

Stroud District Local Plan (2020-2040)
STRATEGIC MATTERS STATEMENT OF COMMON GROUND

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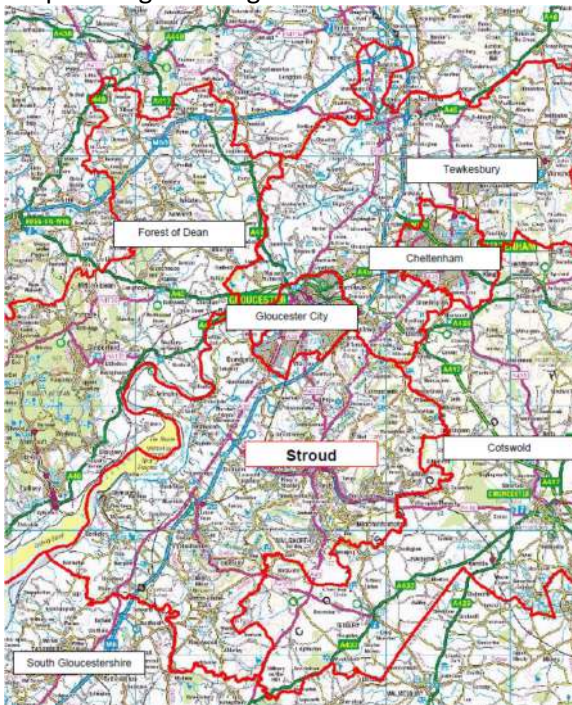
South Gloucestershire Council
Stroud District Council

March 2023

1. Introduction and background

- 1.1 This Statement of Common Ground (SoCG) covering strategic planning and transport matters has been prepared at the submission of the Stroud District Local Plan (2020-2040), and subsequently updated in March 2023. It has been signed by South Gloucestershire Council (SGC) and Stroud District Council, (SDC) referred to hereafter as ‘the parties’.
- 1.2 The purpose of the SoCG is to set out as at March 2023 areas of agreement and matters on ongoing disagreement between the authorities in respect of how strategic cross boundary issues have been addressed through the preparation of the Stroud District Local Plan. Since this SoCG was first prepared both parties agree, through regular meetings of senior corporate officers and planning officers, and more intensive engagement at key stages in the plan-making process, they have sought to work constructively and actively on matters of strategic cross boundary importance. South Gloucestershire Council and Stroud District Council are adjoining local planning authorities which share an administrative boundary.

Map of Neighbouring Local Authorities



2. Governance arrangements

- 2.1 Stroud District Council has established formal governance arrangements with the other local planning authorities within Gloucestershire. A Gloucestershire SOCG has been developed to identify how these authorities will work together on strategic planning and transport matters. South Gloucestershire Council which is one of the four unitary authorities that comprise the West of England group of local authorities and also part of the West of England Combined Authority (WECA), has established formal governance arrangements with its neighbouring authorities. In May 2022 the WECA Mayor made the decision to halt work on the WECA Spatial Development Strategy (SDS). Until that time SGC had been engaging constructively and on an on-going basis with Bristol City Council, Bath and North East Somerset Council and WECA in the preparation of the SDS, which was intended to provide a strategic plan for the WECA area and therefore, the framework for the three constituent UAs Local Plans. The SDS was also proposed to provide the strategic planning framework for important cross-boundary matters such as housing and transportation infrastructure.
- 2.2 Since the halting of work on the SDS, SGC has confirmed, as per its Cabinet decision on 10th October 2022, that it will be developing strategic policies through the South Gloucestershire Local Plan and in so doing: will continue to co-operate and work with the other combined authority UAs in preparing their respective Local Plans, that the three Local Plans will provide the strategic planning framework for the WECA area; and that the issue of housing need will now be addressed through these individual Local Plans.. These formal arrangements reflect the primary functional relationships between adjoining authorities on strategic planning and transport matters.

