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Via email:

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21 October 2022

Dear Planning Strategy Team,

STROUD DISTRICT LOCAL PLAN REVIEW: ADDITIONAL TECHNICAL EVIDENCE - LIMITED CONSULTATION

Thank you for your email dated 27 September 2022 inviting National Highways to comment on technical documents relating to transport, infrastructure and viability, and background evidence for the Stroud District Local Plan Review (SDLP). We understand that this is in response to a request from the Planning Inspectors, whereby those who submitted comments during the Regulation 19 consultation have been given the opportunity to formally comment on this additional evidence.

National Highways is responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the SDLP area comprises the M5 Junctions 12 and 13, and also M5 Junction 14 which, although in South Gloucestershire, is affected by development located in Stroud's District.

The purpose of the SRN, which is a critical national infrastructure asset, is to provide a safe, free-flowing and reliable highway network for strategic movements to support economic growth. It is on the basis of these responsibilities that National Highways has provided the comments that follow in this letter.

The Role of National Highways in Plan Making

National Highways is keen to ensure that policy takes account of transport and land use planning to be closely integrated. In this respect, National Highways draws your attention to DfT Circular 02/2013, which sets out how we will engage with the planning system to deliver sustainable development.

National Highways recognises that prosperity depends on our roads. It aims to support growth and facilitate development based on an understanding of traffic conditions and behaviour to manage the effects of development and ensure road safety.

To constructively engage in the local plan-making process, we require a robust evidence-base so that advice can be given to local planning authorities on the appropriateness of proposed development in relation to the SRN. This also extends to include the identification of transport solutions that may be required to mitigate adverse impact on the SRN and support the delivery of sustainable economic growth across the Plan area.

Paragraph 12 of Circular 02/2013 states that *'The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.'*

Paragraph 15 states that *'In order to develop a robust transport evidence base [for local plans], the Agency [now National Highways] will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety.'*

Paragraph 18 states that *'Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency [now National Highways] will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.'*

Responses to Local Plan consultations are also guided by other pertinent policy and guidance, notably the National Planning Policy Framework (NPPF) and the 'Highways Agency [National Highways] and the Local Plan Process' protocol.

During our engagement with the District Council, we have discussed the current performance of the SRN within and just outside of Stroud's authoritative boundaries which needs to be considered in the evidence base supporting the SDLP. SRN junctions on the M5 in Stroud and neighbouring South Gloucestershire are already constrained at peak times, resulting in significant queuing and delay which can extend onto the motorway mainline. In accordance with DfT Circular 02/2013 and NPPF, National Highways would take the view that any development adding trips to an off-slip which then results in mainline queuing, extends a mainline queue, and/or increases the frequency at which a mainline queue occurs will have an unacceptable safety impact on the SRN due to the increased risk of vehicle shunt collisions on the mainline.

National Highways and Stroud District Council Meetings

National Highways has been engaging positively and collaboratively with Stroud District Council (SDC) throughout its SDLP Review period. We have established a quarterly series of Local Plan Transport Group meetings and, separately, Planning Liaison meetings with SDC. In addition, we attend quarterly meetings focused on M5 Junction 14 jointly with SDC and South Gloucestershire Council. These meetings have supported helpful discussions on the technical documents

produced by SDC in collaboration with all parties. We are appreciative of the work undertaken to date and look forward to continued engagement with SDC to address outstanding matters.

Traffic Forecasting Report (Examination Library Reference Number EB98)

National Highways is content that, as a technical transport modelling report, the 2022 Traffic Forecasting Report Addendum (TFR) is appropriate, and the analysis and assessment contained within the report is a fair interpretation of the SATURN model outputs.

Improvements to M5 Junction 13 are specified to accommodate the impact of the Eco Park M5 Junction 13 strategic site allocated under Policy PS20 - Stonehouse.

Larger strategic improvements at M5 Junctions 12 and 14 are required to safely accommodate the impact of developments across the Plan area.

National Highways is satisfied of the need for interventions at M5 Junctions 12, 13 and 14 to enable the delivery of the SDLP.

