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Date: 18 October 2023

**FAO The Inspectors appointed to examine the Stroud District Local Plan Review:  
Victoria Lucas and Yvonne Wright**

Dear Charlotte,

**Stroud District Local Plan Review Examination**

This correspondence is further to the letter that the Stroud District Local Plan (SDLP) Inspectors wrote to Kathy O'Leary (by e-mail) dated 2<sup>nd</sup> October 2023. This letter was subsequently sent to Gloucestershire County Council's (GCC's) Highways Development Management team on 3<sup>rd</sup> October 2023 and to me (via Kathy) on 6<sup>th</sup> October 2023. I also note your kind agreement for a short extension for our response to 20<sup>th</sup> October 2023.

The Inspectors are fully aware of GCC's views to date, given that GCC officers have actively engaged and responded via formal representations to every consultation stage of the emerging SDLP, and GCC officers and consultants also appeared at many of the Local Plan Examination's sessions. I will therefore not repeat them in this correspondence. From the outset GCC has been keen to work in partnership with all the interested highway authorities, key developers, Network Rail, Train Operating Companies and Stagecoach as strategic public transport providers.

GCC remains fully committed to the achievement of sustainable growth and housing / employment delivery in Stroud District and Gloucestershire as a whole. It is imperative, however, that this sustainable growth must come forward with the associated required strategic and local infrastructure.

I provide detailed answers to the specific questions from the Inspectors later in this letter. It should be noted that the separate issue of housing supply, including further sites, has not been considered at this stage, as that information is yet to be forthcoming from SDC. In addition, no comments are provided for M5 J14 as that junction is outside the jurisdiction and area of direct influence of GCC. GCC would be both keen and willing to be party to any relevant discussions for M5 J14, but are not proposing to appoint consultants to develop a solution for this junction. I understand that both South Gloucestershire Council (SGC) and National Highways (NH) will be providing further comments on this matter in their responses to you.

GCC notes that a draft Action Plan has recently been developed by SDC and I will provide detailed comments on its suitability and achievability, as I address the eight questions in the Inspectors' letter as referenced above. However, I must highlight that, at

this stage, having discussed the issue with our term consultants, they anticipate that the timescales for the evidence to be gathered and presented would take at least 6 months to reach conclusions that can usefully be shared with the Inspectors.

Following receipt of your letter, GCC has worked with our term consultants, Atkins Realis, in order to develop a comprehensive programme to fulfil a brief for an M5 J12 Feasibility Study that will demonstrate delivery of a highway intervention at J12, together with an indicative cost which could be used for initial cost apportionment discussions. It should be noted that there is no identified budget for this work and hence a funding agreement would need to be in place between GCC and SDC.

It should also be noted that a formal agreement on a proposed brief is not yet in place, but we would hope to achieve this by the end of October allowing an early November start using our term consultant. It is critical that National Highways own the methodology in terms of modelling and a design proposal, for which a dialogue is currently ongoing. Upon completion of this study, work on an apportioned funding agreement could commence.

In response to your 8 key questions, I can provide the following comments and observations:

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

*Summary of Delivery Plan Dates from Action Plan Junction 12 by January 2024, Apportionment/Funding agreement February 2024 and revised Statements of Common Ground by February-March 2024.*

Firstly, it should be noted that this Action Plan was produced and published without GCC's involvement. Whilst we will do all we can to support SDC in taking a local plan forward, the proposed dates in the Action Plan appear to be too optimistic. As indicated above, we are very willing to lead the work necessary to scope, cost and negotiate a funding agreement for M5 J12, but we have to note that we are only at the stage of preparing a brief for this work. We do not believe the technical work can be completed before May 2024 and we fear that negotiations for a funding agreement could take many months if the cost is dramatically higher than has been aired to date.

Being more specific:

- a. We do not have agreement of an acceptable brief between GCC and National Highways, but we aim to complete this by end of October to allow an early November start.
- b. If we achieve agreement with National Highways by this date our draft programme is set out below:

Project set up and agreement of brief.	Mid-end October 2023
Stage 0: Scoping and key stakeholder meetings	Mid-end October to December 2023
Stage 1:	Mid-October 2023 to January 2024

Establish baseline / constraints / identify gaps. Project objectives set and agreed	
Milestone Technical Notes	Drafted end January 2024 and finalised by end February 2024
Stage 2: Optioneering including modelling, design and costs	February to May 2024
Milestone Technical Notes	Drafted end May and finalised by end June 2024

- c. Following this programme would be discussions on apportionment and any subsequent revisions to Statements of Common Ground. If apportionment discussions with developers are to take place, this could take many months to negotiate and agree.

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

The proposed Action Plan from SDC for M5 J12 does not follow the Transport Appraisal Process as required by the DfT, (nor does GCC's proposed brief). We have not consulted SDC on our brief to Atkins yet and they may suggest the brief is too detailed for a Local Plan stage. However, GCC's proposed brief would at least identify a scheme that could be priced for the purpose of apportionment of costs and would be closely aligned with the Delivery Case for development of a DfT Business Case. Also the traffic modelling would accord with TAG guidance and industry standard good practice.

