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## **STROUD DISTRICT COUNCIL DRAFT LOCAL PLAN**

### **TRANSPORT OBJECTIONS TO PROPOSED ALLOCATION PS37 WISLOE ADDENDUM**

#### **1 Introduction**

- 1.1 Miles White Transport (MWT) has been appointed by Slimbridge Parish Council and Wisloe Action Group to review the transport related technical information behind Stroud District Council's (SDC) decision to include site PS37 Wisloe in the current Draft Local Plan (May 2021).
- 1.2 An initial transport objections document dated 2<sup>nd</sup> July 2021 was prepared by MWT and submitted as part of the previous consultation stage of the emerging Local Plan. However, SDC have now embarked on a further consultation on revised documents some of which are transport related. These revised / updated transport documents are:
- EB98 – Traffic Forecasting Report Addendum (April 2022)
  - EB108 – Sustainable Transport Strategy Addendum (July 2022)
  - EB109 – Transport Funding and Delivery Plan (July 2022)
  - EB110 – Infrastructure Delivery Plan (IDP) Addendum Report (August 2022)
- 1.3 This report provides a review of the above documents in terms of their effects on the proposed PS37 Wisloe allocation and represents an Addendum to the previously submitted transport objections used for the Regulation 19 consultation submission.

#### **2 EB98 – Traffic Forecasting Report Addendum (April 2022)**

- 2.1 The Traffic Forecasting Report Addendum (TFRA) identifies that the proposed site allocations within the latest version of the draft Local Plan have been amended. In total the number of additional dwellings proposed for the District has increased by 830 with 200 of this increase being at the PS24 West of Draycott site just to the south of the proposed Wisloe allocation. This is material as both the West of Draycott site and the Wisloe site are reliant on the A4135 and the A38 corridors together with the roundabout junction between the two.
- 2.2 Also of importance is the significant expansion of the PS43 Javelin Park employment allocation from 9 hectares to 27 hectares. This has the potential to further increase traffic flows on the A38 through the proposed Wisloe allocation and through the M5 Motorway junctions 12, 13 and 14.
- 2.3 Table 2.1 of the TFRA identifies five revised sites which make up most of the proposed change in dwelling numbers and employment areas.

- 2.4 These five sites are South of Hardwicke (G1), Land at Whaddon (G2), Northwest of Stonehouse (PS19a), West of Draycott (PS24) and Javelin Park (PS43). Table 3.1 of the TFRA can then be used to identify the vehicle trips associated with these five sites.
- 2.5 In the AM peak hour, the five sites are predicted to generate a total of 4,402 two-way trips and in the PM peak hour they are predicted to generate 4,385 two-way trips. By comparison, Table 5.6 of the original March 2021 Traffic Forecasting Report identified the same five sites as generating 3,293 two-way trips in the AM peak hour and 3,377 in the PM peak hour. The effects of the increase in dwellings and employment proposed is therefore significant at more than 1,000 two-way trips in both peak hours (approximately a third extra).
- 2.6 Given the above, one might reasonably expect a strengthening of the highway mitigation measures required to offset the impacts of this additional traffic. By contrast Section 4 of the TFRA identifies no change from the highway mitigation put forward within the March 2021 Traffic Forecasting Report other than identifying a ‘potential requirement’ for improvements to the B4008 near M5 Junction 12 and Javelin Park.
- 2.7 This means the only highway mitigation in the vicinity of the proposed Wisloe allocation remains the proposed widening of the A38 northbound approach to two-lanes (ID23 in Table 4.2 of the TFRA). **Figure 1** below shows the existing layout of the roundabout and that the A38 northbound approach already has two lanes as it approaches the give-way line.



