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Stroud District Local Plan Review Additional Technical Evidence - Limited Consultation

Dear [REDACTED]

Thank you for consulting South Gloucestershire Council (SGC) on the additional technical evidence published to support the SDC Local Plan.

Further to our Regulation 19 duly made representation dated 20th July 2021 we welcome the opportunity to provide comments to this additional consultation which we consider are relevant to the potential impacts on SGC's transport network arising from development in the Stroud Local Plan as set out in our letter of 20th July. These further comments are made in the context of the ongoing cross boundary collaboration and joint working with SDC to support Local Plan development in both Stroud and South Gloucestershire.

With regard to the SDC additional technical evidence, SGC has commented on the following documents:

- EB 98 Traffic Forecasting Report Addendum
- EB108 Sustainable Transport Strategy Addendum
- EB109 Transport Funding and Delivery Plan
- EB112, a, b, and c SALA Accessibility Scoring Note and Transport Accessibility

In providing these comments we welcome the opportunity to continue to discuss these issues in more detail with National Highways and SDC through the M5 Junction 14 working group and related discussions. The council would also welcome the opportunity to be invited by SDC to prepare a new Statement of Common Ground (SoCG) once you have had an opportunity to consider our response to this consultation, given that key circumstances and events have now substantially changed since the previous SoCG was agreed on 20th October 2021.

In summary our response relates to

- 1) West of England Combined Authority stopping work on the Spatial Development Strategy
- 2) The cost of improving M5 Junction 14, and
- 3) The Apportionment of costs
- 4) Developer funding to support Charfield Station project and Wotton-Charfield-Kingswood Greenway project

1. West of England Combined Authority stopping work on the Spatial Development Strategy and status of the South Gloucestershire new Local Plan

At our regularly held strategic planning liaison meetings, South Glos has previously communicated to SDC that following the decision of the WECA Mayor on 9th May to stop all work on the West of England Combined Authority Spatial Development Strategy (SDS), the strategic planning framework for South Gloucestershire is now to be provided through its Local Plan. The absence of a SDS has, in effect, left SGC without up-to-date strategic or housing policies. However, South Gloucestershire as a Local Planning Authority (LPA) under s.17(3) of the Planning and Compulsory Purchase Act 2004 (PCPA), is under a duty to set out, in local development documents¹, policies relating to the development and use of land in their area. Furthermore, section 19 of the PCPA requires LPAs to identify and set out strategic policies in their respective development plan documents. In accordance with Regulation 18 (1) of the Town and Country Planning (Local Planning) (England) Regulations 2012, South Gloucestershire Cabinet at its meeting on 10th October reconfirmed its intent and commitment to prepare a new Local Plan (SGLP) and for this to be undertaken without delay. The new SGLP will be a development plan document (DPD) covering the whole administrative area of the district for the plan period 2025 to 2042. The new Local Plan timetable and programme and is available on the Council's website at: [Local Plan Delivery Programme | BETA - South Gloucestershire Council \(southglos.gov.uk\)](https://www.southglos.gov.uk/local-plan-delivery-programme-beta-south-gloucestershire-council).

In order to ensure SDC base their infrastructure funding and delivery proposals on best available 'real world' information, South Glos would seek assurance from SDC that in confirming the reasonable prospect that the infrastructure funding needed to deliver the new junction can be secured in the way envisaged by SDC, the calibration and calculations used for their technical evidence appropriately take account of the material impacts of the significant change of context created by the WECA Mayor stopping all work on the SDS and for South Gloucestershire needing to reset its Local Plan timetable and programme which can be summarised as follows:

