national **highways**

20 June 2023

Your ref:

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VIA EMAIL

Dear Charlotte

Stroud District Local Plan EIP: Appendix 2 AC6

You will be aware that I wrote to you on 8 June regarding National Highway's concerns with Appendix 2 AC6 "Note on housing supply which could be delivered before impacts on M5 J12 and J14 would require migration", which was published on the Stroud District Local Plan Review Examination Library, on behalf of Stroud District Council.

National Highways wrote to Stroud District Council on 2 June detailing our concerns. We sought urgent clarification from the council of the purpose of the note and the methodology behind it as we were concerned that the details included had not been evidenced in modelling terms and therefore raised concern to the Strategic Highway Authority.

We were unclear of the evidence behind the document, its purpose and why it was published when we had already agreed to undertake a joint study at M5 Junction 12 to determine 'when' the upgrade would be required.

We consider that the title of the document implies that the quantum of housing discussed could all come forwards prior to any mitigation being delivered on the Strategic Road Network (SRN) such that any reader may infer that mitigation is not required until 2040.

National Highways has clearly stated that additional capacity is required at M5 Junction 14 and that it cannot accommodate any further demands attributed to development allocations without additional capacity (for housing *and* employment sites).

Stroud District Council replied to us on 7 June 2023 and did not satisfactorily respond to our concerns.

Our main concern is that Appendix 2 AC6 was submitted to the EIP and uploaded to the EIP website library without any discussion or communication with National Highways.

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The document makes no reference to National Highways' position at M5 Junction 12 or Junction 14, and does not acknowledge the National Highways study underway at M5 junction 12, which has been agreed with Stroud District Council to determine 'when' an improvement is required.

The title of the document, and without relevant and qualifying text provided, could be interpreted by some that <u>all</u> development listed in the document could be delivered before impacts on M5 J12 and J14 would require mitigation. National Highways has not been presented with any technical evidence from Stroud District Council to support such an inference.

In addition and acknowledging that the note does explicitly reference housing supply, it is our view that evidence should also include consideration of employment uses coming forward.

At present, by excluding employment sites, not stating any assumptions or caveats and without modelling evidence, the note may not provide a realistic nor pragmatic scenario for delivering growth within Stroud district over the plan period.

The final section of the document sub-titled "*Housing supply which could be delivered without sites impacting upon M5 Junctions 12 or 14*" appears to pre-judge the ongoing study of Junction 12 to determine when it would need additional capacity. The scope of the study was agreed with Stroud District Council and the council has provided traffic data and a development delivery profile for use in the study. However, the development delivery profile provided for the Junction 12 study differs to that presented in Appendix 2 AC6.

In summary, we are concerned that Appendix 2 AC6 is misleading and could be interpreted as being accepted by National Highways, which is not the case, without an evidence base and appropriate modelling which has not been provided to support this appendix we are not clear how this conclusion has been drawn. To illustrate the point, we have already been contacted by a developer who has queried details in the note.

We require that the above points are clarified by Stroud District Council to prevent any further confusion.

Yours sincerely

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