**FIGURE 1: A38 / A4135 Roundabout**

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- 2.8 Any benefits associated with the proposed mitigation would therefore be minimal at best and likely have no material effect on junction operation, capacity or safety. Lengthening the section of two lane approach may increase stacking space for northbound vehicles to queue but would do little to increase the number of vehicles that could physically get through the junction at peak times. Also, if land outside the adopted highway were to be required to deliver a material widening, its availability cannot be guaranteed as it is outside of the Wisloe promoter's control.
- 2.9 It is noted from Table C.1 (junction 23) that the A38 northbound approach is predicted to have a maximum flow volume over capacity (V/C) ratio of 105 in the 2040 Local Plan 'no mitigation' scenario. Practical operational capacity is normally taken as being 85 meaning the approach would cause significant queuing and delays. It is difficult to see how the proposed minor widening would bring the northbound approach within capacity, yet Table C.1 also indicates that in the 2040 Local Plan 'with mitigation' scenario the maximum V/C at the junction reduces to 64 and switches to the A4135 westbound approach. In other words, the operation of the A38 northbound approach reduces from 105 to less than 64.
- 2.10 The above is considered unrealistic and indicates that the TFRA is likely to significantly underestimate the traffic impacts of the Local Plan on the operation of the A38 / A4135 roundabout. It also further draws into question the appropriateness of the large scale PS37 Wisloe allocation given its location adjacent to, and its reliance on, the roundabout and the A38 corridor.
- 2.11 It should be noted that the increased size of the proposed Land at Draycott allocation (200 extra dwellings, 122 and 102 extra two-way trips in the AM and PM peak hours respectively) would inevitably put further pressure on the roundabout compared to that assessed previously.

### **3 EB108 – Sustainable Transport Strategy Addendum (July 2022)**

- 3.1 The Sustainable Transport Strategy Addendum (STSA) initially identifies changes to national and local policy that have occurred since publication of the original Sustainable Transport Strategy in 2019. These all have the aim of improving walking, cycling and public transport facilities and the opportunities available to use such non-car modes of travel. Many of these policy requirements also feed through to the stated objectives of the Sustainable Travel Strategy.
- 3.2 Gloucestershire Local Transport Plan 4 (2020 – 2041) sets out the long-term strategy for transport within the County. It was adopted post production of the initial Sustainable Transport Strategy and therefore contains interventions that were not previously allowed for. These are summarised in Table 2-2 of the STSA.
- 3.3 In a local context, and potentially relevant to the proposed Wisloe allocation, the Table only identifies highway schemes, i.e., the Dursley Relief Road, and improvements at the A4135 / B4066 Dursley Road and the A4135 / B4060 Woodfield Road junctions.

- 3.4 These are predominantly intended to help resolve existing congestion issues and have little to do with providing sustainable travel opportunities.
- 3.5 It is also noted that the above two junction improvements have been secured through the Section 106 Agreement for consented residential development off Box Road, Cam (S.15/2804/OUT) and will be delivered once the appropriate trigger point of occupations has been reached. As such they are not being delivered through the Local Transport Plan itself.
- 3.6 The sustainable transport policies within the STSA have been amended slightly but remain generic in terms of requiring a site layout that prioritises walking, cycling and public transport over cars, providing bus stop infrastructure and bus services, seeking to amend personal travel behaviour, and providing electric vehicle charging facilities.
- 3.7 For the proposed Wisloe allocation, the sustainable travel requirements have been updated, as replicated below.

### Updates to Site Proposals / Policies

- Updated proposals also include measures to reduce car ownership outright, as well as car usage, including Mobility-as-a-Service (MaaS) systems to provide occasional access to vehicles, bike hire schemes and public transport vouchers/incentives.
- The development should provide high-quality, accessible and safe cycling and walking routes, connecting the site and facilities in Lower Cam, Cam, local centre, Draycott and Cam and Dursley stations. Furthermore, appropriate off-site active travel infrastructure and routes to be put in place to connect the new development with NCR41 to the north and Cam and Dursley Greenway to the south;
- The development will support and contribute to sustainable transport measures on the A38 and A4135 sustainable transport corridors;
- The development will improve access to sustainable travel modes to Cam and Dursley stations and contribute towards the improvement of passenger facilities; and
- Measures to reduce car usage and ownership will be part of the development, which will include Mobility-as-a-Service systems, bike hire schemes and incentives for public transport use.

**FIGURE 2: Extract from Page 17 of STSA**

- 3.8 The fifth bullet point is effectively a repetition of the first so can be ignored.
- 3.9 These updated proposals / policies appear to be watered down when compared to those put forward in the February 2021 version of the Sustainable Transport Strategy.