- WECA will not be bringing forward an SDS
- South Gloucestershire has updated its LDS confirming a new Local Plan timetable
- The local housing need for South Gloucestershire as established by the Standard Methodology is a minimum of 28,000 dwellings (c1400p/a) over the period 2022-2042
- Currently some 16,000 homes have planning consent in South Glos and comprise the Council's current housing trajectory over the period 2022 to 2042
- The South Glos Local Plan 2022 to 2042 is at a developmental stage. Regulation 18 consultation is due to commence in Autumn 2023. Accordingly, at this time there is no certainty as to the spatial distribution of future growth needed to meet South Glos housing needs beyond that allocated in the Council's adopted Core Strategy and consented applications as shown on the Council's published Housing Trajectory [Local plan monitoring | BETA - South Gloucestershire Council \(southglos.gov.uk\)](https://www.southglos.gov.uk/local-plan-monitoring-beta-south-gloucestershire-council)
- The land promoter/ developer 'Call for Sites' submitted to the South Glos provides no certainty that a specific quantum of growth will be allocated within a geographically area relevant to J14.
- South Glos and its strategic partners have made no commitments to fund and deliver a new J14 and this is currently not an infrastructure project the council is currently actively seeking to deliver through either its adopted Core Strategy of its new Local Plan.

¹ Local development documents consist of both development plan documents and other types of policy document, for example supplementary planning documents. This advice is only concerned with development plan documents.
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These matters remain the basis of the Council's ongoing objection to the SDC Local Plan that the reasonable prospect that the infrastructure funding needed to deliver the new junction cannot be secured in the way envisaged by SDC. We would welcome continuing to work with SDC through preparing a new SoCG to resolve and agree a shared position on this matter.

2. M5 J14 Junction improvement costings (EB109)

The junction improvement can broadly be described as a significant upgrade from a single over-bridge junction design to a two-bridge roundabout solution.

Document EB109 sets out high level costing for the junction. Further detail is provided in a Bill of Quantities spreadsheet prepared by Stroud District Council's consultants AECOM and which was separately shared with SGC.

The cost estimate prepared by AECOM in support of the Stroud Local Plan sets out a headline cost for delivering the junction upgrade of £27M, inclusive of the dualling of the B4059 between the motorway junction and the A38. This estimate appears to be very low when compared to a cost estimate prepared by F&G on behalf of WECA in February 2018 (nearly five years ago) which estimated a headline cost of £59m for a similar junction upgrade at Junction 14 of M5. It is also understood that the M49 junction in Severnside, also utilising an existing bridge as part of its solution, cost £50M or thereabouts in 2017 prices. These costs we feel are more robust and are at a level where additional funding from either local, regional, or national, funding sources would be required to fund the majority of the scheme costs.

SGC note the AECOM/Stroud cost estimate includes a number of exclusions, notably:

- No allowance for inflation
- No allowance for land acquisition and associated fees
- No allowance for surveys costs, supervision costs and temporary works
- No allowance appears to have been made for project management and programme management costs

South Gloucestershire Council consider the sum of the above is likely to be substantial, particularly with inflation at the current high level. Accordingly, these elements are likely to be a contributing factor in the discrepancy between the SDC £27M cost estimate for the junction and the costings from examples we have cited above.

It should be acknowledged by all parties that a significant underestimate of the costs of the junction upgrade represents a real risk to the delivery of Stroud Local Plan, were funding for the junction not to be realised. It is our understanding the quantum of development proposed by the Stroud DC Local Plan is dependent on the junction upgrade.

To address this, we would encourage Stroud DC and National Highways to undertake a benchmarking exercise of similar junction upgrades to enable agreement with all parties of an up-to-date cost estimate. This exercise will help to inform if there is a shortfall in funding and to establish how the shortfall could be met. We would also welcome further discussions with AECOM and Stroud to review these matters.

Subject to this concluding, we consider the need for further certainty on the junction costings to be a matter which South Gloucestershire continues to raise as a matter of objection to the SDC

Local Plan and which we would need to continue to work with SDC through preparing a new SoCG to resolve.

3. The Apportionment of Infrastructure Costs– (EB109)

Document EB109 sets out a proposed cost-sharing arrangement for M5 J14 & works to the A38 in Stroud District.

It is noted that apportioning a share of costs to development in Stroud and development in South Gloucestershire is fully dependent on knowing with a high degree of certainty the levels of development in each authority area. Moreover, the inference from the modelling work and subsequent apportionment is that new development sites within South Gloucestershire would need to generate four times the influence of the Stroud sites to meet the suggested split. Consequently, it's our current understanding that the impact of trips generated by yet to be identified development sites in South Gloucestershire that SDC are placing significant weight and certainty on in relation to calculating financial contributions that would need to be achieved to fund the totality of the junctions build costs, noting this is at the SDC cost estimate of £27m rather than the alternative build costs of c£50M as we have suggested may be a more realistic cost estimate.

