is likely a plan is capable of being found sound with limited additional work'. The additional work that has gone into this plan has been drawn out, extensive, expensive, is very far from complete and remains contested by local residents, parish and town councils, campaigning bodies, the Highways Authority and local authorities including the adjoining authority in which M5J14 sits. Despite informed advice to the contrary from Planning Inspectors and others, Stroud District Council have dogmatically clung to their flawed, pre-determined A38/M5 corridor strategy despite the need for a level of financial investment from central Government that will clearly never be delivered within the plan period. This plan should be withdrawn in favour of a new plan that works within the constraints of existing available infrastructure.</p>	<p>Inspector's requirements as outlined in their letter of 5<sup>th</sup> 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>It should be noted that the proposals for J14 have support from SGC, GCC and NH as evidenced through the SoCG which will be submitted to the EiP on 5<sup>th</sup> December.</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</p>



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			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.
060	Savills on behalf of Catesby Estates	The further information currently being consulted upon does not address or overcome the fundamental concerns that have been expressed regarding the feasibility and viability of a sustainable access strategy for the proposed Sharpness New Community. We remain of the view that Sharpness is fundamentally therefore an unsustainable and unsound location for strategic scale development.	Addressing or overcoming any concerns regarding the feasibility and viability of a sustainable access strategy for the proposed Sharpness New Community has not been the purpose of this consultation.  SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5 <sup>th</sup> February 2024 and is confident that the scheme is deliverable at J14 and will be suitable to accommodate planned levels of traffic growth from all allocations in the SDC Local Plan.

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
061	Denis Bannister	<p>The proposed works will not overcome the capacity constraints on Junction 14. No funding is identified. No timescale is provided. No delivery date is offered although it can be assume to be post 2041 judged by the Junction 12 proposal.</p> <p>There is a serious safety issue to motorway traffic exiting at the junction if the current constraints are further exceeded and vehicles wishing to exit back up onto the hard shoulder and lane 1.</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. The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133a and EB133c. The improvements for both J12 and J14 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. Improvements to J14 are therefore being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The modelling has shown that the</p>

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			proposed scheme can accommodate the required level of traffic without queues extending past the end of the slip road.
063	Shelagh Daley	<p>Junction 14 is not part of SDC's catchment area and therefore has no authority over South Gloucestershire to carry out any feasibility study on ways to improve this junction. As a result how can SDC provide either timescales or budgets for this junction to be improved in order to accommodate any development in the area?</p>	<p>SDC acknowledge that J14 is located in South Gloucestershire. SDC agreed to undertake feasibility work on J14 given that the SDC Local Plan requires improvements to this junction and SGC has advised that its new Local Plan is not expected to impact J14 (see SoCG). SGC have been consulted throughout the development of the scheme design, costing and modelling which will continue to the future stages of planning.</p>
		<p>As there are no timescales or accurate budgets available for improvement to this junction how can SDC attempt to deliver a Local Plan? I therefore believe that the Local Plan is not sound.</p>	<p>Whilst the precise year that the scheme will be delivered is to be finalised, 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>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			<p>The cost for implementing the improvement to J14 are included in EB133a. 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>
064	Jo Kendall	The technical documents do not answer the inspectors' questions from February 2024 and therefore the plan must be considered unsound	SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5 <sup>th</sup> February 2024 and 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
065	Elaine Pearce	Where is the funding for this project? National Highways have already said J14 is at capacity now.	<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>As has been discussed extensively in the EiP, SDC understands NH's position that no new traffic can be added to J14 without mitigation. Improvements to J14 are therefore being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic.</p>
066	Catherine Wayne	There is no evidence how a major development at J14 of the M5 would be funded and therefore whether it could be delivered within the lifetime of this Local Plan. Evidence of meaningful co-operation with neighbouring authorities is	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