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- 3.10 Previously (page 28) there was specific mention of providing a primary school and local centre to help with internalisation of trips and more detail on the walking, cycling and public transport improvements required. The increased vagueness of the updated version is worrying and does little to install confidence in the measures or SDC's ability to deliver them through the planning process.
- 3.11 For the proposed Cam North West (Land at Draycott) allocation the STSA acknowledges that the increase from 700 to 900 dwellings would generate greater demand for sustainable and active travel thereby putting an increased importance on their inclusion within site plans. Again, it is disappointing to see the wording of the updated proposals / policies for that site watered down and made less specific. A failure to deliver very high standard non-car / active travel facilities and opportunities will inevitably lead to higher car use and a greater traffic impact.
- 3.12 The STSA introduces additional interventions which have emerged or been developed since the previous version of the Sustainable Transport Strategy. These are listed in Table 4-1 of the STSA. It is noted that none of these have any bearing on the likely travel choices associated with future residents or employees of the proposed Wisloe allocation.
- 3.13 The STSA reiterates that the traffic impacts of the draft Local Plan require mitigation in terms of both highway schemes (as discussed in Section 2 above) and sustainable travel schemes that focus on reducing the need to travel and enabling a modal shift away from private vehicles. Sustainable travel interventions should also be prioritised above purely highway capacity improvements. The STSA therefore includes “...a *greater level of ambition towards sustainable travel...*”
- 3.14 It is noted that each intervention or sustainable travel measure has been assigned a percentage reduction in trips that it is expected to deliver. This percentage has been discussed and agreed between representatives of Gloucestershire County Council (GCC), National Highways (NH) and SDC. Paragraph 5.9 of the STSA identifies that a balance has been sought between “...*the robustness of traffic generation reductions that can be achieved, along with the risks of under-assessing traffic impacts of the Local Plan, and the strong focus on sustainable transport needed to address the Climate Emergency.*”
- 3.15 Despite seeking such a balance, it appears the percentage reduction values are little more than an educated guess agreed between GCC, NH and SDC. No evidence has been put forward to fully justify the percentage reduction values used. There can be no guarantee that the percentage reduction values will be achieved and that the resulting traffic impact of the Local Plan will not be significantly greater than envisaged.
- 3.16 Table 5-1 of the STSA provides a summary of the percentage reduction in traffic generation associated with the latest document compared to the previous iteration. For the proposed PS37 Wisloe allocation these can be summarised as:
- Travel planning, internalisation and reducing the need to travel – increase in reduction from 6% to 10%.

- Public transport measures on the A38 – increase in reduction from 10% to 15%.
  - Pedestrian / cycle connection to Cam & Dursley Station – increase in reduction from 10% to 15% (noting overall target of 20%).
- 3.17 In addition, delivery of a sustainable transport spine through Wisloe, Cam and Dursley via the A4135 corridor is identified as delivering up to a further 10% reduction with this remaining unaltered from the previous version of the Sustainable Transport Strategy.
- 3.18 It is assumed that the increase in the percentage reduction applied is directly linked to the “...*greater level of ambition towards sustainable travel...*” put forward within the STSA. The ambition may well be there, but it remains the case that there is no evidence provided to justify the values used and no guarantee that these higher percentage reduction values will be achieved.
- 3.19 It also appears extremely convenient that an increase in the assumed percentage reduction values serves to help ‘mitigate’ for the increase in dwelling numbers and employment floor area put forward within the latest draft Local Plan. It is no wonder the TFRA identifies no need for more highway capacity interventions when the basis of the ‘with development’ assumptions used within it have changed.
- 3.20 The original transport objections submitted on behalf of Slimbridge Parish Council and the Wisloe Action Group (dated 2<sup>nd</sup> July 2021) identified the practical and technical difficulties likely to be associated with implementing the transport measures envisaged by the Sustainable Transport Strategy. These difficulties seem not to have been considered in any way when preparing the Strategy or its Addendum. Rather than repeat the numerous difficulties within this report, the reader is invited to refer back to Section 6 of the original transport objections.
- 3.21 Notwithstanding the above, it is also noted that there are considerable structural difficulties within the public transport industry at present. First Group in the Bristol area have recently withdrawn some bus routes and reduced service frequency on many others using a lack of drivers, cost of living pressures and changes in travel habits following the Covid-19 pandemic as justification. Stagecoach have also recently (12<sup>th</sup> October 2022) registered intent with the Traffic Commissioner to cancel or change bus services across Gloucestershire and to prioritise on urban and commercial routes that will leave some rural communities isolated.
- 3.22 The Department for Transport’s ‘Bus Back Better (2021)’ guidance and the ‘Gloucestershire Bus Service Improvement Plan (2021)’ may envisage improved bus services and infrastructure but clearly there are considerable viability, funding and staffing issues that may prevent implementation as planned.
- 3.23 Developers may be able to pump prime additional services but ultimately if there are no drivers and low passenger numbers they will be withdrawn or reduced in frequency. This in turn means there can be no guarantee that a transfer to public transport will deliver the percentage reduction in private vehicle trips assumed within the STSA, particularly now that the assumed reduction has been increased.