3. Key strategic matters that have been relevant during the preparation of the Stroud District Local Plan

- 3.1 The parties agree these are as follows and as set out below:
- The housing requirements of the respective Housing Market Areas (HMAs)
 - The impact of growth proposals on the Severn Estuary
 - The identification and delivery of strategic transport measures to support the sustainable delivery of growth proposals

The housing requirement

- 3.2 The Gloucestershire Local Housing Needs Assessment (2020) identifies Gloucestershire as a Housing Market Area (HMA). The 2020 West of England Local Housing Needs Assessment identifies SGC forming part of the Greater Bristol HMA.
- 3.3 The parties agree it is an appropriate pragmatic approach to ‘snap’ the boundary of the Gloucestershire HMA to include Stroud District and to ‘snap’ the boundary of the West of England HMA to include South Gloucestershire.
- 3.4 The Stroud District Local Plan identifies a housing requirement of at least 12,600 new dwellings to meet the needs arising from within Stroud District for the period 2020 to 2040. This requirement takes appropriate account of the standard housing method. A supply of 14,935 new dwellings is identified in the submission Local Plan.
- 3.5 The parties agree that the full needs of Stroud District for the period 2020 to 2040 can be met within its administrative boundaries and there is no requirement for South

Gloucestershire Council to seek to address any unmet needs arising from within Stroud District at this time.

- 3.6 The parties also agree the South Gloucestershire Local Plan, which will set the housing requirement for South Gloucestershire, is at a very early pre-submission stage. The local housing need for South Gloucestershire as established by the Standard Methodology is currently a minimum of 28,000 dwellings (c1400p/a) over the period 2022-2042. As at February 2022, some 16,000 homes have planning consent in South Gloucestershire for this period.
- 3.7 The parties agree that no decisions have been made where new housing growth, beyond existing commitments, should be located in SGC and any assessment of housing needs and its spatial distribution will be a matter to be considered in due course through the SGC Local Plan examination process. Both parties also agree it is not the role and function of the SDC Local Plan to prejudge where additional housing growth would be located in SGC at this very early stage of the SGC Local Plan process. SGC is concerned that any assumptions made in the SDC Local Plan regarding contributions to infrastructure has the potential to risk influencing SGC's Spatial Strategy by predicating it towards supporting specific infrastructure provision. SDC agrees that it would not be appropriate for the SDC Local Plan to do this, but also does not consider that this is an outcome of the SDC Local Plan as submitted for examination.

Employment, Education, Training and Skills

- 3.8 South Gloucestershire Council, Stroud District Council and Gloucestershire County Council were partners to the Western Gateway joint nomination of sites at Oldbury and Berkeley (known as Severn Edge) to host the UK Atomic Energy Authority's proposed world first prototype fusion plant and associated 'eco-system' of research and development, businesses and training facilities (known as STEP). This bid was ultimately unsuccessful, but the Councils continue to promote Severn Edge as a centre of excellence for delivering low carbon energy technologies and that maximises benefits and minimises impacts for the local and wider area. As a part of this the Councils along with other partners including Business West, Nuclear SW, South Gloucestershire and Stroud College, Magnox and Horizon Nuclear Power Ltd continue to work closely together and meet regularly to maximise opportunities and address constraints that this project may bring. Given the scale of the opportunities at Severn Edge, there are a range of socio-economic, environmental and transport opportunities and implications which are being jointly explored and addressed by the partners to the project.

The Severn Estuary

- 3.9 Both South Gloucestershire and Stroud District border the Severn Estuary which is one of the largest estuaries in Britain and has the second highest tidal range in the world. It has a natural and cultural heritage which deserves special attention, and it is a living and working environment for many people who live around its shores and care about its future.
- 3.10 The parties have worked together within the broad Severn Estuary Partnership (SEP) which is an independent, estuary-wide non-statutory initiative led by local authorities and statutory agencies working on the English and Welsh sides of the Estuary to promote a sustainable approach to planning, management and development, for all who live and work around the Estuary.

- 3.11 Both parties are currently contributing to the Shoreline Management Plan 2 Review being undertaken by the Environment Agency, principally through the Severn Estuary Coastal Group (SECG). The Severn Estuary Shoreline Management Plan was developed in partnership by local authorities, regulators and other stakeholders, as a high level non-statutory policy document designed to assist coastal flood and erosion risk management planning. The SECG develops evidence for and recommends policy changes to the Shoreline Management Plan and exchanges information on a range of issues related to coastal planning.
- 3.12 South Gloucestershire Council, Gloucestershire County Council and Stroud District Council are also working together with other partners via the Severn Edge project to ensure an integrated approach to planning for and delivering the necessary flood resilience, and to deliver environmental mitigation, Green Infrastructure enhancement and biodiversity net gain.
- 3.13 The Severn Estuary is a Special Area of Conservation (SAC) a Special Protection Area (SPA) and Ramsar site. In previous Reg.18 Stroud District Local Plan consultation stages, South Gloucestershire Council has commented on the Habitats Regulation Assessment (HRA) and has requested that it be made aware of any significant effects identified within the assessment which cumulatively might have implications for that part of the European Site within South Gloucestershire. Both parties agree SDC has fully complied with this request.
- 3.14 For this reason, South Gloucestershire Council in the Council's Reg.19 representation notes that Stroud District Council has followed national guidance in undertaking a Habitats Regulations Assessment and Appropriate Assessment on the potential impact of its proposals on the Severn Estuary European sites.
- 3.15 The parties also agree that growth proposals set out within the Stroud District Local Plan can be subject to satisfactory mitigation measures to ensure no adverse impacts on the Estuary.
- 3.16 Stroud District Council has an adopted Stroud District Severn Estuary Recreation and Mitigation Strategy (SERaMS) including a catchment area of 7.7km for identifying a recreational impact from growth. Stroud District Council will undertake a future review of the SERaMS and will consult with South Gloucestershire Council on the contents of this Strategy. Both parties agree this is an appropriate approach.
- 3.17 Accordingly, for the reasons noted above, the parties confirm that cooperative working to date between the two Councils has been satisfactory and that they will continue to co-operate and work together on Severn Estuary cross-boundary issues.