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>missing, not least as S. Gloucestershire have no current plans to develop housing that would impact on junction 14. The Inspectors' letter of 4 August 2023 stated that there was no clear evidence as to how the required improvements to the Strategic Road Network would be funded and secured, and that 'convincing evidence on these points (is) fundamental to the soundness of the Plan'. Nothing in the new evidence provided positively addresses the understandable concerns raised by the Inspectors.</p>	<p>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>There has been extensive co-operation and collaboration between the local highway authorities and NHs in the preparation of scheme design, modelling and costing, including SGC.</p> <p>South Gloucestershire have submitted their current position on M5 Junction 14 as:</p> <p><i>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.</i></p> <p><i>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</i></p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
			<p><i>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 created should it be concluded that the plan could not be progressed to adoption.</i></p> <p>SDC is confident that the level of information provided has fully addressed the Inspector’s requirements as outlined in their letter of 5<sup>th</sup> February 2024 and is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.</p>
067	Sally Allen	These plans will not address the amount of proposed traffic at this already busy junction With no clear funding identified in either report, or clear dates on when it is likely to happen will leave this junction at crises point national highways have already stated that there is no further capacity as the junction stands now, so any further developments without the prior infrastructure in	<p>Improvements to J12 / J14 are being promoted owing to the existing constraints on the local network and the likely additional impact of SDLP development. The schemes will ensure suitable future operation.</p> <p>The strategic case for funding is outlined in EB133b, which shows a strong, clear and multi-faceted rationale for central government</p>

Rep Number	Stakeholder Name Organisation OBO	Comments	SDC Response
		<p>place would be detrimental. For those that use these junctions and whenever the M5 is closed the impact on all the roads around these junctions is gridlock, with additional building the impact will be catastrophic</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 and will be suitable to accommodate planned levels of traffic growth.</p> <p>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. Improvements to J14 are therefore being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The results of microsimulation modelling, as outlined in EB133a, confirm that the improvements for J14 will fully</p>



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			<p>accommodate traffic growth associated with the SDC Local Plan.</p> <p>The proposed enhancements to the junction will provide greater resilience to the local highway network surrounding J14. Improvements to the A38 / B4509 junction are also promoted through the SDC Local Plan.</p>
069	Berkeley and Sharpness Residents' Action Group (BaSRAG)	<p>Fundamentally, there is no evidence as to how a major development at junction 14 of the M5 would be financed and therefore whether it could be delivered within the lifetime of this Local Plan. There is no evidence of meaningful co-operation leading to agreement with neighbouring authorities, not least because South Gloucestershire have no current plans to develop housing that would impact on junction 14. The Inspectors' letter of 4 August 2023 stated that there was no clear evidence as to how the required improvements to the Strategic Road Network would be funded and secured, and that 'convincing evidence on these points (is) fundamental to the soundness of the Plan'. Nothing in the new evidence provided positively</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 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. This is evidenced</p>

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		addresses the understandable concerns raised by the Inspectors.	through the SoCG which will be submitted on 5 <sup>th</sup> December.  SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5 <sup>th</sup> February 2024 and is confident that the scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.
070	Gillian Delve	No! J14 is at capacity now, according to National Highways and they will not permit any more large housing developments until this is resolved. Given that there are a large number of houses already being built at this time in both South Gloucestershire's and Stroud's Council areas, these are already going to impact on this junction. Examples of this are at Falfield, Charfield, Thornbury, Cam/Draycott, Berkeley, Newport etc. Again there appears to be no funding for this and a possible delivery date of 2041 was mentioned which is outside the scope of this Plan.	As has been discussed extensively in the EiP, SDC understands NH's position that no new traffic can be added to J14 without mitigation. Improvements to J14 are therefore being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The results of microsimulation modelling, as outlined in EB133a, confirm that the improvements for J14 will fully accommodate traffic growth associated with the SDC Local Plan as well as background traffic and housing growth outside of Stroud District.

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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.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133a. 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>
071	Darius Ferrigno	<p>The plan will not overcome the capacity constraints on J14.</p> <p>Reports EB133a and EB133b do not identify Government funding, timescales, the likelihood of success or delivery date.</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 as accommodating traffic demand from</p>

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			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.
		Delivery is unlikely until 2041. Housing development would be post 2041.	The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133a. 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.

