

25<sup>th</sup> October 2022

Ref: Ecotricity Eco Park / Transport Planning / CL / 001

Tower Wharf  
Cheese Lane  
Bristol  
BS2 0JJ

Programme Officer - Stroud District Local Plan Review Examination  
C/O Banks Solutions

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Sent by post and by email

Dear [REDACTED],

**Stroud District Local Plan Review Additional Technical Evidence – Limited Consultation**

Ridge and Partners have been instructed by Ecotricity to provide transport planning support in relation to the promotion of the Eco Park (allocation reference PS20) within Stroud District Council’s Local Plan. This letter forms a response to the recent limited consultation on the Additional Technical Evidence presented on the 27<sup>th</sup> of September 2022. This review considers **EB98 Traffic Forecasting Report Addendum**.

We broadly support the technical work undertaken to support the emerging Local Plan. This letter simply sets out our observations on the additional technical work now presented, on the basis that we may wish to raise points with the Local Plan Inspector during the Examination in Public should the need arise.

On review of the Traffic Forecasting Report Addendum (EB98), it is our understanding that the traffic modelling for the local plan has been updated to reflect the other emerging allocations and this has resulted in an increase in the traffic growth applied to the network to account for the revised or additional sites added to the area traffic model. We note that there are no changes in relation to our Site, PS20.

Given recent information published by the Department of Transport on traffic growth in the UK (issued in September and October 2022) that shows less base growth than was previously forecast for assessment purposes, we consider that the Local Plan Model could overestimate background traffic growth. It could be argued that the local plan model is overly robust given that traffic growth in the Southwest is now -0.3% post the COVID pandemic.

There does not appear to be a scenario in the updated traffic modelling that takes account of lower background growth as a sensitivity test. An overly robust prediction at this stage is likely to result in an over provision of highway mitigation which would not align with Stroud District Council’s and Gloucestershire County Council’s commitment to become carbon neutral with the plan period. In relation to our site, over provision of highway capacity will have a bearing on the proposals for the A419 and Junction 13 of the M5 and how these are delivered.

Furthermore, on review the updated Local Plan modelling set out in the Traffic Forecasting Report Addendum does not appear to have tested the impact of the Stroud District Council Sustainable Transport Strategy as a standalone assessment. i.e., what change in traffic flows and impact would this strategy have without highway mitigation measures. The Sustainable Transport Strategy has only been tested with the proposed highway mitigation. It could be argued that the Sustainable Transport Strategy should be tested as a freestanding sensitivity test to show what this delivers without highway mitigation. How this strategy is delivered and proportioned could then be agreed

across the various sites within the local plan. A strong sustainable transport strategy could remove the requirements for some of the highway mitigation measures tested and help to meet net zero carbon.

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.

We trust that this letter sets out our understanding at this time and will allow us to discuss this further at the Examination in Public with the Inspector if required.

Yours sincerely

[Redacted signature]

[Redacted] BA (Hons) MSc CMILT  
Partner  
Transport Planning  
For Ridge and Partners LLP

C.C. [Redacted] (Ecotricity) and [Redacted] (Ridge Planning)