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Stroud

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Dear Ms Lucas and Ms Wright,

Stroud District Local Plan Review Examination

Thank you for your letter dated 2 October 2023, requesting National Highways provide a response to several questions in respect of the Stroud District Local Plan Review Examination.

National Highways is the strategic highway authority responsible for operating, maintaining and improving the Strategic Road Network (SRN). The SRN is a critical national infrastructure asset, and its role is to provide a safe, free-flowing and reliable highway network for strategic movements to support economic growth.

The SRN in relation to the Stroud Local Plan comprises the M5 motorway and its Junctions 12 and 13 located in Gloucestershire, and Junction 14 located in the South Gloucestershire Authority area. We therefore have a key interest in the future planned growth and development within Stroud.

National Highways has worked collaboratively with Stroud District Council throughout the Local Plan process. We have previously made written and verbal representations during the regulation 18 and 19 stages and during the Examination in Public hearing sessions.

The following paragraphs provide our response to your questions:

Inspectors' questions J12 and J14 of the M5

1. Is the timetable set out in the Action Plan realistic and achievable? If not, why not?

National Highways was not consulted on the published Action Plan before its submission to the Inspectors, therefore we had not previously agreed the milestones set out within it. Whilst we will continue to work collaboratively with Stroud District Council with best endeavours to meet the requirements of the Action plan, National Highways will need to manage this alongside our day-to-day function and statutory responsibilities across the region.

We note that the Action Plan is ambitious, and our contribution will be integral to the key tasks set out within the Plan. Our response to your remaining questions provides context to this point. At present, we have no additional resource to commit to the Action Plan timetable.

2. Are there any important steps / workstreams that have been omitted? And if so, why are these necessary?

At present a scheme Promoter has not been confirmed or agreed with regard to M5 J14. Whilst Stroud District Council has asked if National Highways would act as scheme promoter for M5 J14, this is not something we can commit to at this time. As you will be aware, growth infrastructure schemes would typically be promoted by the planning authority that requires the infrastructure to deliver its planned growth.

As set out in our written and verbal representations National Highways is undertaking an initial study between M5 J11 and M5 J14. However, this is at a very early stage and we are therefore unable to determine whether a scheme will be promoted, or would accommodate additional growth. At this time, there is also no guarantee that funding would be available for any scheme as the budget for the 2025 to 2030 third Road Investment Strategy (RIS3) is yet to be confirmed.

We are aware that Gloucestershire County Council has now indicated that it may lead on the design and costings for M5 J12, i.e. act as Scheme Promoter, and has initiated engagement with National Highways.

A Scheme promoter has still to be identified for M5 J14. National Highways is unable to take on this role and, in recent discussions, neither Stroud District Council as the Planning Authority, South Gloucestershire Council as the Local Highway Authority, or the West of England Combined Authority (WECA) as the Strategic Transport Authority were able to agree to act as the Scheme Promoter. It is therefore unclear how the design, funding and delivery strategy at M5 J14 will be developed.

We need to be satisfied that Stroud District Council, South Gloucestershire Council or WECA would act as Scheme Promoter and progress the development, costing and delivery strategy for an M5 J14 scheme in consultation and collaboration with National Highways and other parties. Without this commitment, we are unlikely to reach agreement for a scheme design or be satisfied with scheme costs and delivery.

3. Is there agreement as to the traffic data and forecasting and that this stage has been completed?

National Highways is familiar with the traffic assumptions used in the strategic modelling to support the draft Local Plan and has previously approved the Saturn modelling undertaken. However, as we stated in representations, we will require micro simulation modelling of the M5 J12 and J14 proposals, and this is also likely to be required for the business case for each junction.

National Highways has offered to assist in further micro simulation modelling at M5 J12 and J14 and we have offered to the Council our validated microsimulation models of these junctions.

We would suggest that the development of improvement schemes at M5 J12 and J14 provides an opportunity to review, reflect and update the traffic assumptions used in any future and detailed modelling of mitigation schemes.

Junction modelling is also required to detail the 'when' junction improvements are required, i.e. to detail the triggers for when an improved scheme is needed. In this respect, you will be aware that we are of the view that M5 J14 is effectively operating at capacity. We have also undertaken modelling at M5 J12 to inform when an improvement scheme may be required to support development proposed within the draft Stroud Local Plan. For National Highways, triggers are based on driver safety and the effective operation of the motorway (the local highway authorities will have different trigger criteria).

4. Is it realistic for a concept design to be agreed by all parties and for a preferred option to be agreed by December 2023?