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		National Highways (NH) state that J14 is at capacity now and would not permit any further significant level of housing development.	As has been discussed extensively in the EiP, SDC understands NH's position that no new traffic can be added to J14 without mitigation. Improvements to J14 are therefore being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The results of microsimulation modelling, as outlined in EB133a, confirm that the improvements for J14 will fully accommodate traffic growth associated with the SDC Local Plan.
075	Sarah Jones	<p>The plan will not resolve the capacity constraints for M5 Junction 14. National Highways (NH) state it is at capacity and not permit further dwellings. The modelling doesn't take into account new dwellings in Thornbury / A38 corridor and permissions impacting the junction.</p> <p>South Gloucestershire Council do not support work at Junction 14, publicly stating it will create unsustainable commuting to and from Bristol (Regulation 18 Phase 3 session 13/11/24 (1 hour 17 mins). Councillor REDACTED states "...no point</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. Improvements to J14 are therefore being promoted for this reason. The scheme will ensure suitable future operation accounting for both background and planned growth in traffic. The results of microsimulation modelling, as outlined in EB133a, confirm that the improvements for J14 will fully

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		<p>basing plans if they do not feature and do not have government plans for funding"...and "if you build on the other side of the green belt".....lead to "trans-green belt commutes". Councillor REDACTED supports dispersal. Councillor REDACTED stated the plan "has to be entirely evidence based". This is evidence from SGC with regard to their intentions.</p> <p>The SOCG not published and the deadline has passed.</p> <p>SMR referenced but there is no evidence to support this will be committed.</p>	<p>accommodate traffic growth associated with the SDC Local Plan.</p> <p>Growth from committed developments and cross-boundary growth from within the SLP area (Gloucester, Cheltenham, Tewkesbury) and SGC have been assessed appropriately within this modelling using the traffic flow outputs from regional strategic modelling. Further information on the strategic modelling is available in EB61 and EB98.</p> <p>The deadline for SoCG has not passed as it is not a requirement of the consultation process. The intention is to publish Updated SoCG on the 5<sup>th</sup> December as SDC reports back to the Inspectors, as agreed with themselves. South Gloucestershire have submitted their current position on M5 Junction 14 as:</p> <p><i>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</i></p>

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			<p><i>Council made to the Reg 19 Stroud District Council Local Plan.</i></p> <p><i>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 created should it be concluded that the plan could not be progressed to adoption.</i></p> <p>It is assumed that SMR refers to Small Modular Reactors, which is part of the Great British Nuclear proposals. SDC is not promoting this scheme and so cannot comment above what is known publicly. However, it is understood that Great British Nuclear has acquired the Oldbury site and is progressing plans. This forms just one part of the strategic rationale for Central Government to support</p>

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			infrastructure improvements at J14, as set out in EB133b.
		EB133a and EB133b do not confirm funding commitments, likelihood, delivery timescales (Inspectors requirement) and after many months not progressed. Delivery unlikely until post-2041 even if full funding secured.	<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.</p> <p>The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133a. 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>
		23/10/24 Home England state “there’s been no HE involvement in the proposed sites”, therefore no funding in planned.	HE support is not required to bring forward housing developments.



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		<p>Work is not completed, delays were pointless, residents money wasted.</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 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.</p> <p>This shows that a significant level of work has been completed, and that substantial progress has been made in a short period of time.</p>
		<p>Based upon the extent of outstanding work not concluded, I think the Examination should be concluded and the Plan be withdrawn. Slimbridge Parish Council and Wisloe Action Group have</p>	<p>SDC is confident that the level of information provided has fully addressed the Inspector's requirements as outlined in their letter of 5<sup>th</sup> February 2024 and is confident that the</p>