Transport

Context and actions taken to date

- 3.18 The National Planning Policy Framework requires transport issues to be considered from the earliest stages of plan-making. The planning system should actively manage patterns of growth to realise opportunities from existing and proposed transport infrastructure, to promote walking, cycling and public transport and to address impacts on transport networks and the environmental impacts of traffic and transport infrastructure. "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (NPPF, para. 104-105).

- 3.19 Transport assessment work on the Stroud District Local Plan has been carried out at a number of key stages in the plan making process and has involved partnership working with transport and planning authorities and key stakeholders. The principal transport evidence includes:
- Strategy Options Transport Discussion Paper (July 2018)
 - Sustainable Transport Strategy (February 2021), and Sustainable Transport Strategy Addendum (May 2022)
 - Traffic Forecasting Report (TFR) (March 2021) and Traffic Forecasting Report Addendum (April 2022)
 - Infrastructure Delivery Plan (IDP) (May 2021) and IDP Addendum (August 2022)
 - Transport Funding and Delivery Plan (TF&DP) (July 2022)
- 3.20 The principal duty to co-operate issue relates to working in partnership with transport and planning authorities and National Highways (formerly Highways England) to ensure that the transport network can accommodate the required housing and employment growth levels for Stroud District (and unmet needs arising from Gloucester City) in a sustainable manner which limits the need to travel, supports a choice of transport modes, makes the most of the existing strategic transport network and delivers appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains where required. The impact of proposed growth within Stroud is a cross boundary issue both to the north at Gloucester and to the south with South Gloucestershire.
- 3.21 Particular transport cross-boundary matters of relevance in this SoCG relate to: the opportunities for new public transport and cycling and walking connections on the South Gloucestershire/Stroud boundary; and existing and likely future capacity issues at M5 Junction 14 (located within South Gloucestershire).
- 3.22 South Gloucestershire Council and Stroud District Council planning officers have met regularly to discuss emerging strategic planning and transport matters and how they may impact across administrative boundaries. Since 2020 officers have also worked closely with Gloucestershire County Council through a working group to develop and promote the Oldbury-Berkeley proposal (known as Severn Edge) as a centre of excellence for low carbon energy technologies. Through this the Councils have worked jointly to promote sustainable transport links and facilities including a direct pedestrian, cycle and sustainable vehicle link between the Oldbury and Berkeley sites, park and ride/share facilities and links to public transport, water transport direct to the site and to Sharpness Docks, as well as improvements to road access and the M5 J14 to enable appropriate development proposals on these sites.
- 3.23 A Stroud District Local Plan Transport Group was set up in 2017 to progress partnership working on the Stroud District Local Plan transport matters. A core group of Stroud District, Gloucestershire County Council and National Highways met regularly during the plan making process to develop the above studies and to discuss key issues and potential mitigation measures. South Gloucestershire Council has been invited periodically to input into the assessment work and to discuss key issues and potential mitigation measures, especially relating to impacts on and mitigation measures for M5 Junction 14.
- 3.24 As part of their ongoing cooperation, National Highways, South Gloucestershire and Stroud District Council set up a process in 2018 to monitor and update the location and scale of planned development to ensure that likely traffic impacts on the Strategic Road Network

(SRN), in particular M5 Junction 14 and surrounding roads, are identified and included within the assessment of development proposals.