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- 3.24 The result would be an increase in the number of private vehicles on the roads when compared to that considered within the TFRA and the associated need for additional highway capacity improvements.
- 3.25 The proposed PS37 allocation at Wisloe is wholly reliant on the introduction of sustainable transport interventions and the transfer of travellers from private vehicles to non-car travel modes. The ability to deliver the necessary high standard infrastructure and public transport envisaged by the STSA must be drawn into significant question.
- 3.26 It is already worrying that the sustainable travel proposals / policies for the site (Figure 2 above) appear to have been watered down which further undermines confidence in the STSA. The above issues combine to strengthen the opinion of Slimbridge Parish Council and Wisloe Action Group that PS37 is not an appropriate allocation and should be removed from the draft Local Plan.

#### **4 EB109 – Transport Funding and Delivery Plan (July 2022)**

- 4.1 The Transport Funding and Delivery Plan (TFDP) identifies three main highway mitigation packages that are required to offset the predicted traffic impacts associated with the draft Stroud Local Plan. These are:
- Grade separation of M5 Junction 12, improvements to the Crosskeys roundabout and improvements to the B4008 junction in Stonehouse.
  - Grade separation of M5 junction 14 and dualling of the B4509 between the motorway and the A38.
  - A package of junction improvements along the A38 corridor.
- 4.2 These packages are then costed at approximately £9,437,500, £27,247,000 and £3,812,500 respectively.
- 4.3 Paragraph 3.2 of the TFDP identifies that the M5 Junction 12 and A38 corridor costs are presented as “...*half of the midpoint costs of those outlined in the GLTP.*” The reason for using only half the costs is not explained but by doing so the full costs and their distribution to the proposed site allocations is clearly inaccurate. This is particularly the case given the M5 Junction 14 costs have been derived from a different source and have not been halved.
- 4.4 Even if the M5 Junction 12 cost is doubled to be approximately £19 million it remains considerably below the £27.25 million put forward for the M5 Junction 14 scheme. Full details of the proposed improvements and their associated costings have not been provided within the FDP, but the schemes will likely both involve construction of a second bridge over the Motorway, and both involve associated improvements on the approaches (Crosskeys roundabout at Junction 12 / dualling of B4509 at Junction 14). The large disparity between the two costings presented therefore raises concerns over their accuracy. It would clearly be more appropriate / accurate for the same costing methodology and assumptions to be used for both schemes.

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- 4.5 It is also noted from Table 2 of the TFDP that the cost of mitigation works at the A38 / A4135 roundabout adjacent the proposed Wisloe allocation is small at £62,500. As above, if this is doubled to £125,000 it still represents a very small cost in terms of highway construction works and suggests the works themselves will be minor in nature. This reiterates the points made previously in paragraphs 2.7 to 2.10 of this Note.
- 4.6 Furthermore, paragraph 2.11 of the TFDP states that the A38 package may not be delivered as individual junction capacity improvements but instead as corridor based improvements to public transport and active travel instead.
- 4.7 This appears contrary to what is stated in the Traffic Forecasting Report and the Sustainable Transport Strategy. These documents imply they are based on the introduction of junction capacity improvements and the introduction of sustainable transport improvements along the A38 corridor, i.e., not an either / or approach.
- 4.8 The STSA clearly identifies an assumed increase in the percentage reduction in trips for the proposed Wisloe allocation from 10% to 15% based solely on public transport enhancements along the A38. The costings for the A38 package within the TFDP should therefore be increased to include both the junction capacity improvements and the envisaged public transport enhancements (including service subsidies).
- 4.9 There must also be significant uncertainty regarding the funding mechanisms and timings with the adjacent Local Authorities likely to undertake their own assessments and potentially query the respective assignments. Site promoters and developers will also inevitably undertake their own assessments of impact and seek to minimise their respective contributions.
- 4.10 Given the above, the accuracy of the TFDP and the assumed assignment of costs to individual allocations cannot be relied upon.