Infrastructure Delivery Plan Addendum (Examination Library Reference Number EB110)

We welcome Appendix A of the Infrastructure Delivery Plan (IDP) Addendum that details the funding contribution towards SRN infrastructure to be sought from respective Local Plan development allocations. However, we are currently not satisfied that the IDP Addendum has explicitly detailed the SRN schemes as critical infrastructure. In “Table 1 Highway Mitigation extract from Aecom Mitigation Review”, M5 Junctions 12 and 13 are included as interdependent or associated schemes for delivery of the Local Plan, but they are not explicitly listed in their own right. In addition, M5 Junction 14 is not mentioned at all. We would welcome further engagement to ensure that the IDP is revised to be consistent with the TFR.

Pre-Submission Draft Plan Regulation 19 Consultation

In July 2021 National Highways submitted a response to the SDLP Review: Pre-Submission Draft Plan (Regulation 19 Consultation) May 2021.

At present, we consider there to be a disconnect between the findings of the Traffic Forecasting Report (TFR) and Infrastructure Delivery Plan (IDP), and the policy commitments contained within the Pre-Submission Draft SDLP.

We recommended that site allocation policies and Delivery Policies within the Draft SDLP should be strengthened to clearly signpost the need for improvements at M5 Junctions 12, 13 and 14 and that the improvements indicated are linked to site allocations that are likely to impact on the SRN.

SDLP should clearly highlight where improvements are necessary to the SRN to support safe and sustainable growth. This is important in the context of NPPF 2021 paragraph 35 to demonstrate that funding will be available for SRN improvements to support their delivery over the SDLP period in order to be considered ‘**effective**’.

We also stated that the Pre-Submission Draft SDLP should set out how the delivery of proposed development will be managed to ensure that necessary infrastructure is in place to prevent a severe or unacceptable safety impact on the SRN.

Whilst we are pleased to see that improvements to the SRN are referenced in the TFR and IDP, the need for their timely delivery to mitigate adverse impact on the SRN and support the delivery of sustainable economic growth across the SDLP area was not clearly signposted in the Pre-Submission Draft SDLP. We recommended that development management and site allocation policies should be strengthened to ensure that development comes forward in line with the availability of necessary transport infrastructure. We note Examination Library Reference Number CD1 is the Pre-Submission Draft SDLP and has not yet been updated to reflect our comments. We request that all relevant documents are reviewed to clearly state the need for and to support the timely delivery of SRN junction improvements needed to enable the SDLP.

Stroud Sustainable Transport Strategy Addendum (Examination Library Reference Number EB108)

National Highways is content to accept the Sustainable Transport Strategy (STS) Addendum (May 2022).

General Comments

As mentioned above, National Highways has welcomed the regular and proactive engagement with SDC in the preparation of the SDLP evidence base. However, we consider that there are matters which need to be addressed. We have outstanding concerns with the **Transport Funding and Delivery Plan** (Examination Library Reference Number EB109).

We provide the following comments on the SDLP and its evidence base presented to date:

1. National Highways agrees to the need for mitigation and of the scale of respective improvements identified at M5 Junctions 12, 13 and 14.
2. National Highways agreed a draft Statement of Common Ground (SoCG) with Stroud District Council in October 2021 and looks forward to progressing an update to the document. We anticipate that the final SoCG will recognise the need for SDLP policies and delivery plans to provide for and enable improvements to the SRN junctions to support the SDLP development site allocations. This will provide assurance to National Highways that SDC is committed to bringing the necessary infrastructure forward in line with the proposed growth aspirations, and recognises the importance to maintain the safe and effective operation of the SRN, specifically at M5 junctions 12, 13 and 14.
3. National Highways is concerned that at present traffic impact and mitigation analysis is only presented for the end of the SDLP period, i.e. 2040. No evidence has been provided for interim years or to indicate the timing of or triggers for mitigation that would indicate when a respective SRN scheme is required. This evidence should be provided to assure the Inspector that the plan satisfies NPPF paragraph 35 to show that a local plan and its proposed mitigation are **justified** as part of an appropriate strategy and are **effective**. If this is not provided, it is requested that the policy is updated to include a statement which sets out that Transport Assessments for the allocated sites will need to identify 'when' the schemes are required.

