



Stroud District Local Plan Review

Summary of Responses to Additional Technical Evidence Consultation

APPENDIX A: EB98 Traffic Forecasting Report Addendum

December 2022

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EB98 Traffic Forecasting Report Addendum

Stakeholders	Summarised comments	Stroud District Council Response
Stagecoach West (20) PS05, PS05a, PS19a, PS20, PS24, PS25, PS30, PS32, PS43, G1, G2, PS33, PS34, PS36, PS37, PS46, PS38, PS47; DCP1, CP2, CP3, CP4, CP8, CP12, EI12, DEI1, EI14, EI16	<ul style="list-style-type: none"> The modelled traffic impacts are anticipated to create significant additional delays. This risks disproportionately undermining the efficiency and relevance of bus services, seriously prejudicing the Sustainable Transport Strategy. 	The TFR and TFR Addendum outlines mitigation scenarios which reduce the residual impacts of SLP development to within acceptable levels. The STS includes measures to improve public transport journey time reliability.
	<ul style="list-style-type: none"> This work continues to expose the lack of capacity headroom across the whole plan area, on local roads and especially on the two SRN junctions at M5 j12 and j14. 	See comment above, which signposts mitigation required to address capacity impacts of the SLP. Mitigation is proposed for M5 J12 and M5 J14.
	<ul style="list-style-type: none"> The work is fundamentally driven by a “predict and provide” approach for traffic generation, with no clear ambition, objectives and outputs sought for public transport, or active travel, or measures to achieve such. 	<p>SDC disagree with this comment and point out that the STS outlines clear ambition, objectives and outputs for how sustainable travel will be delivered through the SLP in terms of specific allocations, but also across modes and along key movement corridors.</p> <p>SDC will welcome provision of transport strategies for all development in accordance with ‘decide and provide’ methodology at the time of future planning submissions where it is based on suitable evidence. This will need to be agreed with the Highways Authorities.</p> <p>The scope of the Transport evidence base, including scenarios for assessment and the TFR, has been developed collaboratively with the Highways Authorities over the period of plan preparation. The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the strategic site allocations, especially in terms of a ‘decide and provide’ approach to sustainable transport.</p>
National Highways (67)	<ul style="list-style-type: none"> National Highways agrees to the need for mitigation and of the scale of respective improvements identified at M5 Junctions 12, 13 and 14. 	Comment noted.



	<ul style="list-style-type: none"> National Highways agreed a draft Statement of Common Ground (SoCG) with Stroud District Council in October 2021 and looks forward to progressing an update to the document. We anticipate that the final SoCG will recognise the need for SDLP policies and delivery plans to provide for and enable improvements to the SRN junctions to support the SDLP development site allocations. This will provide assurance to National Highways that SDC is committed to bringing the necessary infrastructure forward in line with the proposed growth aspirations, and recognises the importance to maintain the safe and effective operation of the SRN, specifically at M5 junctions 12, 13 and 14. 	<p>Comment noted.</p>
	<ul style="list-style-type: none"> National Highways is concerned that at present traffic impact and mitigation analysis is only presented for the end of the SDLP period, i.e. 2040. No evidence has been provided for interim years or to indicate the timing of or triggers for mitigation that would indicate when a respective SRN scheme is required. This evidence should be provided to assure the Inspector that the plan satisfies NPPF paragraph 35 to show that a local plan and its proposed mitigation are justified as part of an appropriate strategy and are effective. If this is not provided, it is requested that the policy is updated to include a statement which sets out that Transport Assessments for the allocated sites will need to identify 'when' the schemes are required. 	<p>A transport working group involving NH, SDC and its transport representatives, GCC and SGC has been established through the preparation of the Local Plan, and has continued to meet post submission. This has included discussing issues such as those raised within this response, with the aim of reaching pragmatic solutions, appropriate to the plan making stage, and recognising significant uncertainty in growth proposals outside of Stroud District.</p> <p>It has not been possible or appropriate at this stage to determine trigger points for infrastructure, due to the uncertainty on the timing of growth external to the SDC area. As such it has not been appropriate to consider producing intermediary year traffic models. This is a common and appropriate approach for the preparation of Local Plans.</p> <p>SDC does not consider any policy changes to be required as national guidance and standard practice for Transport Assessment is to consider the delivery of mitigation / infrastructure requirements, including for SRN junction, and this will be sought for individual sites through future planning applications. The timing of mitigation and contributions is an inherent part of agreeing a Transport Assessment, and subsequent</p>



	<ul style="list-style-type: none"> National Highways is unsighted of and seeks clarity on development assumptions and housing and employment numbers and locations in neighbouring LPA areas, notably South Gloucestershire, Gloucester, Tewkesbury and Cheltenham and used in the SDLP traffic modelling. The location of an allocation, its size and proximity to an SRN junction could have an impact on the size and scale of the improvements required. The withdrawal of the West of England Combined Authority Strategic development Strategy (SDS) adds further uncertainty to traffic modelling development assumptions. This clarification will support the requirements of NPPF paragraph 35 and demonstrate the SDLP mitigations are justified. There is some concern that without clarity on the plans detailed above the assumptions made regarding the SRN may be variable. 	<p>S.106 agreement. Furthermore, through regular engagement with NH, SGC and GCC, all parties have recognised that the submission of the SLP is a point in time and all parties have agreed to work together on the development of specific schemes as details of Development Plans outside of Stroud District come forwards.</p> <p>National Highways has been involved throughout the development of the Traffic Forecasting Report and has agreed the modelling as appropriate for the purpose of assessing the impact of the SLP. The TFR and TFR addendum sets out the methodology for calculating traffic growth. Details of committed schemes from neighbouring authorities is provided in the Uncertainty Log appended to the TFR and TFR Addendum. Wider growth is accounted for through the use of TEMPRO factors, in line with DfT TAG methodology, which NH has agreed is appropriate.</p> <p>NH is correct to note that there remains no certainty as to the position of strategic development in neighbouring authorities, particularly since the withdrawal of the SDS, which is outside of SDC’s control. Therefore SDC has not been able to make specific assumptions on development assumptions outside of the SDC area, and instead has had to rely upon the use of TEMPRO factors. Recognising this uncertainty, all parties have agreed to work together towards final mitigation schemes as details of Development Plans outside of Stroud District come forward.</p> <p>As the SLP is significantly more progressed, SDC is of the view that LPs for neighbouring authorities should be required to consider the impacts from the SLP within own assessments, and further develop the mitigation strategies where there are cross border impacts on this basis. The SLP is explicit about the uncertainty inherent in the assessment at his stage, and it would not be good planning to be delayed until such a stage as other plans are further progressed. The TFDP sets out a reasonable and evidenced calculations to derive the level of funding required from within Stroud District, and that required from neighbouring authorities.</p>
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<p>Gloucestershire County Council (officer-level response) (55)</p> <p>All sites</p>	<ul style="list-style-type: none"> • GCC has engaged on a collaborative basis with SDC, their transport advisors and also with National Highways in working towards an acceptable transport evidence base which sets out likely future transport network needs and identifies possible measures necessary to satisfy those needs. GCC officers are generally satisfied with the updated modelling conclusions, subject to caveats included in the main traffic modelling forecasting report as well as the addendum, i.e. GCC officers are satisfied with the modelling methodology and the need for mitigation. 	<p>Comment noted.</p>
	<ul style="list-style-type: none"> • However, GCC officers recognise and accept that the mitigation schemes proposed represent one of many possible methods to manage the impact on the transport network of the growth proposals included in the Emerging Local Plan and that mitigation measures identified in Transport Assessments supporting individual planning applications may identify other alternative, but equally suitable cost-effective measures. 	<p>Comment noted.</p>
<p>Cllr. Haydn Jones, Stroud District Council (54)</p> <p>PS24, PS25, PS35, PS36, PS37; All policies.</p>	<ul style="list-style-type: none"> • Where is the evidence that 'modal shift' will occur? Any figures used have been created to fit the narrative strategic planners wish to see. There is no evidence. • Massively increased use of public transport is wildly optimistic and misplaced. The pandemic has reduced its use by increased working from and reluctance to enter confined spaces with others. 	<p>The modal shift assessed in the TFR is based on analysis provided in the STS and STS Addendum.</p> <p>The STS documents outline how various sustainable transport schemes are to be delivered for individual site allocations, transport modes and movement corridors will drive mode shift. The STS sets out ambitious mode shift tied to specific infrastructure proposals and are considered to be reasonable. It is recognised that there is limited empirical evidence available as to the level of mode shift that individual schemes can achieve. For that reason, the level of mode shift which is considered feasible has been discussed and agreed with the Transport Working Group.</p>