- 3.25 National Highways, South Gloucestershire Council, Gloucestershire County Council and Stroud District Council have also met regularly since 2021 through a Public Bodies Meeting and with a Developer Group consisting of promoters of housing growth proposals in South Gloucestershire (and latterly Stroud District) periodically since 2017, to discuss planned growth arising from both emerging development plans relating to South Gloucestershire and Stroud and speculative planning applications for housing and their likely impacts on M5 Junction 14 and adjoining roads and to identify potential mitigation measures and delivery mechanisms.
- 3.26 In summary, the parties agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with South Gloucestershire Council on strategic transport matters through the Duty to Cooperate.

Commitments for future work and collaboration

- 3.27 South Gloucestershire Council requested in the Council's Reg.19 representations to the Stroud District Local Plan *"further clarification on what Stroud DC consider to be the infrastructure evidence base and the degree of certainty that can be attributed to infrastructure interventions/ possible responses...The impacts from different developments therefore require fuller investigation and more detailed proposals for mitigation. We would assign a higher priority towards these issues working towards a comprehensive solution, including further joint working and a greater commitment to seeking developer contributions (potentially via a roof tax approach) to be worked up jointly with HE, SGC and WECA."* (SGC Reg.19 representation)
- 3.28 Within this context, South Gloucestershire has sought additional references within the Stroud District Local Plan to capacity issues at M5 Junction 14 and to improvements to strategic infrastructure to give more certainty to delivery, including Charfield Station, the Greenway and public transport improvements. The Council also sought additional references to the need to secure improvements to infrastructure related to the Severn Edge proposal.
- 3.29 The parties agree that following submission of the Stroud District Local Plan in October 2021, Stroud District Council has worked collaboratively with South Gloucestershire Council, National Highways and Gloucestershire County Council to prepare further transport evidence (Traffic Forecasting Report Addendum, Sustainable Transport Strategy Addendum and Transport Funding and Delivery Plan), with the intention of making progress on the outstanding matters relating to the detail of the mitigation required and mechanisms for the funding and delivery of the necessary strategic transport infrastructure.
- 3.30 The parties also agree that South Gloucestershire Council has responded to these additional transport technical documents in October 2022, see SGC letter dated 24th October 2022, EIP Ref: EB113c Rep 71. The parties note the response maintains existing objections including that the reasonable prospects of infrastructure funding to deliver the junction cannot be secured in the way envisaged by Stroud District Council. The main reasons given are:

1. Following WECA stopping work on the SDS, the strategic planning framework for establishing the housing requirement, its spatial distribution and the infrastructure needed to support it will be established by the South Gloucestershire Local Plan. As this

plan is at a very early pre-submission stage there is significant uncertainty, beyond the currently identified commitments, (some 16000 homes), as to the level of and the spatial distribution of, future growth in South Gloucestershire.

2. The headline cost for delivering the junction upgrade of £27M, inclusive of the dualling of the B4059 between the motorway junction and the A38 appears to be very low when compared to a cost estimate prepared by Atkins on behalf of WECA in February 2018 (nearly five years ago) which estimated a headline cost of £59m for a similar junction upgrade at Junction 14 of M5. This cost has not been supplied to SDC, but SGC accepts on the basis of information introduced into the examination through the MIQs that the cost is likely to be undervalued, and

SGC has also advised that the M49 junction in Severnside, also utilising an existing bridge as part of its solution, cost around £50M or thereabouts in 2017 prices, excluding the new link road. These costs SGC consider are more robust and are at a level where additional funding from either local, regional, or national, funding sources would be required to fund the majority of the scheme costs. SDC accepts that it is likely that additional external funding would be required.

Accordingly, SGC has requested that further certainty is required; and encouraged Stroud DC and National Highways to undertake a benchmarking exercise of similar junction upgrades to enable agreement with all parties of an up-to-date cost estimate.

3. SGC is unable to agree to the funding apportionment outlined in EB109 related to the South Gloucestershire/ Stroud M5J14 80/20 formulaic approach – as it is considered unrealistic given the absence of certainty on the South Gloucestershire Local Plan housing development allocations, as explained above. In these circumstances, it is considered to be unrealistic and premature to make any apportionment assumptions for the funding of the strategic upgrade to J14, or to assume that this funding from SGC development can be secured in the way envisaged by SDC for the new junction.