4. National Highways is unsighted of and seeks clarity on development assumptions and housing and employment numbers and locations in neighbouring LPA areas, notably South Gloucestershire, Gloucester, Tewkesbury and Cheltenham and used in the SDLP traffic modelling. The location of an allocation, its size and proximity to an SRN junction could have an impact on the size and scale of the improvements required. The withdrawal of the West of England Combined Authority Strategic development Strategy (SDS) adds further uncertainty to traffic modelling development assumptions. This clarification will support the requirements of NPPF paragraph 35 and demonstrate the SDLP mitigations are **justified**. There is some concern that without clarity on the plans detailed above the assumptions made regarding the SRN may be variable.

National Highways has some concerns regarding the Transport Funding and Delivery Plan (TF&DP) as follows:

5. We are not currently satisfied that the funding and delivery plan is **effective** (as per NPPF paragraph 35) given its reliance on third party (development) cumulative contributions and the significant proportion of the costs being sought from developments in neighbouring LPAs.
6. Although we support the principles behind the TF&DP, it does not identify a delivery mechanism nor any contingency should funding from any development not become available or allocations vary at the adoption stage. Noting that the Plan makes a passing reference to external funding sources, such as Homes England, which may be available to unlock housing growth should there be a funding shortfall. This could mean that an SRN scheme and therefore the SDLP, may become undeliverable. National Highways commits to continued working in collaboration with SDC and neighbouring authorities to explore funding opportunities and delivery routes for necessary SRN infrastructure improvements and we make the following comments on the TF&DP.
7. National Highways has not had sight of any Statements of Common Ground underpinning the TF&DP assumptions. This is especially important given the significant proportion of funding contributions required from neighbouring LPAs at M5 Junctions 12 and 14. We welcome further discussion with SDC on this point to provide comfort regarding the assumptions underpinning the funding arrangements for these SRN schemes.
8. The TF&DP (p.14, para.6.5) states that “National Highways is considering an interim scheme for M5 Junction 14, which would potentially provide additional capacity to accommodate growth for a number of years.” This is not the case. To clarify, National Highways’ Spatial Planning team has been undertaking modelling to determine whether the cumulative impacts of traffic arising from speculative developments affecting M5 Junction 14 are proposing appropriate mitigations and whether a further interim improvement would be beneficial in the medium or long term. These results have been shared with SDC and neighbouring authorities in confidence. However, this remains as a spatial planning study for the purposes of clarifying National Highways’ response to planning applications. The study has no wider status within National Highways and it currently has no plans or proposals for any improvement at M5 Junction 14.
9. National Highways does not consider that the estimated scheme costs at M5 Junctions 12 and 14 are at current market value. Therefore, as the TF&DP are based upon these estimates we consider that this is a risk to the deliverability of the SDLP because if a scheme is undervalued it cannot be delivered at the figure identified. In its current form the costings in the TF&DP raise deliverability and viability concerns to National Highways. Hence, we seek

to work with SDC to understand the assumptions and costs associated with these schemes in order to ascertain a revised current market value for the schemes to ensure that both SDC and National Highways have comfort in the estimates provided that support the SDLP.

10. SDC has only demonstrated through *strategic* traffic modelling that improvements to SRN junctions might provide a solution to the issues caused by increased traffic from the additional development in the SDLP and from surrounding LPAs. There remains a need to indicate that proposed improvements are viable and ultimately deliverable and that the proposed mitigation can be considered '**effective**' as per NPPF paragraph 35.
11. It is not clear *when* improvements at M5 Junctions 12, 13 and 14 will be required before the end of the SDLP period (2040), and who would decide the timing of their delivery. National Highways anticipates that the improvements would be required early in the SDLP period. Within any forthcoming SoCG we seek to confirm that SDC and National Highways commit to collaborating on further testing early in the SDLP period to feed into a phasing plan in order to resolve this question.
12. It is not clear who the scheme promoters would be and who would underwrite any financial risks for improvements at M5 Junctions 12, 13 and 14.

National Highways commits to working collaboratively and proactively with SDC and neighbouring authorities to explore delivery routes for necessary SRN infrastructure improvements. We look forward to updating the SoCG and to continue engagement with SDC throughout the SDLP process to ensure that development proposals which are likely to impact on the SRN are supported by a proportionate and robust transport evidence base.

Yours faithfully,

[Redacted signature]

[Redacted name]

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