This is not the position supported and held by South Gloucestershire Council for the reasons set out below.

As of October 2022, the level of proposed development in Stroud District is understood. However, the levels of development in the in the northern arc of South Gloucestershire (Thornbury, Charfield etc.) is unknown, and will not be established until the South Gloucestershire Local Plan is progressed to Regulation 19 Submission, which the Council Local Development Scheme identifies as May 2024

It is recognised that the levels of proposed development in Stroud DC area are substantial. We anticipate the following proposed developments would make use of the junction & A38:

- 2,400 homes at Sharpness (particularly for southbound journeys)
- 300 homes at Sharpness docks (particularly for southbound journeys)
- 2,580 new homes at Cam/Wisloe/ Slimbridge (particularly for southbound journeys)
- Site PS47 employment adjacent to Renishaw New Mills (north and southbound journeys)
- Plus, local development sites (e.g., Kingswood)

The totality of the development above is significant in terms of the impact on the motorway junction & the A38. SGC has previously highlighted our concerns (at Regulation 18 and again at Regulation 19 stage) about the viability and the deliverability of the public transport improvements associated with some of the above development proposals (e.g., reopening the Sharpness branch line and station for passenger services) and without confidence of deliverability, the impacts on Junction 14 & the A38 would be exacerbated.

The outcome of these applied assumptions South Gloucestershire Council understands is that the forecasting work presented in EB98 presumes:

- First that significant development levels located from development sites which are yet to be brought forward across the 'northern belt' of South Gloucestershire running in a broad arc from Thornbury to Charfield, are explicitly relied upon by SDC to support the delivery and funding of the J14.

- Secondly, that it is recognised and accepted by SDC that this method and approach forms and justifies the basis of the SDC position that there is a reasonable prospect that the junction upgrade can be funded and delivered.

Whilst we would agree the principle of an apportionment approach if influencing development was to come forward through the Local Plan in South Gloucestershire, further discussions with all parties on this matter to take forward an agreed approach to funding apportionment are clearly necessary. In response to the proposed 80/20 & 40/60 (South Gloucestershire/Stroud) M5J14 & A38 works funding apportionment respectively outlined in EB109, and in the absence of knowing with any degree of certainty the South Gloucestershire Local Plan housing development allocations, it is considered to be unrealistic at this stage to make such apportionment assumptions and to seek to use this approach to demonstrate that there is a reasonable prospect that the funding and delivery can be secured in the way envisaged by SDC for the new junction.

Accordingly, the Council continues to raise the proposed cost-sharing arrangement for M5 J14 & works to the A38 made by the SDC Local Plan as a matter of ongoing objection to the SDC Local Plan.

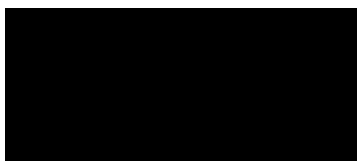
4. Developer funding to support Charfield Station project and Wotton-Charfield-Kingswood Greenway project

The current draft Stroud Local Plan (page 206) sets out a funding commitment for site PS47 to contribute towards the above sustainable transport schemes. Contributions should therefore be set out in EB109 in the same way that contributions towards highway schemes have been provided.

We look forward to receiving further detail from Stroud DC on this matter through preparing a new SoCG.

In Summary, South Gloucestershire Council has raised concerns regarding the technical evidence published for consultation on 27th September and which SDC seek to rely on to justify the reasonable prospect that the funding and delivery of their Local Plan spatial strategy can be achieved in a sustainable way. South Gloucestershire Council has put forward recommendations to resolve these matters and would welcome continuing to work with Stroud District Council to resolve these matters through agreeing appropriate modifications which can be secured through a SoCG ahead of examination in public commencing. Subject to this, the matters remain unresolved and points of objection at the current time.

Yours sincerely



Strategic Planning Policy and Specialist Advice Team Manager