		Public transport remains crucial to the uptake of sustainable transport across the District, remaining the only viable mode for sustainable transport for much of the area. Promotion of these mode and measures to overcome barriers to update within the STS is essential to meet SDCs carbon reduction and climate emergency agenda.
	<ul style="list-style-type: none"> • Cam railway station can only accommodate two carriages. There is no plan for any increase. Planners seem to attribute infinite capacity in order to meet their preferred site requirements. • Railway route is limited to north/south travel only. • The proposed reinstated railway at Sharpness is a pipe dream. It is not supported and, in practice, will never happen. It is being used by site promoters and strategic planners to try and demonstrate that their site is sustainable. It is not. 	<p>The capacity of existing rail services at Cam and Dursley railway station is a matter for Network Rail and the Train Operating Companies (TOCs) in terms of strategic planning. Consideration for expansion of provision is outside the scope of the SLP process. Possible improvements to service frequency may be available long-term as part of the MetroWest proposals (30min frequency service between Bristol Temple Meads and Gloucester).</p> <p>It is acknowledged that the reopening of the railway line to Sharpness has challenges in terms of delivery, however allocation PS37 is not dependent on this to provide suitable sustainable travel measures. The STS and the SLP policy recognises this uncertainty and requires significant commitment to road based sustainable public transport to meet longer distance sustainable travel requirements, to manage this risk, both in the short term and if the reopening of the line does not materialise in the long term.</p>
	<ul style="list-style-type: none"> • The large housing estates proposed will not internalise travel as promoters try to suggest. Out travel to real places of employment such as Gloucester, Cheltenham, Bristol and Bath by car will increase. 	<p>Internalisation of trips within large mixed-use developments is well evidenced from a number of schemes across the UK. Large scale sites are also able to provide significant investment in transport infrastructure to enable sustainable travel, with less risk to delivery compared to pooled contributions between a number of smaller site.</p> <p>The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. The traffic generation and distribution for the strategic sites have been discussed and agreed with the highways authorities, and are not considered to under-estimate external traffic generation from the Sharpness or other development. The assessment</p>



		has been undertaken on the basis of best practice and industry-standard guidance.
	<ul style="list-style-type: none"> Increasing the A38 to dual carriageway going north will simply speed traffic to the blockage at Slimbridge roundabout then back up. A basic understanding of production engineering says that you must elevate the constraint. In this case Slimbridge roundabout. 	The TFR includes a capacity mitigation scheme at the Slimbridge Roundabout, which is intended to address the specific constraint referenced. The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the strategic site allocations, especially in terms of a 'decide and provide' approach to sustainable transport.
	<ul style="list-style-type: none"> Stroud District Council Strategic Planners have consistently demonstrated abject contempt for residents. This appalling, confused, incomprehensible consultation that does not comply with their Statement of Community Involvement (it is only four weeks not six) is yet another example. 	The 3-4 week consultation was requested by the Inspectors as part of the examination process. All SDC designed consultation during the preparation of the Plan complied with the approved SCI.
South Gloucestershire Council (71)	<ul style="list-style-type: none"> In Summary, South Gloucestershire Council has raised concerns regarding the technical evidence published for consultation on 27th September and which SDC seek to rely on to justify the reasonable prospect that the funding and delivery of their Local Plan spatial strategy can be achieved in a sustainable way. South Gloucestershire Council has put forward recommendations to resolve these matters and would welcome continuing to work with Stroud District Council to resolve these matters through agreeing appropriate modifications which can be secured through a SoCG ahead of examination in public commencing. Subject to this, the matters remain unresolved and points of objection at the current time. 	SDC will continue to work with SGC through a Statement of Common Ground to address issues raised.
Rodborough Parish Council (12)	<ul style="list-style-type: none"> Optimising signal timings and widening the approach on Dudbridge Hill to three lanes will encourage ever-more traffic to use Walkley Hill to 	The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning



	<p>access the single-track section at The Butts and thence to cross the environmentally sensitive Rodborough and Minchinhampton Commons as a rat run to avoid using the designated trunk road (the A419) to travel from the M5 and Stonehouse to Cirencester. It will also make this junction, known as the Golden Cross, yet uglier with ever-more public space covered in tarmac. All of this would be detrimental to the overarching ambition of Stroud District Council to reach carbon neutrality by 2030 and would make this already polluted corridor from Dudbridge Road even more polluted, to the detriment of residents living nearby.</p>	<p>applications for local development sites, especially in terms of a ‘decide and provide’ approach to sustainable transport.</p>
<p>Dursley Town Council (35)</p> <p>PS24, PS25, PS37; DCP1, CP6, CP13, EI12</p>	<ul style="list-style-type: none"> Highways mitigation in the form of a widening A38 approach is welcomed (PS24). The Slimbridge roundabout is Dursley’s main link to A38 and M5 connections. The capacity of this roundabout to cope with increased traffic is important. 	<p>Comment noted.</p>
	<ul style="list-style-type: none"> There is no mention of the A4135 Cam pitch roundabout being already over capacity and any opportunities to mitigate the problem with increased traffic. 	<p>Mitigation of impacts on the A4135 corridor is achieved via the STS, which indicates provision of sustainable transport measures, including bus priority and improved services, along this corridor to reduce dependence on car use.</p> <p>Additionally, SDC will require the planning application(s) for any SLP site allocations or any other development within the District to consider the mitigation requirements local to the site.</p>
	<ul style="list-style-type: none"> Traffic lights would have an unacceptable adverse impact on the flow of traffic travelling in and out of Dursley. Council strongly opposed proposals to install traffic lights at locations, including: <ul style="list-style-type: none"> A4135 Draycott, Cam A4135 -over Bristol mainline railway bridge (S.14/2612/DISCON). 	<p>SDC note that traffic light improvements have not been suggested as mitigation on any highways in Cam / Dursley area and so it is not clear what Dursley Town Council is objecting to in this comment.</p> <p>SDC does not agree that the installation of signal-control on the network would have an unacceptable adverse impact, however effects of any future proposals would need to be demonstrated as appropriate</p>



	<ul style="list-style-type: none"> - Proposed lights - Sandpits/Tiltdown/Dursley Road junction (S.15/2804/OUT the Stroud Local Plan Capacity Assessment, public meeting 27/09/16) 	<p>mitigation for the network as a whole, including in terms of sustainable modes, as part of any future planning application(s).</p>
	<ul style="list-style-type: none"> • There is no evidence that traffic lights improve the flow of traffic. Use of traffic lights has resulted in long queues, congestion and delays which has an adverse impact on the environment and emissions. Council campaigned to successfully remove traffic lights at the Castle Street/May Lane junction in favour of the existing mini roundabout, dramatically improving traffic flow. • Council considers roundabouts to be a suitable, sustainable alternative measure, in terms of traffic flow, maintenance, the environment and air quality, to signalised junctions. • This view is held for highway junction improvement measures and motorway junctions mentioned for signalisation. 	<p>See comment above. The appropriate form of mitigation will depend on the particular location, and the level and pattern of traffic flows, as well as pedestrian and cycle desire lines and safety needs.</p>
<p>Slimbridge Parish Council (37)</p> <p>PS37</p>	<ul style="list-style-type: none"> • The increase in housing numbers and road journeys (+30%) should generate a strengthening of highway mitigation measures but none have been recommended. The twin lane ‘mitigation’ proposal for the A38 northbound approach to the A4135 roundabout will not materially improve traffic flows as this is already two lanes. Volume over capacity junction improvements from 105 to less than 64 are wholly unjustified and unrealistic. The TFRA therefore significantly underestimates the traffic impacts at the roundabout which will remain over capacity. Additional housing numbers at Draycott (Cam) will further pressurise the roundabout’s capacity. 	<p>SDC disagree that no mitigation measures have been proposed in relation to site allocation PS37 as various measured are outlined in the TFR and STS and the associated Addendums.</p> <p>The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the site allocation at Wisloe (PS37), especially in terms of a ‘decide and provide’ approach to sustainable transport.</p> <p>The IDP states that “widening” could be considered for the A38 northbound lanes, which could be more than two lanes if highway capacity enhancements were sought to mitigate effects of future year traffic demand.</p>