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		undertaken significant technical analysis. I support their consultation responses.	scheme is deliverable and will be suitable to accommodate planned levels of traffic growth.  The withdrawal of the Plan would not remove the need to deliver housing. It would, however, render planning for the strategic infrastructure needs of the District much more challenging. As has been shown by the modelling, M5 Junction 12 and 14 will be overcapacity as a result of background traffic growth, as well as development in the Plan. This issue will not be removed by withdrawal of the Plan.
077	Sarah Davis Sarah Davis Glass	It is clear that action has not been taken to obtain funding for improvements to junction 14 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 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

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			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.
078	Environment Agency	<p>Flood risk and watercourses affect both Junctions 12 and 14. These environmental constraints will need to be carefully considered at the planning application stage.</p> <p>Any improvement works undertaken to the motorway junctions should have due regard to the flood plain and watercourses; they should ensure flood risk is not increased and wherever possible they should aim to reduce existing flood risk. The EA would not envisage there being any insurmountable issues with this, and are satisfied that the policies contained in the relevant Local Plans, along with the policies in the National Planning Policy Framework (NPPF), can adequately ensure works at Junctions 12 and 14 proceed in the correct manner.</p>	The points are noted and would be taken forward through design. It is noted and welcomed that the Environment Agency do not envisage insurmountable issues, and are satisfied with the Policy basis.

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079	Cam Parish Council	The plan will not overcome the capacity constraints on J14	Comment is noted, however, micro-simulation modelling has demonstrated that the proposed design will address existing capacity issues, accommodate background growth, and accommodate development proposed in the SDLP.
		Reports EB133a and EB133b do not identify Government funding, timescales, the likelihood of success or delivery date	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. 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.
		National Highways (NH) state that J14 is at capacity now and would not permit any further significant level of housing development	As has been discussed extensively in the EiP, SDC understands NH's position that no new traffic can be added to J14 without mitigation. Improvements to J14 are therefore being promoted for this reason. The scheme will

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			ensure suitable future operation accounting for both background and planned growth in traffic. The results of microsimulation modelling, as outlined in EB133a, confirm that the improvements for J14 will fully accommodate traffic growth associated with the SDC Local Plan.
		Delivery is unlikely until 2041. Housing development would be post 2041	The reference to the scheme being delivered after 2041 is an incorrect interpretation of EB133a. As discussed above, EB133b (para. 2.2.3) confirms that the enhancements will be needed early in the Local Plan Period.
		The issues and risks with the complex land purchase requirements are not properly explored	Details over any third-party land required to deliver the improvement at J14 have not been provided given the sensitivities involved. However, suitable allowance has been made within the scheme costings for land, along with suitable levels of contingency and optimism bias.
		Contrary to hearing statements it is now clear that Cam allocations will impact the junctions and if, as in EB133b 4.3.15, a super cluster of Wisloe and Cam is considered then even more so as this is	The reference to a “Super Cluster” in EB133b is not considered to be a fully correct interpretation of EB133b. The reference made is in relation to the interrelation between planned growth at Wisloe and Cam in relation

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		considered holistically. The above renders the plan undeliverable and so unsound	to wider Severn Edge proposals, which forms part of the strategic case for securing funding for the J14 improvements. Sites at Wisloe and Cam would be expected to contribute to the funding of the J14 improvements, as outlined in EB133b.
081	Avison Young on behalf of The Tortworth Estate	The Tortworth Estate raises concerns and comments including:  Active travel provision across M5 and at A38 junction are insufficient for current and future active travel demands.	<p>The level of detail provided in relation to the junction design, including the provision for active travel has been at a ‘concept’ level in order to prepare scheme costs and demonstrate that there is a reasonable prospect of a J14 scheme being deliverable. It is therefore not a final scheme.</p> <p>The design for J14 has been consulted on and agreed with NH as the Strategic Highways Authority. SGC as the Local Highway Authority has been involved in discussions and has stated that should the new junction come forwards it 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</p>

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			<p>the M5 and proposed works on the B4509 and its junction with the A38.</p> <p>Further design details, including provision for active travel, will be agreed during the later stages of planning. It is acknowledged that the existing J14 does not provide footways or separate active travel routes and for the purposes of the current design exercise, a like-for-like level of service has been shown.</p>
		Some concerns with the design, cost estimates and Vissim modelling	<p>These concerns have not been shared in order for them to be addressed or responded to. However, SDC consider that 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</p>