## **5 EB110 – Infrastructure Delivery Plan Addendum Report (August 2022)**

- 5.1 The Infrastructure Delivery Plan Addendum (IDPA) follows on from the above reports but does not introduce any new mitigation measures or further justify the provision of those identified TFRA.
- 5.2 Interestingly however, it does identify that the neighbouring Authorities and National Highways are not in total agreement with the traffic modelling work undertaken, the mitigation required, or the assignment of the costs to the proposed site allocations. For instance, Section 2.1.1 of the IDPA identifies that National Highways consider improvements are required at M5 Junction 13 yet the costs of such improvements are not identified or assigned to the proposed allocations, including Wisloe. This lack of agreement between the key delivery partners clearly leads to doubts on their ability to deliver.



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5.3 Table 24 of the IDPA summarises the items of infrastructure that the proposed PS37 Wisloe allocation would be expected to either contribute towards or deliver. For Transport and Highways, the items listed differ from those identified in the other reports reviewed above. There is no mention of contributions towards M5 Junction 14 despite this being a key part of the overall mitigation strategy for the draft Local Plan and specifically requested by National Highways. The total ‘costs’ identified are therefore inaccurate.

## **6 Summary**

- 6.1 This Note identifies issues and concerns arising from recent revisions to a number of the transport related reports prepared to support the Draft Stroud Local Plan. It follows on from a detailed review of the original versions of these reports which resulted in submission of a formal objection (dated 2<sup>nd</sup> July 2021) to the May 2021 Draft Local Plan. This Note should therefore be read in conjunction with that previous July 2021 objection.
- 6.2 The amended consultation documents do not address any of the concerns raised in the previous objection. Indeed, they compound the concerns raised previously as they assume an even greater trip transfer to sustainable modes without any justification other than a “greater level of ambition”.
- 6.3 The levels of development included within the Draft Local Plan have increased considerably both in terms of the number of dwellings and the area of employment. These larger numbers and areas will inevitably generate more traffic in the vicinity of the proposed PS37 Wisloe allocation than was considered previously yet no additional mitigation is proposed. The “greater level of ambition” for transfer to sustainable modes conveniently offsets any additional traffic although there can be no guarantee that the ‘ambition’ will be realised in part or in total. Just because SDC hope more people transfer away from the car does not mean that they will.
- 6.4 It remains that the Sustainable Transport Strategy assumes high quality pedestrian, cycle and public transport infrastructure can be provided for the Wisloe site with no evidence provided that it can. This is concerning as the now higher assumed percentage reduction in vehicle trips is predicated on just such a provision.
- 6.5 The previous objections report provided a detailed review of the issues and problems associated with the envisaged pedestrian / cycle link to the Railway Station and the proposed sustainable A4135 corridor between Wisloe and Cam. The updated consultation documents make no attempt to address these issues and problems hence their delivery cannot be guaranteed and should not be assumed.
- 6.6 Costings within the TFDP are not consistent with differing methodologies followed for the various mitigation packages. This raises considerable concern regarding their accuracy and their appropriateness for use in respect of the decision making process.

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- 6.7 The IDPA suggests differences in opinion between SDC and the neighbouring Authorities regarding the levels of traffic impact, the mitigation necessary and the assignment of costs to the proposed allocations. These differences of opinion may impact on the implementation of the Draft Local Plan even if it is adopted in its current form. Again, delivery cannot be guaranteed and should not be assumed.
- 6.8 It is maintained that, in transport terms, the Draft Local Plan allocation at Wisloe represents an inappropriate location for a development of approximately 1,500 houses and 5 hectares of employment. It is an unsustainable location which would be wholly reliant on extensive accessibility improvements which may not be possible to deliver.
- 6.9 As discussed in the July 2021 objections, alternative sites are available in locations that would reduce overall travel distances and emissions and better address the Council's Climate Emergency agenda.
- 6.10 Given the above, the Council are again respectfully invited to reconsider the Draft Local Plan and, in particular, to delete the draft PS37 allocation at Wisloe.