		The strategic modelling assessment has been undertaken in accordance with best practice and industry-standard guidance, and agreed with GCC and NH. There is no evidence to suggest that the traffic flows / results are inaccurate or that the improvements /mitigation assessed, would not be able resolve the traffic effects of the SLP. The modelling results presented in these reports are robust and accepted by GCC as the relevant highway authority.
	<ul style="list-style-type: none"> The Slimbridge and northern Cam settlements have low levels of local employment, poor public transport and high levels of commuting (via the A4135 and A38), they are predominantly dormitory areas. The typical profile of young families moving into new housing estates will only serve to increase this out commuting, not reduce it. All local schools are also beyond capacity leading to additional car journeys, further exacerbating the situation. These impacts at rush hour have not been modelled. 	<p>It is not necessary or appropriate to consider highly specific and speculative characteristics of particular site allocations within the assessment of SLP traffic effects. A consistent set of parameters based on location and content of the allocation have been applied to all SLP allocations as appropriate, as is standard practice at plan-making stage for the purpose of identifying strategic impacts and mitigation. Specific impacts, reflective of local characteristics and details of schemes as they come forwards, will be demonstrated and mitigated through future planning applications.</p> <p>School capacities are addressed through the IDP and IDP Addendum EB110.</p>
	<ul style="list-style-type: none"> The modal shift improvements estimated in the report from using public transport and the footbridge etc for PS37 are wholly unjustified and considered overly optimistic. 	<p>This comment is in relation to the STS; however a response has been provided here for ease of reference.</p> <p>The STS Addendum assumes a 15% reduction in car mode share, for journeys which could be undertaken by rail, as a result of a pedestrian / cycle connection to Cam and Dursley Station. This was previously a 10% reduction in the STS, however the increase in 5% is still within the 20% reduction targeted for the development to meet SDC’s carbon reduction and climate emergency targets. It is recognised that there is limited empirical evidence available as to the level of mode shift that individual schemes can achieve. For that reason, the level of mode shift which is considered feasible has been discussed and agreed with the Transport Working Group.</p>
Cam Parish Council (57)	<ul style="list-style-type: none"> The forecasting report estimations are considered too low as the baseline numbers are not supported. 	The strategic modelling assessment has been undertaken in accordance with best practice and industry-standard guidance, and



PS24, PS25,		agreed with GCC and NH. There is no evidence to suggest that the traffic flows / results are inaccurate or that the improvements /mitigation assessed, would not be able resolve the traffic effects of the SLP. The modelling results presented in these reports are robust and accepted by GCC as the relevant highway authority.
	<ul style="list-style-type: none"> The roundabout at the bottom of Cam Pitch (High Street A4135) is already at capacity and is not mentioned throughout any documentation. It is essential that the full road network is assessed for capacity and mitigated as required without omitting major junctions. 	<p>Mitigation of impacts on the A4135 corridor is achieved via the STS, which indicates provision of sustainable transport measures, including bus priority and improved services, along this corridor to reduce dependence on car use.</p> <p>Additionally, SDC will require the planning application(s) for any SLP site allocations or any other development within the District to consider the mitigation requirements local to the site.</p>
Brookthorpe with Whaddon Parish Council (68) G2	<ul style="list-style-type: none"> The Addendum contains one major revision from the original, being the significantly increased traffic at Javelin Park caused by the increase of the size of the potential development. There are no amendments to the mitigation measures at the Whaddon site, principally being road widening at Epney Road and St. Barnabas junctions. No additional mitigation has been provided. 	It is confirmed that no revisions to the mitigation are proposed for allocation G2 in the TFR Addendum. The TFR and TFR Addendum demonstrate that sufficient highway mitigation can be delivered to reduce the impacts of this site.
	<ul style="list-style-type: none"> The Parish Council have consulted GCC to establish what they would consider to be a possible highways solution, particularly regard to St. Barnabas which is currently at capacity. Officer views are that whilst there may be theoretical capacity solutions at the St. Barnabas roundabout, these would fail to accord with the objectives of the National Planning Policy Framework, in particular paragraph 11, as a means of mitigation for the Whaddon site. GCC would not adopt a predict and provide approach to road widening the approaches to the roundabout which is likely to involve the acquisition of third-party land by compulsory purchase. 	<p>The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC is aware of, and supports, the approach to mitigation as discussed within the comments. SDC will require the Transport Assessment for site allocation G2 to explore all possibilities for mitigation at this junction as part of any future planning application(s). It is understood that GCC and the site promoter are exploring options which enhance safety and facilities for sustainable modes as appropriate mitigation. This is included within the STS and STS Addendum.</p> <p>Pedestrian / cycle connections to railway services are a key element of the sustainable travel strategy for the G2 allocation, as outlined in the</p>



	<ul style="list-style-type: none"> GCC's preference for mitigating the impact of development of the Whaddon site would be by internalising traffic/movement through walkable neighbourhoods, early provision of local services and dealing with the severance of the railway line which prevents improved access to the communities to the West. GCC officers have stressed that it is critical that new walking, cycling and public transport access routes either by bridge or tunnel must be created to overcome the extremely poor access to local services. Without those links it will be extremely difficult to create a settlement without unacceptable additional traffic on the existing road network around the site and St. Barnabas roundabout. 	STS and STS Addendum. SDC considers that this will enable significant shift to rail modes for future users of the site.
Stroud Path Rights Project (21) All sites	<ul style="list-style-type: none"> Sustainable Transport policy should include reference to provision of multiuser routes 	Comment noted.
Wisloe Action Group (32) PS37	<ul style="list-style-type: none"> The increase in housing numbers and road journeys (+30%) should generate a strengthening of highway mitigation measures but none have been recommended. The twin lane 'mitigation' proposal for the A38 northbound approach to the A4135 roundabout will not materially improve traffic flows as this is already two lanes. Volume over capacity junction improvements from 105 to less than 64 are wholly unjustified and unrealistic. The TFRA therefore significantly underestimates the traffic impacts at the roundabout which will remain over capacity. Additional housing numbers at Draycott (Cam) will further pressurise the roundabout's capacity. 	<p>SDC disagree that no mitigation measures have been proposed in relation to site allocation PS37 as various measured are outlined in the TFR and STS and the associated Addendums.</p> <p>The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the site allocation at Wisloe (PS37), especially in terms of a 'decide and provide' approach to sustainable transport.</p> <p>The IDP states that "widening" could be considered for the A38 northbound lanes, which could be more than two lanes if highway capacity enhancements were sought to mitigate effects of future year traffic demand.</p> <p>The strategic modelling assessment has been undertaken in accordance with best practice and industry-standard guidance, and</p>



		agreed with GCC and NH. There is no evidence to suggest that the traffic flows / results are inaccurate or that the improvements/mitigation assessed, would not be able resolve the traffic effects of the SLP. The modelling results presented in these reports are robust and accepted by GCC as the relevant highway authority.
	<ul style="list-style-type: none"> The Slimbridge and northern Cam settlements have low levels of local employment, poor public transport and high levels of commuting (via the A4135 and A38), they are predominantly dormitory areas. The typical profile of young families moving into new housing estates will only serve to increase this out commuting, not reduce it. All local schools are also beyond capacity leading to additional car journeys, further exacerbating the situation. These impacts at rush hour have not been modelled. 	<p>It is not necessary or appropriate to consider highly specific and speculative characteristics of particular site allocations within the assessment of SLP traffic effects. A consistent set of parameters based on location and content of the allocation have been applied to all SLP allocations as appropriate, as is standard practice at plan-making stage for the purpose of identifying strategic impacts and mitigation. Specific impacts, reflective of local characteristics and details of schemes as they come forwards, will be demonstrated and mitigated through future planning applications.</p> <p>School capacities are addressed through the IDP and IDP Addendum EB110.</p>
	<ul style="list-style-type: none"> The modal shift improvements estimated in the report from using public transport and the footbridge etc for PS37 are wholly unjustified and considered overly optimistic. 	<p>This comment is in relation to the STS; however a response has been provided here for ease of reference.</p> <p>The STS Addendum assumes a 15% reduction in car mode share, for journeys which could be undertaken by rail, as a result of a pedestrian / cycle connection to Cam and Dursley Station. This was previously a 10% reduction in the STS, however the increase in 5% is still within the 20% reduction targeted for the development to meet SDC's carbon reduction and climate emergency targets. It is recognised that there is limited empirical evidence available as to the level of mode shift that individual schemes can achieve. For that reason, the level of mode shift which is considered feasible has been discussed and agreed with the Transport Working Group.</p>
Tritax Symmetry Limited (38)	<ul style="list-style-type: none"> Tritax Symmetry (Gloucester) Ltd accept that they should make a reasonable and fair contribution to 	The level of contributions to the B4008 scheme (part of the M5 J12 Package) is outlined in the TFDP. The requirement for sites not outlined