*Action Plan Activities;*

- a) *Collaboration and engagement;*
- b) *Design and costing for J12;*
- c) *Design and costing for J14;*
- d) *Funding and cost apportionment exercise;*
- e) *Deliverable – programme, report on designs, cost & apportionment, plus updated Statements of Common Ground;*
- f) *Housing Supply review including further site identification;*
- g) *Wisloe New Settlement – refresh and update viability statement;*
- h) *Sharpness New Settlement*
  - *liaison to reach agreement with Network Rail;*
  - *Reassess road based public transport provision;*
  - *Define Mobility as a Service.*

The steps summarised above within the Action Plan (a) to (e) appear to follow a linear process for M5 J12 and the interdependencies have not been highlighted. GCC's proposed programme for delivery of a solution for M5 J12 has taken account of the interdependencies and the need to reach agreement between a number of interested parties. In addition, in order to develop a series of meaningful Technical Notes to support a highway intervention at Junction 12, an ecological assessment and a safety review (light touch safety commentary for users of the highway) should also be included.

These additional requirements suggested and recommended by GCC have been included in GCC's proposal and programme. The overall proposal can be resourced by GCC's term consultants. GCC has assumed that the key interested parties (highway authorities and developers) will be available for a series of meetings within a fairly short timescale to agree the parameters for the concept design. It is currently programmed that these discussions will be completed by the end of 2023, but there is a risk that agreeing objectives between all parties could take longer than proposed as none have been previously agreed. Such proposed timings are out of GCC's direct control.

Data gathering needs more detailed scheduling, but it is hoped that this can be expedited during the early programmed collaborative meetings that GCC has suggested, although it may take longer and this, again, could delay the options' development. This is a risk to the timely completion of the Feasibility Study due to reasons outside the direct control of GCC.

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

The Stroud Local Plan Traffic Forecasting Report (March 2021) identified significant capacity issues and delays in the 2040 baseline without the proposed SDLP growth. With the proposed SDLP growth added, these problems are significantly exacerbated and would require major local and strategic infrastructure improvements. The report therefore proposes the replacement of the existing single overbridge dumbbell arrangement with a new all-movement, grade-separated junction incorporating two overbridges at M5 J12. GCC has previously stated that it is content with the traffic forecasting reports that were produced. GCC's key concern was about the costing for any proposed scheme and the robustness of these costs. Therefore, the additional work will provide a better understanding of these costs and may require some additional traffic modelling (specific modelling still being determined) to get certainty about any future scheme design.

To GCC's knowledge, the next stage has not begun to establish the level of data available for more detailed modelling nor seek confirmation that it can and will be shared between the relevant organisations. Although GCC would anticipate that this can be achieved, it will take some time to do so. The SDC Action Plan suggests this was completed prior to the issue of the Action Plan in September 2023.

### **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?**

GCC's consultants have advised that a realistic timescale for agreeing a concept design would be no earlier than May 2024. To achieve a realistically informed concept design for the highway intervention and achieve agreement between all parties, a programme has been developed (see provisional programme table above) which captures the interdependencies and time needed to confirm agreement between all relevant parties.

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

It is GCC's view that the concept design needs to exist before costings can be taken seriously and that the earliest date for this is May 2024. However, a costing for M5 J12 was undertaken at quarter 3 2022 prices at approximately £196m, by Atkins Realis. This excludes VAT at 20% (which a developer funded scheme would be liable for); excludes optimism bias (Treasury Green Book Rate of +44%); and excludes inflation to a realistic construction year. If this estimate proves to be anything like realistic, a total costing would be in the region of £350-£400m at point of build. In stark contrast, SDC have

provided evidence that the highway intervention packages for the Strategic Trunk Road Network at M5 J12 have been costed by SDC at £9,437,500 in the Transport Funding and Delivery Plan July 2022 (Appendix B).

GCC's belief is that if the M5 J12 project cost is high, apportionment solely amongst developers is unrealistic, and hence a simple funding agreement would not work. Drawing comparisons with our work within Gloucestershire at M5 J9 and M5 J10, with estimated project costs of £500m and £335m, a funding scheme would need access to government programmes on top of developer contributions. Whilst these programmes will change over time, these other junctions have progressed using the Government Road Investment Strategy (RIS); Housing Infrastructure Funding (HIF); and DfT Large Local Major (LLM). We believe that the RIS programme is fully allocated up to 2035, but acknowledge that other housing focussed infrastructure funding may emerge at some point.

**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?**

Whilst a discussion on funding and apportionment methodology could be run in parallel with the modelling, concept design and costing work, we would suggest that the potential scheme cost is likely to prohibit an early solution to the funding question.

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

In GCC's opinion, there is insufficient time available to agree a delivery scheme for the junction improvements at M5 J12 by the end of 2023. However, GCC is of the opinion that a well-developed and agreed programme of work should be in place by this date, but that concept design outputs will be no earlier than May 2024.

**8. Housing Supply**

Any changed approach to the housing supply proposed in the emerging SDLP would require a re-assessment by GCC. Although GCC would obviously be interested in reviewing a changed approach to the housing supply, it would need to be supported by a detailed, robust evidence package that quantifies the impact on local roads, M5 J12 and the SRN as a whole. GCC is aware that this was discussed at the Examination and that there were concerns raised that this may not be achievable. To date, GCC has not seen this further detailed evidence.

GCC appreciates the opportunity to provide further comments on the SDLP and I hope that the information provided in this letter comprehensively answers all of the Inspectors' questions.

I would be happy to provide further information on request.



**Pete Bungard, C.Eng; FICE  
Chief Executive**