



STROUD DISTRICT COUNCIL

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By email

19th January 2024

Dear Ms Lucas and Ms Wright,

Stroud District Local Plan Review Examination

Thank you for your letter dated 18th December 2023 and for confirming you are still considering the responses and information received to date. We understand from your letter that you still require Stroud District Council (SDC) to provide clarity on a few remaining queries. This response will address those queries.

SDC confirms that the Joint Action Plan (JAP) programme is 32 weeks (approximately 7 months), marginally longer than initially envisaged by SDC. This longer programme is required owing to the need for additional time requested by JAP parties to undertake actions. It is important to note that significant progress has been made by SDC and the parties in agreeing the JAP, and committing the resources required to deliver it.

The work to deliver the JAP is reliant on confirmation that a pause to the Examination will be agreed to. As such, work to date has been focused on agreeing the methodology, task list, programme and resources. However, it has not been possible to commit the public funds required to commence the JAP, without certainty on the pause in Examination. SDC respectfully request that this can be confirmed by the Inspectors at the earliest opportunity, in order to enable SDC, GCC and NH to commence the JAP.

SDC also acknowledges the Inspectors request for additional public consultation as a result of additional evidence and outputs of the JAP. SDC agree that a consultation limited to the JAP outputs are appropriate and support this request. As the draft Local Plan is still at Examination, SDC would require the Inspectors to set the parameters of the consultation. On the assumption of a 6-week targeted consultation, SDC consider a 3-month time period is realistic to deliver this.

Joint Action Plan Clarification

SDC welcomes the Inspectors comments regarding the progress that has been made with this work and that they are encouraged by the joint working that has taken place in producing it.



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The JAP is ambitious due to the urgency of the task, but also achievable as it has the committed resources and responsibilities agreed, as well as the senior level support to drive it forwards. The JAP is focused on the outcomes to be achieved, which includes developed schemes for the junction improvements and the accurate costings. Importantly, the outcomes in the JAP are for deliverables to be both produced and agreed between the relevant parties.

In relation to the funding of the Strategic Road Network (SRN) improvements, the JAP programme will identify and agree the most appropriate avenue for future funding (see under '*Impact Assessment and Funding & Cost Apportionment Exercises*'). The JAP programme will also provide much of the background work required to progress funding bids, and this is understood amongst the JAP delivery partners.

Identifying 'Non-IDP' Sites

The JAP outlines that NH (in partnership with SDC) will undertake "*interim year modelling of updated housing trajectory and threshold / trigger point testing*" for the SRN improvements. This modelling will identify a 'trip envelope' which can be delivered prior to mitigation schemes being required. SDC has been working with NH on the parameters for this assessment and can confirm that it includes testing the delivery of non-IDP sites in line with the housing trajectory, without development coming forwards from IDP schemes. Thus, SDC will continue to work in partnership with stakeholders to develop the list of non-IDP sites which could come forward within this trip envelope.

We note technical queries raised in paragraph 12 of the 18/12/23 letter and seek to address these below. However, it is important to note that SDC considers that the modelling undertaken for the Local Plan is proportionate to the stage of the planning process. More in depth modelling has been requested by NH to build on the evidence base and verify, which has been agreed by all parties and incorporated into the JAP. Importantly, this additional agreed work will enable agreement to be reached between all parties, within the time frame of a requested Examination pause. This will provide further confidence in the evidence base and will effectively supersede some of these technical points.

In relation to the specific queries raised by Inspectors in relation to the impact apportionment / modelling exercise which has been undertaken in relation to the non-IDP sites, SDC provides the following response:

- **Paragraph 12i** – This is correct, with the majority of the non-IDP sites individually representing significantly less than 5% of Local Plan traffic forecast to use either J12 or J14. The Technical Note (dated 16/10/2023) provided, presents the cumulative level of traffic of all the non-IDP sites. For the avoidance of doubt, SDC



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is not proposing a 5% threshold for when site allocations will be required to contribute to the delivery of SRN improvements. All sites which are demonstrated to impact on the SRN will be required to contribute proportionately and in accordance with relevant policies. The Funding and Delivery Plan included the 5% threshold as a measure to build robustness into the viability testing to ensure that the Funding and Delivery Strategy could come forward without relying on contributions from small-scale sites (i.e. those with a <5% impact). The rationale for this approach has been explained fully through Matter 11.