PS43	<p>infrastructure works to mitigate the impact of their proposal.</p> <ul style="list-style-type: none"> All allocations should be expected to contribute to infrastructure costs including any works to the B4008. 	<p>in the TFDP to contribute to this scheme will be determined through the planning application process.</p>
	<ul style="list-style-type: none"> The proposal is for up to 105,000 sqm of Storage and Distribution (B8). Traffic movements from the proposed scheme are around 12.5% of that forecast for the B1/B2/B8 allocation. 	<p>Comment noted.</p>
	<ul style="list-style-type: none"> Based on the evidence documents submitted a contribution to the M5 Junction 12 Mitigation package of circa £145,000 is considered reasonable to past the tests for S106 payments. The significant reduction in trips from the application proposal negates the need for the dualling of the B4008 when the new grade-separated Junction 12 and signalised approach lanes (and signal optimisation) is completed. 	<p>It is noted that the development proposals differ from the allocation that has been assessed, and that this results in a significant reduction in traffic generation. It is understood that a planning application has been brought forwards setting this out, with the traffic generation and impacts agreed with GCC and NH. As set out throughout this response, the TFR is a strategic level assessment to determine the strategic mitigation needs of the SLP as a whole. It is expected that planning applications and associated Transport Assessments will assess the specific details of development proposals as they come forwards. It is agreed that the mitigation proposed should be proportional to the level of impact assessed by the planning application, and that it should be agreed and secured by the relevant highways and planning authorities at that stage.</p>
<p>Carney Sweeney on behalf of Redrow Homes Ltd (46)</p> <p>G1; CP6, CP13, EI12</p>	<ul style="list-style-type: none"> The updated traffic modelling reflecting the revised allocations has not accounted for the additional interventions set out in the STS Addendum. More detail of the more major mitigation schemes, notably at M5 J12 & J14 is required as the delivery of these will be key in delivering Local Plan growth. The updated modelling has shown that the additional development at Javelin Park will put further pressure on the operation of the highway network at M5 J12 for which further mitigation is 	<p>It has not been considered necessary to update the modelling to account for the updated STS changes, as the level of mitigation required to address SLP impacts has been demonstrated in the TFR and it is considered that this can be delivered to mitigate impacts as required. This has been agreed with the highways authorities through the Transport Working Group.</p> <p>Additional mitigation for the B4008 has been outlined within the TFR Addendum to account for the increased size of development allocated at PS43.</p>



	<p>likely. The required highways mitigation works required at M5 J12 and the M5 as a whole represent a strategic network issue and cannot be solely the responsibility of Stroud District Council or its Local Plan's Strategic allocations to 'fix'. The mechanisms to deliver the strategic infrastructure (whether this be through CIL, S106, neighbouring LPA's or other funding sources) should be clarified and explicitly set out in the Local Plan and IDP so as not to cause any unnecessary delays to the delivery trajectory of the strategic sites.</p>	<p>SDC agrees that the required highways mitigation works on the M5 are a strategic network issue and cannot be solely the responsibility of SDC or its LP Strategic Allocations to address. The funding and delivery strategy of M5 junction improvement packages is set out in the TFDP which explains this issue, and the required collaborative approach to mitigation identification and delivery across a range of parties including neighbouring authorities.</p>
	<ul style="list-style-type: none"> The traffic modelling is very strategic and more detailed analysis will therefore be required to inform the TAs of individual sites. 	<p>Comment noted and agreed. This is standard practice for a Local Plan, and is explicitly recognised by SDC and the highways authorities.</p>
<p>Origin 3 for Newland Homes (47)</p> <p>PS45</p>	<ul style="list-style-type: none"> Table A.1 within EB98 forecasts trips generated by Local Plan developments. The forecasted trip generation for selected site allocation PS45 (10 dwellings at Land West of Upton's Gardens) appears justified and aligns with the suggested trip generation forecast for 11 dwellings as set out in the accompanying Transport Note prepared by cTc Consulting for application for planning permission S.21/2010. The number of trips forecast for each peak hour are extremely low. It is clear that there will be no material impact resultant from the selected site allocation PS45. 	<p>Comment noted.</p>
	<ul style="list-style-type: none"> The live planning application (S.21/2010) for PS45 seeks planning permission for 11 dwellings (low density development of the site is achievable with a development of 11 rather than 10 dwellings, whilst taking into account the adjacent Listed Building). The Highways consultee comments made in respect of the application recommend approval subject to condition. 	<p>Comment noted.</p>



<p>Minchinhampton Local Plan Response Group (48)</p> <p>PS05, PS05a</p>	<ul style="list-style-type: none"> The peak times traffic figures are flawed, based as they are on incorrect assumptions on realistic available primary school places. 	<p>School capacities are addressed through the IDP and IDP Addendum EB110 and are worked out by GCC Education department.</p>
<p>Blue Fox Planning Ltd on behalf of Persimmon Homes (Severn Valley) Ltd (53)</p> <p>PS24</p>	<ul style="list-style-type: none"> The assessment presented within EB98 includes an allowance for 900 dwellings at Cam North West (PS24). Whilst this accords with the draft policy, there is no reference or acknowledgement of the current live application with the LPA, for 1,030 dwellings. 	<p>The TFR and TFR Addendum has assessed the policy allocation for PS24, as is required and appropriate to assess the impact of the SLP at strategic level. Specific planning applications will be assessed on their own merit via a Transport Assessment for the site. Due to the timescales required to prepare a Local Plan, there will be instances where planning applications come forwards alongside and in advance. For consistency, it is necessary to assess each allocation on the basis of the proposed allocation.</p>
	<ul style="list-style-type: none"> EB98 does not outline whether any adjustments have been made to take account of the impacts of Covid 19 on travel patterns which has resulted in more home working that has reduced commuting trips in the long term. 	<p>The TFR and TFR Addendum have not considered the uncertain effects of Covid-19 on travel patterns, particularly as they are unknown and more complex than simply an increase in home working in some sectors of the economy. The Traffic Modelling has necessarily been prepared in line with DfT TAG guidance, which does not include a mechanism to take account of potential long term changes as a result of Covid-19. The strategic modelling assessment methodology has been agreed with GCC and NH.</p>
	<ul style="list-style-type: none"> One mitigation scenario that is missing from the assessment would be a scenario that includes the Sustainable Transport Strategy but excludes Preferred Highway Mitigation (i.e. 2040 Local Plan with Sustainable Transport Strategy). The inclusion of this scenario is important on the basis that Sustainable Transport improvements may serve to reduce the requirement for highway infrastructure. 	<p>SDC do not consider the provision of this scenario to be necessary to demonstrate that the SLP is acceptable. The assessment scenarios considered in the TFR and TFR addendum were as requested and agreed with the relevant Highway Authorities to ensure that the analysis provided the necessary evidence to demonstrate that the SLP is acceptable.</p>
<p>Pegasus group on behalf of Robert Hitchins (73)</p>	<ul style="list-style-type: none"> The updated traffic modelling reflecting the revised allocations has not accounted for the additional interventions set out in the STS Addendum; 	<p>It has not been considered necessary to update the modelling to account for the updated STS changes, as the level of mitigation required to address SLP impacts has been demonstrated in the TFR and it is considered that this can be delivered to mitigate impacts as</p>



PS19a	<ul style="list-style-type: none"> the identified highway mitigation needs to have more scrutiny as a number of the schemes don't appear to be necessary based on the modelling results. It would be beneficial to have more detail of the more major mitigation schemes, notably at M5 J12 & M5 J14, as the delivery of these will be key in delivering Local Plan growth. The updated modelling has shown that the additional development at Javelin Park will put further pressure on the operation of the highway network at M5 J12 for which further mitigation is likely. 	<p>required. This has been agreed with the highways authorities through the Transport Working Group.</p> <p>The funding and delivery strategy of M5 junction improvement packages is set out in the TFDP which confirms that the PS43 will be required to contribute to improvements at M5 J12.</p> <p>Additional mitigation for the B4008 has been considered in relation to the increased size of development allocated at PS43, and the detailed requirement for mitigation for this will be determined through the planning application for this site.</p>
	<ul style="list-style-type: none"> The updated traffic modelling continues to underestimate the traffic impacts on the wider highway network from the proposed allocation at Sharpness, and only assesses 2,400 dwellings as opposed to the total number planned of 5,000 dwellings. Further mitigation to that identified in the 'Preferred Highway Mitigation Strategy' would likely be required should the development traffic reductions assumed for sustainable travel from the site not be realised, or the additional housing comprising the total allocation for the site as a whole. It highlights the existing capacity constraints at the two motorway junctions at M5 J12 & M5 J14 and junctions along the A38 corridor, for which significant new infrastructure will be needed to accommodate the planned growth in the Local Plan. 	<p>The TFR and TFR Addendum has assessed 2,400 dwellings as per the allocation in the SLP. This is an appropriate to assess the impacts and viability of the current SLP. The impact of a wider or future development at this location is outside the scope of the current assessment.</p> <p>The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. The traffic generation and distribution for the strategic sites have been discussed and agreed with the highways authorities, and are not considered to under-estimate external traffic generation from the Sharpness development. The assessment has been undertaken on the basis of best practice and industry-standard guidance.</p> <p>The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the Northwest of Stonehouse site, especially in terms of a 'decide and provide' approach to sustainable transport.</p>