Given we are now in mid-October, we do not consider that a concept design for M5 J12 and J14 can be agreed by December 2023.

Whilst the timetable is considered ambitious, National Highways considers that design and costing work could be completed in a six-month period if the respective design is informed by precedent and predicated on similar junctions elsewhere on the motorway network.

It is also usual to expect modelling to inform junction options and design. However, it may be that modelling, optioneering, design and costing tasks could be completed in tandem to satisfy the indicated timeline.

5. Is it realistic that scheme costs and a budget can be agreed by all parties by January 2024?

National Highways considers that it would be unlikely to have a costed scheme developed and agreed by January 2024, based on the dated timeline indicated by Stroud District Council. However, it is considered that this could be possible in a generic six-month period.

6. Can a funding and apportionment methodology be agreed with neighbouring Councils by January / February 2024? Are all relevant parties confident that this timescale is feasible, and that agreement can be achieved?

This will be dependent on the methodology to be developed by Stroud District Council. However, if the scheme cost is unknown, any apportionment could be considered abortive.

We suggest there are many appropriate models and precedents for scheme funding and delivery that could be considered by the Council to deliver required strategic infrastructure for both motorway junctions.

National Highways will need to be satisfied that any funding and apportionment plan will support the timely delivery of an improvement scheme. However, given the need for consultation and agreement with several parties and noting the important factor that scheme designs and costings have not yet been agreed, we do not consider that this can be achieved by January/February 2024.

7. Can a delivery scheme be agreed by the end of 2023?

Based on the comments above and noting that that Stroud District Council timetable was shared with us on 25 September 2023, it is considered highly unlikely.

Housing Supply

8. We note the workstream referring to assessing the potential for housing supply from sites not impacted by J12 and J14. In this regard, we are aware that National Highways has raised concerns that this has not been evidenced in modelling terms. We would therefore request that further information be provided as to the modelling that has been undertaken to demonstrate that any sites identified would not impact on these junctions (including those listed in the appendix 2ac6 note on housing supply). Any modelling would also need to be agreed with relevant partners including National Highways, and as such we would need clarification of this.

National Highways has received a technical note from Stroud District Council, prepared by Aecom and dated 11 October 2023, detailing M5 Junction 12 and 14 impact apportionment where those sites identified as directly impacting the respective junctions and included in the funding methodology have been removed.

The note details 100 trips in the AM Peak at M5 J12 across the whole plan period, and 29 trips at M5 J14.

National Highways respectively requests of the Inspectors' additional time to review the note and its workings. However, as stated at previous hearings, we note that M5 J14 is operating at capacity and that no further development impacting M5 J14 can safely be accommodated without mitigation.

Promoters of two sites in Charfield have been working with National Highways to detail an interim scheme at M5 J14 that mitigates the additional safety concerns that would materialise if their developments alone were allowed to progress. Whilst National Highways is satisfied that a scheme has been identified to mitigate the impact of these developments, we are still of the view that no further development excepting the Charfield sites should be allowed.

Where a refusal or holding response cannot be sustained by National Highways, it is advising the Local Planning Authority to consider seeking a proportionate contribution from the developer towards mitigation measures at the impacted junction should planning permission be granted.

Funding

Whilst we note that the Action Plan refers to identifying sources of funding, our letter dated 4 August acknowledged that it can usually take many years to bid for and secure appropriate funding for strategic road infrastructure. If we were to agree to pause the Examination for six months to allow for the completion of the Action Plan, we will require evidence (agreed with all relevant parties) of a firm commitment to the funding and delivery of improvements to J12 and J14 including clarification of when they would be programmed for implementation. Can this be achieved?

As mentioned at the hearing sessions, from experience securing funding can take many years. National Highways would need to be satisfied that any funding and delivery plan will support the timely delivery of an improvement at M5 J12 and J14 and would need to be informed by trigger ('when') modelling.

Specific funding streams will need to be identified and secured to provide certainty. Importantly, from what we have heard to date, this infrastructure would need to be delivered during the Plan period and so significant external funds would need to be secured prior to this. National Highways would need to be satisfied that any funding and delivery plan will support the timely delivery of an improvement scheme.

Notwithstanding the content of this letter, National Highways is committed to continue collaborative working with Stroud District Council and the Scheme Promoters in developing deliverable junction designs, explore funding opportunities and delivery routes for necessary SRN infrastructure improvements. We will continue to collaborate on junction modelling to indicate when improvements at M5 Junctions 12 and 14 will be required leading to the adoption of a sound local plan.

Yours sincerely,



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