- 3.31 Stroud District Council recognises the uncertainty inherent in the current status of South Gloucestershire Local Plan, and therefore the uncertainty in terms of the exact funding sources and levels of traffic to enable the design work to progress. However, given the delays in strategic plan making in South Gloucestershire, the District Council has limited options but to progress and seek to demonstrate at the examination that there is a reasonable prospect that strategic mitigation is deliverable, whilst recognising that there are details to be developed and agreed relating to the significant costing and public funding required as to how that happens, and there is commitment to ongoing working with all parties to ensure that it does.
- 3.32 SGC's Local Plan will need to include appropriate transport assessment at the relevant time in the process, which will include the cumulative mitigation requirements for SGC's Local Plan. The impacts of speculative development within both SGC and SDC will need to be assessed through the development management process and mitigation identified and delivered in line with the NPPF. Notwithstanding this, the parties agree that for the purposes of the SDC EiP the delivery and funding of J14 is a matter solely related SDC Local Plan and that SGC is not party to any MOU or other joint undertaking to support delivering and funding the strategic works required for J14. Moreover, neither has a quantum of development and its location in proximity to J14 been specifically identified at this point in time in SGC against which the 80/20 formula can be applied. Accordingly, the parties agree

that should the scale of development not come forward in SGC as envisaged by SDC for the purposes of funding the required works to J14, then it will be for SDC to find alternative strategic mitigations to ensure it can continue to deliver its housing requirement in a timely and effective way.

- 3.33 Stroud District Council acknowledges the need for the Stroud District Local Plan to set out clearly the necessary infrastructure required for each strategic development and how it will be delivered, together with clarity on the transport assessment work and travel plans required from developers. The Council is happy to propose specific modifications on the basis of the information contained within the additional technical work undertaken since 2021.
- 3.34 The parties agree to work together and with National Highways and developers to determine appropriate infrastructure at M5 Junction 14 and associated roads, safeguard land to enable the intervention, detail the triggers and timing for interventions, and devise a funding and delivery strategy for identified improvements.
- 3.35 The parties agree to work together to develop any further transport evidence required to accompany the Stroud District Local Plan during examination.
- 3.36 The parties agree to work together to implement the transport policies contained within the Stroud District Local Plan (2020 to 2040), where relevant, when adopted.
- 3.37 The parties agree to engage proactively and positively on ongoing strategic planning and transport matters relating to the Stroud District Local Plan and the emerging SGLP.

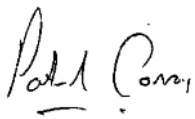
4. Matters that are not agreed

- 4.1 These can be summarised as:
 - 1. The costs of building the motorway junction, SDC putting forward the costs of £27m compared to the view of SGC that it should be over £60m, based on 2018 costs/ excluding current inflation, as set out in our 24th October 2022 letter. Notwithstanding this, SDC/SGC have agreed that it is likely that the cost of the scheme is undervalued, that it is likely that external funding sources would be required, and that both parties will work together with a view to securing such funding.
 - 2. The SDC position to base its delivery and funding strategy on securing S106 or CIL/ IL funding from yet to be identified development that may at some point in the future be located in proximity to J14. SDC consider this is a pragmatic position, created by circumstances, SGC strongly questions this and the assumptions made by SDC given the high level of uncertainty on the yet to be established future provision of housing and its spatial distribution, to come forward through the SGC LP.
 - 3. The SDC proposed 80/20 (South Gloucestershire/ Stroud) M5J14 cost sharing works funding apportionment outlined in EB109 and based on the Traffic Forecasting Model. SGC have raised concerns that it considers, in the absence of knowing with any degree of certainty the South Gloucestershire Local Plan housing development allocations, as set out above, it is not possible to agree an apportionment, and therefore this financial model and assumptions that underpins it, are not realistic as explained at para 3.30.

4. The level of funding for Charfield Station and Wotton-Charfield-Kingswood (WCK) Greenway project which SGC has requested. The current draft Stroud Local Plan (page 206) sets out a funding commitment for site PS47 to contribute towards these sustainable transport schemes. SGC considers contributions should be included in the IDP (EB110)

4.2 Based on the above, South Gloucestershire Council has raised concerns regarding the wording contained within the Stroud District Local Plan on transport grounds set out within the Council's Reg.19 representation. Whilst South Gloucestershire Council has put forward recommendations to resolve these matters, and Stroud District Council wishes to resolve these matters through agreeing appropriate modifications through the examination process where necessary, the matters remain unresolved at the current time.

5. Signatories



Signed on behalf of South Gloucestershire Council
Patrick Conroy Strategic Planning Policy and Specialist Advice Team Manager

Signed on behalf of Stroud District Council
Mark Russell Head of Planning Strategy and Economic Development



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Dated 8 March 2023