<p>Ridge on behalf of Ecotricity (76)</p>	<ul style="list-style-type: none"> In summary, Ecotricity as a green energy provider and sustainable business fully support Stroud District Council's 2030 Strategy and Masterplan in response to the climate and ecological emergency with the goal of being carbon neutral by 2030 and Gloucestershire County Council's Gloucestershire Climate Change Strategy (2022-2027). National Policy also supports Net Zero as set out in the Net Zero Strategy to meet net Zero emissions by 2050. Therefore, concern is raised regarding the potential double counting of background traffic growth and over provision of highway capacity on the basis that it does not align with a reduction in carbon emissions. 	<p>It is not clear what specific concerns Ridge / Ecotricity have in relation to the assessment methodology, however SDC reiterate that the strategic modelling assessment has been undertaken in accordance with best practice and industry-standard guidance, and agreed with GCC and NH. There is no evidence to suggest that the traffic flows / results are inaccurate. The modelling results presented in these reports are robust and accepted by GCC as the relevant highway authority.</p> <p>The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications, especially in terms of a 'decide and provide' approach to sustainable transport planning to meet SDC's carbon reduction and climate emergency agenda.</p>
<p>Lichfields on behalf of CEG and the Charfield Land Owners Consortium (78)</p>	<ul style="list-style-type: none"> The TFRA (EB98) identifies an approximately 5-minute delay on the M5 Junction 14 and approaches with the inclusion of SDC growth (with no mitigation). However, the IDP references a 20% impact only; with the remainder coming from other local authorities. There is no clarity on how impact has been defined and whether the approach adopted is reasonable for example would a 20% impact relate to a 5+ minute delay. It is not clear whether SGC have agreed to the modelling assumptions used, as well as the impact of SDLPR allocations compared with potential growth from other boroughs (listed as a 20% / 80% split). SDC need to use the NH's VISSIM model for M5 J14 to consider the cumulative impacts and funding 	<p>The methodology used to derive the level of impact arising from the SLP at M5 J14 is outlined in the TFDP. The methodology is considered to be suitable for the purposes of demonstrating the viability of the SLP given the level of uncertainty in relation to future growth in neighbouring authority areas.</p> <p>A transport working group involving NH, SDC and its transport representatives, GCC and SGC has been established through the preparation of the Local Plan, and has continued to meet post submission. SDC will continue to work with SGC through a Statement of Common Ground to address issues raised in relation to the TFDP.</p> <p>SGC will set out their own position on the matter. However, at this stage SGC has advised SDC that the SGCLP is not at an appropriate stage to assume or assess specific levels of development in specific locations. SDC has therefore used an appropriate and WEBTAG compliant methodology for accounting for traffic growth levels outside of the District.</p> <p>The assessment of the M5 J14 improvements using National Highway's VISSIM model has not been possible as the model has not been</p>



	<p>model. The model has been available for a number of years and has recently been updated to ensure that the most up to date information is used to assist the Inspectors' assessment. SDC are aware of this model and assessment and at the very least there needs to be a further update to the submitted evidence base to consider the implications of the new model on the finding of SDLPR and the proposed mitigation/costs at M5 J14.</p>	<p>available for such purposes within the timeframe of the assessment. Additionally, the proposed form of mitigation has not been developed to the point where accurate modelling using micro-simulation could be provided. There also remains high levels of uncertainty in relation to strategic development in neighbouring authorities and it has not been possible to determine this within the timeframe of preparing the SLP.</p> <p>It is envisioned that more detailed modelling of the M5 J14 improvements will be undertaken using VISSIM (as per National Highway's requirements) through further partnership working in bringing forwards the specific mitigation scheme, and the promotion of various site allocations through the planning process.</p>
	<ul style="list-style-type: none"> • There is no evidence provided regarding the 20% impact from SDC compared with 80% from other authorities and the IDP (EB110) appears to confirm that there is little certainty as to details, nature and location of strategic development to the north and south of the district. To assist the Inspectors and other stakeholders, SDC should provide the calculations behind the 20%/80% split. 	<p>See comment above. The calculations used to determine the funding split have been provided to the highways authorities and no comments have been received.</p>
<p>Nexus Planning on behalf of Crest Nicholson (82) PS30</p>	<ul style="list-style-type: none"> • Appropriate, subject to the caveat in the second bullet below, that predicted trip rates and trip distributions are used to identify the likely impact on the highway network and to apportion the costs of the required mitigation measures between the proposed allocations. However, the TFRA overestimates both the trip rates and the impact of non-work trips on the highway network. In addition, the assessment makes no allowance for the internalisation and containment of trips within the Hunts Grove Extension. These assumptions need to be reviewed to ensure that the evidence underpinning both the Transport Funding and 	<p>A consistent set of assumptions have been applied to all SLP allocations. This has included a consistent approach to internalisation, and has been agreed with the highways authorities through the transport working groups. This is appropriate to identify the strategic mitigation requirements of a Local Plan.</p> <p>Planning applications for the sites which come forward will need to assess the specific details of individual development proposals, and be agreed with the relevant highways authorities.</p>



	Delivery Plan and the Infrastructure Delivery Plan is robust.	
Individuals	Summarised comments	Stroud District Council Response
Individual (1) G1	<ul style="list-style-type: none"> The traffic plan identified for Cole Avenue, Epney Road and St Barnabas Roundabout needs to be implemented ahead of any build / increase in traffic levels 	Comment noted. Timescales for implementation will be established through the planning application process.
Individual (2) PS24, PS25, PS33, BER016/17, PS36, PS37	<ul style="list-style-type: none"> In a word - no. The combined impact of all the local development sites on roads which are already struggling will cause gridlock and make it unsafe for other users. 	Comment noted. SDC has a duty to provide necessary housing and other growth in the District up to 2040 in accordance with UK Government targets. The submitted documents outline how the impacts arising from SLP allocations can be successfully mitigated.
Individual (6) PS36	<ul style="list-style-type: none"> Predicted PM arrivals and AM departures for PS36 are given at approximately 960. It is my understanding that 2400 houses are planned at PS36 by 2040, (5000 by 2050). Given 2400 new households initially, I find the 960 figure implausible. Could you clearly justify this number? Can you demonstrate that such a project has been carried out before in a similarly remote area, without previously existing public transport links or local employment opportunities, and resulted in a similar percentage of trips, and detail how you will replicate this existing track record? My previous comments concerning the criticism of public transport plans for PS36 by Stagecoach and Network Rail still stand. Please clarify whether the rural and industrial nature of traffic is modelled - it would be unusual for me not to encounter a tractor (and multiple lorries) on my commutes. Is this reflected? I would like to see a worst case scenario of trips considered for PS36 - if every non-retired adult in PS36 were to drive by car for at least part of their 	<p>It is not necessary or appropriate to consider highly specific and speculative characteristics of particular site allocations within the assessment of SLP traffic effects. A consistent set of parameters based on location and content of the allocation have been applied to all SLP allocations as appropriate, as is standard practice at plan-making stage for the purpose of identifying strategic impacts and mitigation. Specific impacts, reflective of local characteristics and details of schemes as they come forwards, will be demonstrated and mitigated through future planning applications.</p> <p>The strategic modelling assessment has been undertaken in accordance with best practice and industry-standard guidance, and agreed with GCC and NH. There is no evidence to suggest that the traffic flows / results are inaccurate or that the improvements /mitigation assessed, would not be able resolve the traffic effects of the SLP. The modelling results presented in these reports are robust and accepted by GCC as the relevant highway authority.</p> <p>More detailed assessment of the site allocation will be required as part of any future planning application process, which will provide further detail in relation to the expected trip generation and impact on the local highway network.</p>



	<p>commute, what would be the effect on traffic. Good planning can hope for the best but it must realistically consider and plan for the worst. This is not flippant - given the current lack of major local employers, those who choose to settle here are likely to do so because it is a midpoint between two major hubs of employment: Cheltenham/Gloucester and Bristol. This is something couples with existing employment each in a different direction would do.</p>	
<p>Individual (8) G2</p>	<ul style="list-style-type: none"> I believe that the documented evidence backs up my comments made regarding the increase in traffic which will impact not only the residents of Tuffley but those attending St Peter's School and those using St Barnabas Roundabout coming from all directions. There is no space to add lanes on either of the Stroud road sides of the roundabout. It's already a challenge trying to come out of Reservoir road and this will, without doubt, get worst. Your documents but not show how the conclusion was reached and is written in terms making it impossible to understand by the layman, i.e. those that will be impacted by this plan. 	<p>SDC will require the Transport Assessment for site allocation G2 to explore all possibilities for mitigation at this junction as part of any future planning application(s). It is understood that GCC and the site promoter are exploring options which enhance safety and facilities for sustainable modes as appropriate mitigation. This is included within the STS.</p> <p>The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the Land at Whaddon site, especially in terms of a 'decide and provide' approach to sustainable transport.</p>
<p>Individual (10) PS24, PS27; CP3, CP6, DHC5, EI8, EI13, EI14, ES4, ES6</p>	<ul style="list-style-type: none"> Pedestrian safety and traffic calming measures are needed I have real concerns about the speed and excessive volume of traffic along High Street, Cam and Long Street, Dursley. There has been a number of accidents in the last decade and pedestrian near misses. Plus a vehicle smashing into a house front on High Street, making it un habitable 	<p>The STS and STS Addendum propose sustainable transport measures along the A4135 corridor. Each development site as it comes forward will be required to produce a Transport Assessment, including assessing road safety and local mitigation measures.</p>
<p>Individual (14) PS37</p>	<ul style="list-style-type: none"> The proposed mitigation at the A38 / A4185 roundabout by extending the two lane northbound 	<p>The highway mitigation proposed have been assessed using models agreed to be appropriate by the highways authorities. This is set out in the TFR and TFR Addendum.</p>