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			scheme will be an attractive proposition for central government funding. SDC is in discussion with central government to progress this matter.
		Comprehensive improvement (option 2) will allow for further upgrades should additional growth occur.	The Option 2 improvement is the scheme recommended for implementation at this location. Support from Tortworth Estates is welcomed. It should be noted that the scheme itself can accommodate significant levels of growth as designed, in addition to there being potential upgrades such as the addition of traffic signals, if necessary.
		The proposal is accompanied by a robust funding report to demonstrate deliverability by the public and private sectors.	Support from Tortworth Estates in relation to the strategic funding for the J14 scheme is welcomed.
		No due consideration to the impact on the Tortworth Estate's existing interests as a result of land take, severance and injurious affection on the existing farmhouse	As discussed above, the detail provided in relation to the junction design, including the provision for active travel has been at a 'concept' level in order to prepare scheme costs and demonstrate that there is a reasonable prospect of a J14 scheme being deliverable. More detailed commercial discussions would be undertaken with individual land owners once certainty over the



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			status of the Plan is in place and the scheme is taken forwards.
		Impact on the existing layby which is used for car sharing.	As discussed above, the detail provided in relation to the junction design has been at a 'concept' level in order to prepare scheme costs and demonstrate that there is a reasonable prospect of a J14 scheme being deliverable. The impact on an ad hoc use of an existing layby, or potentially opportunities to formalise activities, would be discussed with the LHA and land owners as necessary in future stages.
		No consideration to the Estate's proposed sustainable transport hub at Junction 14 including park and ride.	The Tortworth Estates proposals are not part of a live planning application or adopted site within SGC's Local Plan. Should a scheme come forward with support of SGC, then SDC would welcome and support any opportunity to provide a holistic scheme between the motorway junction improvement and any development proposals brought forward.
		Seek clarification on proposition that junction 14 capacity could potentially allow 1000 units to come forward without mitigation, and also	It is unclear what is being referred to in this comment as SDC has not stated that 1000 units could come forwards without mitigation.

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		clarification on the discounted mitigation schemes.	<p>Paragraph 1.2.4 of EB133a refers to mitigation schemes which are proposed by others to enable homes to come forwards. It does not refer to housing coming forwards without mitigation,</p> <p>The housing trajectory information in EB135 sets out scenarios for housing which could come forward excluding sites which have an impact at J14. This also considers the potential trajectory in the event that the Sharpness promoter is able to bring forwards an interim scheme to enable capacity for 1,000 homes to be delivered.</p> <p>Sections 2.3 and 2.4 of EB133a discusses the development of alternative mitigation options which have not been taken forwards</p>
		The evidence base makes no reference to engagement with the Estate as key landowner around Junction 14 and no formal position has been agreed to date with regards to demonstrating that the Estate can formerly support the proposed works at this stage.	At this stage, engagement in relation to the J14 improvements have been made in relation to the relevant highway authorities, as required by the Inspectors. It is envisioned that there would be further consultation and engagement with all relevant parties, including commercial discussions with landowners, during the later stages of planning.

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		<p>The Estate has fundamental concerns that SDC is progressing without due consideration to the developments coming forward within South Gloucestershire and vice versa. A coordinated mitigation strategy is fundamental to ensuring developer contributions and a business case for national funding is secured.</p>	<p>Growth from committed developments and cross-boundary growth and SGC have been assessed appropriately within this modelling using the traffic flow outputs from regional strategic modelling. Further information on the strategic modelling is available in EB61 and EB98.</p> <p>The design, modelling and cost of the J14 improvement have been developed in consultation with NH. SGC have been party to these discussions and have positively engaged. SoCG will be submitted on the 5<sup>th</sup> December. SGC supports SDC in bringing forwards its Local Plan, and will be fully engaged in its role as Local Highway Authority. SGC has made clear that its position is that its emerging Local Plan does not require a new junction solution.</p>