- **Paragraph 12ii** - The modelling includes an assessment of the impact of all Local Plan allocations, and the suitability of mitigation to accommodate this. From this modelling, SDC has extrapolated the level of traffic flows arising from IDP and non-IDP sites, specifically at the SRN. SDC considers that a suitable gauge as to the level of impact from these allocations is available based on the modelling undertaken to date. Undertaking additional strategic modelling of combinations of Local Plan allocations, rather than the Plan as a whole, would have been disproportionate. The impact apportionment exercise (as outlined in the Technical Note dated 16/10/2023) concludes that the traffic flow increase above the baseline resulting from the non-IDP residential sites is significantly less than 10%, and therefore represents a change in traffic demand which is well within the day-to-day variation of that currently experienced at each junction (in accordance with IEMA Guidance 'Environmental Assessment of Traffic and Movement', 2023). It was therefore not considered proportionate or necessary to model combinations of sites on the SRN, not least the non-IDP combination of sites. Notwithstanding this, the JAP includes this additional level of modelling, which will address the questions posed.
- **Paragraph 12iii** - The level of traffic demand from the non-IDP sites has been identified using the outputs of the 2040 future-year strategic modelling as included in the Local Plan evidence base. This modelling includes the capacity enhancements to the SRN junctions as would be delivered by the IDP sites. SDC cannot agree with the Inspector's conclusion that this approach is a "serious flaw" in the assessment approach. The purpose of the exercise is to identify the level of traffic demand for the SRN junctions from Local Plan sites, which has then been disaggregated between IDP and non-IDP sites. It is important to note that were a scenario without the capacity enhancements at the SRN junctions to have been used for this, then this would have underestimated the level of traffic demand at the junction. If the capacity improvements were not included then the strategic model would have assigned the traffic away from these locations, due to congestion and delay, and towards alternative routes with lower journey times. Therefore, the inclusion of the IDP improvements to the SRN (and as a whole)



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were necessary to ensure that traffic was assigned towards these junctions, rather than demand being suppressed, and to demonstrate a realistic impact. It would be possible to undertake the exercise using the 2040 modelling scenario with the Local Plan sites, but without the mitigation schemes. However, based on conversations with NH, it is unlikely that conclusions from this would be accepted, particularly as a more in-depth modelling exercise has been agreed to and committed within the JAP, in order to move the issue forwards.

- **Paragraph 12iv** - The assessment was undertaken to provide an indication of housing trajectory which could be delivered without reliance on SRN mitigation schemes, as was requested at the Matter 11 Hearing. The non-IDP sites, i.e. those which SDC considers could come forwards in advance of SRN schemes, do not include employment allocations, except where there is an employment element included within a larger residential allocation. Many of the employment sites are acknowledged by the IDP, and as such would assist in delivering the SRN improvements as / when they come forward. The development of other employment sites would be managed through the Development Management process. The trigger modelling being undertaken by NH within the JAP programme will provide a trip envelope which can be accommodated prior to the implementation of capacity enhancements at J12 and J14. This trip envelope could accommodate either housing or employment development as required. As discussed above, SDC will continue to work with key parties to identify the sites which could come forward within the early stages of the Local Plan period accordingly.

In addition to the above, the issues which have been identified in paragraphs 15 to 17 of the Inspector's letter will all be addressed through the additional modelling to be undertaken through the JAP programme, including the trigger modelling to be undertaken by NHs for J12 and J14 which will identify when the need for the capacity enhancements will be. This modelling will be undertaken using NHs preferred software (Vissim), providing further detail on the impacts across the AM and PM peak hour and across all arms of the model network (including motorway and non-motorway links). It is also understood that GCC are suggesting to undertake additional modelling of the proposed capacity enhancements at J12 (see under 'Design and costing – M5 J12 (GCC / Atkins) - Modelling of preferred option to confirm performance - utilising NH approved Vissim model for J12'. This will also address the technical questions which have been identified.



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The concerns in relation to the modelling raised by GCC and NH are being taken seriously, SDC is working with GCC and NH to resolve the concerns. Importantly, the tasks required to address these concerns have been agreed and are included in the JAP and agreed by all parties. SDC's defence of the modelling work undertaken to date should not be construed as otherwise. The modelling undertaken for the Local Plan has been agreed with GCC and NH, as evidenced through the SoCGs, and is not under question. The areas of further discussion have been around additional evidence and requests for additional modelling. Whilst SDC highlights the importance of proportionality at this stage of the plan making process, the additional work has been agreed and is committed through the JAP. We draw the Inspector's attention to the significant progress made in the JAP, which will address many of the concerns raised, and the significant level of resource committed to this process by SDC, which is not the LHA for either of the SRN junctions. This demonstrates that concerns are not being taken lightly.

SDC is confident it has now addressed all the outstanding queries the Inspectors have raised with the JAP and is working with all parties to deliver a sound Local Plan. SDC requests that the Inspectors now confirm if they are prepared to grant the required pause to allow work on the JAP to fully commence and the Examination to progress.

Yours sincerely



Kathy O'Leary
Chief Executive