	<p>approach section will do very little to alleviate the congestion.</p> <ul style="list-style-type: none"> The modal shift improvements to reduce car usage are pure guesswork and no evidence is given to support the estimates. 	<p>The modal shift assessed in the TFR is based on analysis provided in the STS and STS Addendum.</p> <p>The STS documents outline how various sustainable transport schemes are to be delivered for individual site allocations, transport modes and movement corridors will drive mode shift. The STS sets out ambitious mode shift tied to specific infrastructure proposals and are considered to be reasonable. It is recognised that there is limited empirical evidence available as to the level of mode shift that individual schemes can achieve. For that reason, the level of mode shift which is considered feasible has been discussed and agreed with the Transport Working Group.</p>
Individual (15) PS37	<ul style="list-style-type: none"> Simply put the original weaknesses in the TFR are still valid. The bottom line is that more houses will create more commuters in a rural area with such poor local transport and that can only exacerbate congestion on the highways that are already running and exceeding capacity at peak times of network use. 	<p>SDC has a duty to provide necessary housing and other growth in the District up to 2040 in accordance with UK Government targets. The submitted documents outline how the impacts arising from SLP allocations can be successfully mitigated.</p>
Individual (16) PS33, BER016/17, PS34, PS35, PS36	<ul style="list-style-type: none"> While acknowledging the planned traffic light plans, this does not mitigate the total of 2281 additional AM journeys and 2149 additional PM journeys across these sites (based on the figures in the plan - not including the additional HGVs from the new warehousing at Sharpness). Alkington lane is very narrow and already subject to a high volume of traffic. Subjecting this additional volume of traffic to the narrow, bendy road alongside the only slightly more suitable B4066 is not a realistic long term solution. I have a young family that will be subjected to the increase in traffic fumes and traffic noise, not to mention making it even less safe to leave the 	<p>The scope of the Transport evidence base, including scenarios for assessment and the TFR, has been developed collaboratively with the Highways Authorities over the period of plan preparation. The highway mitigations shown in the TFR and TFR Addendum are just one way in which mitigation could come forward, including in relation to improvements on the A38 Corridor. SDC will welcome alternative proposals for mitigation through future planning applications in the local area, especially in relation to a 'decide and provide' approach to sustainable transport. This will be demonstrated through future planning application for the SLP allocations.</p>



	<p>house due to the lack of pavement on the road. This is nearly impossible as it is due to the high speeds vehicles travel at along the road. My ask is for a fit for purpose, long term solution that allows traffic to flow in and out of the existing properties, new properties, and industrial sites. This should involve a continuation of the bypass, or similar such solution, that allows the high volume of traffic to flow on roads wide and direct enough to safely direct traffic to the A38 or even better straight to the M5.</p>	
<p>Individual (17)</p> <p>All sites; PS24, PS25; DCP1, CP6, EI12, EI13, EI16, CP15, ES5</p>	<ul style="list-style-type: none"> Without a clear starting position and recognition that already promised improvements have not been delivered, the soundness of the Traffic forecasting cannot be judged. 	<p>The modelling set out in the TFR is validated based on existing conditions, i.e. without accounting for schemes which are yet to be delivered. The future year baseline (Do Minimum) includes those schemes which have sufficient certainty to be considered to be committed, in line with DfT TAG guidance. This provides both a clear starting position and recognition that some proposed improvements have not yet been delivered. The strategic modelling assessment has been undertaken in accordance with best practice and industry-standard guidance as agreed with GCC and NH.</p>
<p>Individual (19)</p>	<ul style="list-style-type: none"> The forecasting is flawed. Public transport is poor and the train services are at capacity. It is unlikely that the Cam and Dursley station and car parking can be increased without significant cost. The schools are at capacity and there is little local employment so the new estates will increase commuting and driving to take children to school. The A4135 will have a much greater increase in traffic and the plans for the roundabout at the junction with the A38 will not be sufficient to deal with the traffic issues that will result. 	<p>The strategic modelling assessment has been undertaken in accordance with best practice and industry-standard guidance, and agreed with GCC and NH. There is no evidence to suggest that the traffic flows / results are inaccurate or that the improvements /mitigation assessed, would not be able resolve the traffic effects of the SLP. The modelling results presented in these reports are robust and accepted by GCC as the relevant highway authority. The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. The traffic generation and distribution for the strategic sites have been discussed and agreed with the highways authorities, and are not considered to under-estimate external traffic generation from local developments/allocations.</p>



		The highway mitigations shown in the TFR and TFR Addendum are just one way in which mitigation could come forward, including in relation to improvements on the A38 Corridor. SDC will welcome alternative proposals for mitigation through future planning applications, especially in relation to a 'decide and provide' approach to sustainable transport. This will be demonstrated through future planning application for the SLP allocations, which will also be required to demonstrate suitable viability.
Individual (22) All sites; PS25	<ul style="list-style-type: none"> In the past few years, over which the site allocations have been developed, a significant level of development has taken place, has been given planning permission or is pending planning permission in Cam. 	The assessment has been undertaken on the basis of best practice and industry-standard guidance, including in relation to forecasted growth in travel behaviour and demographic patterns up to 2040. The growth has accounted for committed developments granted permission across the district, as outlined in the Uncertainty Log.
	<ul style="list-style-type: none"> The 2021 DRAFT local plan site allocations document identified a need for 900 dwellings in the Cam North West area and 180 to the Cam North East extension to meet Government allocation requirements to 2040. 	Comment noted.
	<ul style="list-style-type: none"> The Cam Parish Council website states that currently 690 houses have been given the go-ahead for development in Cam. There is a pending application for 1100 at Draycott (which was only identified by SDC for 900 houses) and an expected application for 450 coming in since land has recently been sold. These figures do not include development on PS24 and PS25. The allocation to 2040 is likely to be exceeded in the next couple of years for Cam. EB98 does not reflect this. 	The TFR and TFR Addendum has assessed the site allocations as included in the SLP which is as required to demonstrate the suitability of the local plan. Planning applications for development proposals will be considered with reference to the made Development Plan, with a suitable level of weight afforded to emerging Plans, depending on their status at the time of determination.
Individual (23) PS24, PS25	<ul style="list-style-type: none"> The transportation study takes no account of the huge increase in housing that has happened along the A4135 between "High Street" and the Slimbridge roundabout. 	The strategic modelling assessment has been undertaken in accordance with best practice and industry-standard guidance, and agreed with GCC and NH. The TFR and TFR addendum sets out the methodology for calculating traffic growth within the assessed scenarios. Details of committed schemes from the local area is



	<ul style="list-style-type: none"> Box road development has 250 houses already delivered with another at least 300 to come - additional there have been 40 ish build on the adjacent site. 	provided in the Uncertainty Log appended to the TFR and TFR Addendum. Wider growth is also accounted for through the use of TEMPRO factors, in line with DfT TAG methodology, which NH has agreed is appropriate
	<ul style="list-style-type: none"> There is no plan to deal with the walking to Slimbridge school over the railway bridge! There is no plan to deal with the Box Road access and exit The installation of traffic light further along the A4135 will only bunch traffic up and prevent flow 	The highway mitigations shown in the TFR and TFR Addendum are just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications in the Dursley and Cam area, especially in relation to a 'decide and provide' approach to sustainable transport. Further detail for specific locations will be assessed and determined as part of future planning applications.
	<ul style="list-style-type: none"> The infrastructure improvements need to be delivered first before any build works commence - hopefully someone in the Council has the Business acumen to negotiate this!! as SDC have a very poor reputation for being able to achieve this for all previous developments in Cam 	Timescales for implementation will be established through the planning application process.
Individual (26) BER016/17, PS34, PS35, PS36	<ul style="list-style-type: none"> 5,000 houses will be 10,000 cars at least, as everyone has two. Our country lanes cannot take this volume of traffic, they are narrow and full of potholes. 	The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. The traffic generation and distribution for the strategic sites have been discussed and agreed with the highways authorities, and are not considered to under-estimate external traffic generation. The assessment has been undertaken on the basis of best practice and industry-standard guidance, and agreed with the relevant highways authorities.
	<ul style="list-style-type: none"> The motorway junction at Falfield (J14) certainly cannot take any more volume of traffic there. 	Mitigation for M5 J14 is proposed through the SLP process.
Individual (30) PS37	<ul style="list-style-type: none"> The area around Slimbridge and northern Cam has low levels of local employment, poor public transport and high levels of commuting to access the M5, they are predominantly dormitory areas. New housing estates with young families will tend to increase this commuting, not reduce it. The increase 	The mode shift available for this site as identified in the STS and STS Addendum are considered to be appropriate for the level of ambition and investment required for sustainable travel across the district. The shift is specifically tied to infrastructure which will enable sustainable travel.



