

Part B – Please use a separate sheet for each representation

Name or Organisation: Crest Nicholson Land and Partnerships

3. To which part of the Local Plan does this representation relate?

Core Policies

Paragraph	<input type="text"/>	Policy	Core Policy CP6 – Infrastructure and developer contributions (p.62)	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="yes"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="no"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="yes"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Again, it is noted that the proposed wording of Policy CP6 has not been subject to any significant revision or change compared to earlier versions of the policy that have been consulted on previously. It is critical that the Council ensures that the infrastructure improvements required to deliver the overall strategy are identified clearly and are timetabled so that development can occur without impediment. This is a fundamental requirement of soundness.

The Council has recently published an IDP Main Report (June 2021) prepared on behalf of the Council by Arup, which sets out infrastructure requirements under a series of themed headings. Notable in this regard is the Transport and Highways section of the report. It highlights that the previous version of the IDP, dating from 2014 identified 14 major pinch points on the road network in and around the district, including junctions 12, 13 and 14 of the M5 motorway, which were forecast to be approaching capacity towards the end of the Plan period. The current IDP notes that since then the DTP has published an update to the 2015-20 Road Investment Strategy (RIS1), which covers the period 2020-25 (RIS2). The RIS addresses management of the strategic road network (SRN) specifically. RIS1 did not identify any projects within Stroud district, and the successor strategy, RIS2 also does not allocate any funds to SRN improvements within the district. The closest project on this part of the M5 is at Jn.10. Reference is also made to the Highways England (HE) Birmingham to Exeter Route Strategy (03/17), which highlighted concerns regarding levels of congestion at junctions 9, 10, 11, 11a, 12 and 14 of the M5. The IDP notes that levels of congestion on the motorway could constrain economic growth in Stroud, and by association adversely affect the deliverability of the Local Plan.

The IDP notes that the Gloucester Fringe sub area connects to the SRN via Jn.12 of the M5 and that capacity concerns demand a solution to support the strategy of the Local Plan. The Gloucestershire Local Transport Plan (LTP) states that a scheme of improvements should be developed jointly by the District and County Councils working in partnership with HE. The strategically significant Cross Keys roundabout has been subject to recent improvements (2019) that were funded in part by S106 contributions from the development of Hunts Grove.

The transport modelling work informing the IDP shows that Jn.12 of the M5 is likely to be operating at capacity, with specific pinch points constraining the entry points to the B4008 and the northbound on-slip roads; an improvement scheme comprising a grade separated junction utilising two overbridges has been tested, but this is not yet fully developed and will require further development with HE. There is no indication within the IDP Main Report as to the likely cost of the mitigation scheme at Jn.12, or in respect of other pinch-point areas within the Gloucester Fringe that will require infrastructure improvements to the road network, although there is acknowledgement that demand management measures should form part of any solution. The report suggests that contributions will be sought from the main strategic allocations within the area: PS30 – Hunts Grove, PS32 South of M5 junction 12, PS43 Javelin Park, G1 South of Hardwicke, and G2 Land at Whaddon, with potential funding also sought from other schemes within the district given the strategic significance of the location.

The Infrastructure Delivery Plan (IDP) should identify the infrastructure, funding and delivery mechanisms that are needed to support the Local Plan and make clear that public funding will be sought alongside any S106 contributions from the planned allocations. However, in this regard it will also be important to distinguish between existing commitments that are being delivered and are

already allocated and schemes proposed for allocation through the review of the Local Plan.

The Hunts Grove extension is an existing development commitment forming part of the adopted development plan and as such should properly form part of the baseline for assessment when determining what infrastructure improvements are required to facilitate delivery of the emerging Local Plan allocations. Necessarily, the PS30 allocation (SA4) was subject to such consideration during the previous examination process. In this regard existing commitments should therefore benefit from any residual spare capacity that is available within the junction before pro-rata contributions are sought towards any improvement scheme. The policy should be drafted to ensure that contributions sought relate to the marginal impact that each development will have on the operation of the highway network; accordingly, existing capacity should be assigned to existing commitments rather than treating all the proposed allocations listed above in the same way.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Policy should explain clearly in the supporting text that the Council will actively seek contributions from available public funds towards key strategic infrastructure improvements that are fundamental to the success of the Local Plan. This will include contributions towards transport infrastructure comprising road and rail schemes the delivery of which is closely linked to the deliverability of the housing and employment strategies of the Plan. Public and private sectors will work together to ensure there is timely delivery and that contributions sought will be proportionate to impacts.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To assist the Inspector regarding the preparation of a sound Local Plan.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date:

21.7.21