	<p>in housing numbers and road journeys (+30%) should strengthen highway mitigation measures but none have been recommended. All local schools in Cam are also beyond capacity leading to additional car journeys, further exacerbating the situation. The modal shift improvements estimated in the report from using public transport and the footbridge etc are wholly unjustified and considered overly optimistic. These impacts on traffic levels, particularly at rush hour, have not been modelled or are unrealistically optimistic.</p>	<p>The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. This includes without the modal shift changes to traffic levels.</p>
	<ul style="list-style-type: none"> The twin lane 'mitigation' proposal for the A38 northbound approach to the A4135 roundabout will not materially improve traffic flows as this is already two lanes. Volume over capacity junction improvements from 105 to less than 64 are wholly unjustified and unrealistic. The report significantly underestimates the traffic impacts at the roundabout which will remain over capacity. 	<p>The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the site allocation at Wisloe (PS37), especially in terms of a 'decide and provide' approach to sustainable transport.</p> <p>The IDP states that "widening" could be considered for the A38 northbound lanes, which could be more than two lanes if highway capacity enhancements were sought to mitigate effects of future year traffic demand.</p> <p>The strategic modelling assessment has been undertaken in accordance with best practice and industry-standard guidance, and agreed with GCC and NH. There is no evidence to suggest that the traffic flows / results are inaccurate or that the improvements /mitigation assessed, would not be able resolve the traffic effects of the SLP. The modelling results presented in these reports are robust and accepted by GCC as the relevant highway authority.</p>
	<ul style="list-style-type: none"> PS37 should be removed from the DLP and a more sustainable site (PGP1 or PGP2) with fewer inherent issues substituted in preference. 	<p>SDC considers that the allocations proposed in the SLP are appropriate and presents the Plan for examination on this basis.</p>
Individual (31)	<ul style="list-style-type: none"> Poor and deteriorating bus service 	<p>The STS and STS Addendum provides the framework and policy basis for specific sustainable transport mitigation to be secured.</p>



PS37	<ul style="list-style-type: none"> • too many aspirational proposals ie new footbridge to station, more cycle paths • Mitigation of 2 lanes already exists 	
Individual (33) PS37	<ul style="list-style-type: none"> • Insufficient mitigation of the inevitable increase in traffic flows along the A38. This road is already at capacity at peak times often making access difficult for the resident. 	The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network.
Individual (40) PS33, BER016/17, PS34, PS35, PS36	<ul style="list-style-type: none"> • The road infrastructure is insufficient. • Early mornings m5 junctions already full. • Parking at Cam Dursley station already full • Country lanes are not used to extra volume • 5,000 houses could mean 10,000+ cars 	The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. Sustainable access improvements to Cam and Dursley Station are included in the STS and STS Addendum.
Individual (43) PS33, BER016/17, PS34, PS35, PS36; EI13, EI14, EI15	<ul style="list-style-type: none"> • The sites are very rural served by small country lanes with difficult junctions to the A38. The proposed traffic lights at Berkeley may make these junctions less dangerous but no improvements are planned to Breadstone which is highly dangerous today never mind with hundreds of additional north bound motorists using this route. Overall the local infrastructure can to <i>[sic]</i> cope with circa 5000 additional cars at phase 1 rising to 10000 when the full development is complete. There are no viable transport proposals and the reopening of Sharpness for commuters hasps been discounted due to economics. The suggestion that residents will cycle and walk and use the canal is unrealistic. 	<p>The access arrangements and more detailed impact at site allocations will be provided during the planning application process.</p> <p>Improvements are not shown at the A38 / Breadstone junction as to increase capacity at this location would only serve to increase rat running on inappropriate roads. The highway mitigation strategy shown in the TFR and TFR Addendum are just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the strategic site allocations, especially in relation to a 'decide and provide' approach to sustainable transport. Further detail for specific locations will be provided as part of future planning applications.</p>
Individual (44) PS24, PS25	<ul style="list-style-type: none"> • Cam is a village (not a small town) and the traffic that the proposed development will generate has not been properly understood or forecast. Proper assessment and forecasting is necessary to fully understand the impact that increased traffic will have on the area and its residents. 	The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network.



<p>Individual (45)</p> <p>PS24, PS25; CP2, CP8, ES5</p>	<ul style="list-style-type: none"> An impact assessment on the road infrastructure in Cam and the surrounding area is crucial before any new developments are approved. They are already at maximum capacity and were designed when Cam was a small village, yes a small village. SDC planners have totally ignored the issues surrounding the local road infrastructure and other sites which have been earmarked for overdevelopment. 	<p>The TFR and TFR Addendum present an impact and mitigation assessment for the Plan as a whole. Development proposals will be expected to provide detail on local impacts and mitigation.</p>
<p>Individual (50)</p> <p>PS34, PS35, PS36</p>	<ul style="list-style-type: none"> I am not an "expert" - I live adjacent to the B4066 at Berkeley Heath - in recent years the increase in traffic past my house has been significant particularly since the building of new estates at Sharpness, Berkeley and the lorry park at Sharpness Docks, so much so that my house shakes throughout the day when heavy traffic passes. The Berkeley by-pass had been intended to extend up Alkington Lane to the A38. This kind of road will need to be in place to cope with the traffic generated by the hundreds of houses you are planning. The current road systems are totally inadequate for the amount of proposed traffic. 	<p>The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. The highway mitigation strategy shown in the TFR and TFR Addendum are just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications, especially in relation to a 'decide and provide' approach to sustainable transport. Further detail for specific locations will be provided as part of future planning applications.</p>
<p>Individual (58)</p> <p>PS24, PS25; CP2, CP8, ES5,</p>	<ul style="list-style-type: none"> An impact assessment on the road infrastructure in Cam and the surrounding area is critical before any further developments can be assessed. There have been no road improvements on the A4135 to support any of the new developments that have already been built and that are still carrying on being built. Therefore, the forecasting report estimates are in my opinion way too low and not supported. The roundabout at the bottom of Cam Pitch is already at capacity with many near misses, many times I have had difficulty walking across this road to 	<p>The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. The assessment has been undertaken on the basis of best practice and industry-standard guidance, including in relation to committed growth from developments locally.</p> <p>Mitigation of impacts on the A4135 corridor is achieved via the STS, which indicates provision of bus priority measures along this corridor to reduce dependence on car use. Additionally, SDC will require the planning application(s) for any site allocation or other development within the District to consider the mitigation requirements local to the site.</p>



	get the local Church. This is not mentioned throughout any documentation.	
Individual (59) PS24, PS25, PS37	<ul style="list-style-type: none"> No empirical data to support conclusions: there appears to be little or no empirical evidence to underpin the assessments and there are a large number of unsupported estimates and assumptions. No holistic assessment of current and future development as would be expected in a strategic document. The forecasting report estimations are considered too low as the baseline numbers are not supported. 	SDC disagree with this assessment as the TFR and TFR Addendum provide a comprehensive assessment of the traffic effects of the SLP. The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. The assessment has been undertaken on the basis of best practice and industry-standard guidance for the preparation of Local Plans.
	<ul style="list-style-type: none"> Current transport is already at capacity. There seems to be no reference to the large number of pinch points on the A4135, for which there are no mitigations. Any one physically visiting the area will recognise that the transport is already at capacity, and that is before the full current developments have been completed. 	
Individual (60) PS24, PS25, PS37; mDCP1, CP2, CP3, CP6, DCP2, CP8, DHC1, CP11, EI1, CP15, ES3,	<ul style="list-style-type: none"> There is no recognition or assessment relating to the A38 being the only diversion route in the case of the M5 is closed, which frequently happens. The reports state that there are changes to travel behaviours ie moving from using cars (even if electric) to public transport and there is no evidence to support this. 	Any future planning application will be required to demonstrate the impact of any future mitigation schemes for the A38. The impact on journey times along the A38 would be part of this process. The SLP mitigation measures would not preclude the use of the A38 as a diversionary route on occasions when the M5 is closed.
	<ul style="list-style-type: none"> By contrast, there still appears to be a need to offset to thousands of additional car trips by making an additional lane on the A38 roundabout (there is one already!) for which again there is no evidence to back this up. The route East through Cam and Dursley is already congested and this would not provide assist even with current car travel levels. 	The highway mitigation strategy shown in the TFR and TFR Addendum are just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications, especially in relation to a 'decide and provide' approach to sustainable transport. Further detail for specific locations will be provided as part of future planning applications.
Individual (62)	<ul style="list-style-type: none"> The area around Slimbridge and northern Cam has low levels of local employment, poor public 	The mode shift available for this site as identified in the STS and STS Addendum are considered to be appropriate for the level of ambition



PS37	<p>transport and high levels of commuting to access the M5, they are predominantly dormitory areas. New housing estates with young families will tend to increase this commuting not reduce it. The increase in housing numbers and road journeys (+30%) should strengthen highway mitigation measures but none have been recommended. All local schools in Cam are over capacity leading to additional car journeys, further exacerbating the situation. The modal shift improvements estimated in the report from using public transport and the footbridge etc are wholly unjustified and considered overly optimistic. These impacts on traffic levels, particularly at rush hour, have not been modelled or are unrealistically optimistic.</p>	<p>and investment required for sustainable travel across the district. The shift is specifically tied to infrastructure which will enable sustainable travel.</p> <p>The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. This includes without the modal shift changes to traffic levels.</p>
	<ul style="list-style-type: none"> The twin lane 'mitigation' proposal for the A38 northbound approach to the A4135 roundabout will not materially improve traffic flows as this is already two lanes. Volume over capacity junction improvements from 105 to less than 64 are wholly unjustified and unrealistic. The report significantly underestimates the traffic impacts at the roundabout which will remain over capacity. 	<p>The highway mitigation strategy shown in the TFR and TFR Addendum is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the site allocation at Wisloe (Ps37), especially in terms of a 'decide and provide' approach to sustainable transport.</p> <p>The IDP states that "widening" could be considered for the A38 northbound lanes, which could be more than two lanes if highway capacity enhancements were sought to mitigate effects of future year traffic demand.</p> <p>The strategic modelling assessment has been undertaken in accordance with best practice and industry-standard guidance, and agreed with GCC and NH. There is no evidence to suggest that the traffic flows / results are inaccurate or that the improvements/mitigation assessed, would not be able resolve the traffic effects of the SLP. The modelling results presented in these reports are robust and accepted by GCC as the relevant highway authority</p>



	<ul style="list-style-type: none"> PS37 should be removed from the DLP and a more sustainable site (PGP1 or PGP2) with fewer inherent issues substituted in preference. 	SDC considers that the allocations proposed in the SLP are appropriate and presents the Plan for examination on this basis.
Individual (65) PS24, PS25	<ul style="list-style-type: none"> The forecasting predictions are way too low and are not backed up by any evidence. Cam Pitch roundabout is already at capacity. Roads along Cam high street are very dangerous and this will only be exasperated by additional vehicles Cam has seen a huge increase in development over the last 5 years along Box Road and at various infill sites. The proposed developments will place huge pressure upon an already overloaded infrastructure and will infringe upon the green spaces. The proposed developments are against the Cam Neighbourhood plan adopted by the community. 	<p>The assessment has been undertaken on the basis of best practice and industry-standard guidance.</p> <p>Mitigation of impacts on the A4135 corridor is achieved via the STS, which indicates provision of bus priority measures along this corridor to reduce dependence on car use. Additionally, SDC will require the planning application(s) for any site allocation or other development within the District to consider the mitigation requirements local to the site.</p> <p>The alignment of the SLP to adopted Neighbourhood Plan is not a matter for the highways evidence base.</p>
Individual (69) G2	<ul style="list-style-type: none"> Regarding relevance of these comments to any 'new technical evidence' my concern is that nothing has been included to address what are obvious potential problems with additional vehicle movements in Upton Lane and Haresfield Lane and solutions have been ignored for what is documented as an area of concern. Also, I do have to say that being somewhat of a realist, all the comments about sustainable travel e.g., Walk, Cycle and catch the Bus are not, in my opinion, realistic solutions. The G2 site is severely constrained by the physical barrier of the Railway Line and any ability to move about and interact with Quedgely is impossible, and individuals will resort to their own private vehicles to move about. 	<p>The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network.</p> <p>The STS and STS Addendum set out a framework and policy basis for ensuring that sites come forward in as sustainable a manner possible.</p>
Individual (80) PS25, PS36, PS37	<ul style="list-style-type: none"> Station: It appears that there is no plan to improve C&D Train station until 2035. The station is already at capacity with parking issues and the fact that the 	The capacity of existing rail services at Cam and Dursley railway station is a matter for Network Rail. Consideration for expansion of provision is outside the scope of the SLP process. Possible improvements to service



	<p>station can only accommodate two carriages. If one of the arguments given that one of the main reasons for such dense development in Cam is the links to public transport then this is wrong. Developments in Wisloe, Sharpness and Berkeley all use the station as a selling point. The station, roads leading to it and the lack of parking all prevent it from serving the increase of users.</p> <ul style="list-style-type: none"> • I believe that when parking chargers are enforced it will lead commuters to park in the Box Road Development causing more problems. • There is no mention of the aged railway bridge (A4135) it is already woefully narrow and dangerous how will increased traffic cope? 	<p>frequency may be available long-term as part of the MetroWest proposals (30min frequency service between Bristol Temple Meads and Gloucester). Access improvements to the station for sustainable modes and contributions from development towards the enhancement of passenger facilities is set out within the Local Plan.</p> <p>The local impacts of proposed allocations and associated mitigation will be determined and addressed through future planning applications.</p>
	<ul style="list-style-type: none"> • We have had little or no improvements that were promised as part of the Littlecombe Development. E.g. traffic calming on Hopton Road, improvements to Cam (Tesco) and Cam Pitch roundabout. We were also promised a new mini roundabout as part of the Box Rd Development/A4135, which would have eased traffic flow, but was abandoned. I do not believe that there are local job opportunities that are stated as part of the argument in favour of PS24 &25. There will be increased traffic with commuters, accessing education and needed retail opportunities in surrounding towns. 	<p>Comment noted.</p>
	<ul style="list-style-type: none"> • Public transport here in Cam is already poor; you only have to see the daily plight of locals not being able to catch buses, as they don't turn up/are not regular. The route directly to the train station has only just started again as a trial – will this even be running? 	<p>The STS and STS Addendum set out a framework and policy basis for ensuring that sites come forward in as sustainable a manner possible. this includes requirements for sustainable transport measures along the A4135 corridor in Cam.</p>



	<ul style="list-style-type: none"> Proposals submitted currently on PS25 show a cycle track to station – I cannot see how this and other ‘green’ incentives will actually come about when house numbers have already increased to 315 – you cannot fit in the increase numbers and the community spaces, tree planting etc. They certainly will not be enforced and in so not support the increase in people and transport needs. 	Site allocations will be required to provide sustainable transport opportunities as part of any future planning application. This is a national requirement, as well as being a requirement of the SLP.
	<ul style="list-style-type: none"> We are seeing real effects of pollution on the main roads through Cam. Levels are high, it can be tasted when walking on the pavements – this will get worse with more idling vehicles. 	The SLP supports and sets out how future growth in the District will meet SDCs carbon reduction and climate emergency agenda. The STS and STS Addendum set out a framework and policy basis for ensuring that sites come forward in as sustainable a manner possible. this includes requirements for sustainable transport measures along the A4135 corridor in Cam.
Individual (85)	<ul style="list-style-type: none"> The report does not contain enough evidence and does not address road improvements required at Cam such as Box Road Junction A45. The Road systems can’t cope with the additional traffic. 	The TFR and TFR Addendum have demonstrated that the level of vehicle trips generated by SLP allocations can be adequately mitigated across the network. SDC will welcome proposals for mitigation in Cam, including on the A4135 through future planning applications for the strategic sites, especially in terms of a ‘decide and provide’ approach to sustainable transport.
Individual (86)	<ul style="list-style-type: none"> Station: There is no plan to improve C&D Train station until 2035. The station is already at capacity with parking issues and the fact that the station can only accommodate two carriages. If one of the arguments given that one of the main reasons for such dense development in Cam is the links to public transport then this is wrong. Developments in Wisloe, Sharpness and Berkeley all use the station as a selling point. The station, roads leading to it and the lack of parking all prevent it from serving the increase of users. 	The capacity of existing rail services at Cam and Dursley railway station is a matter for Network Rail. Consideration for expansion of provision is outside the scope of the SLP process. Possible improvements to service frequency may be available long-term as part of the MetroWest proposals (30min frequency service between Bristol Temple Meads and Gloucester). Access improvements to the station for sustainable modes and contributions from development towards the enhancement of passenger facilities is set out within the Local Plan.
Individual (87) PS24, PS25	<ul style="list-style-type: none"> It is clear there is a funding gap between what is promised and what is delivered, with no funding 	The funding and delivery approach to key infrastructure is outlined in the TFDP. The provision of other mitigation schemes will be delivered through the planning application process for future development sites.



	<p>appearing to be allocated to ease any of the negative aspects as outlined in both the STS and IDP both supporting the Local Plan The local neighbourhood plan made recommendations that have not been reflected within the planning assessments for PS24/25. One can only conclude that PS24/25 will give Cam residents increased traffic, pollution and congestion on their roads.</p>	<p>The alignment of the SLP to adopted Neighbourhood Plan is not a matter for consideration within the highways evidence base.</p>
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