

Via email: Planning Strategy Team

Spatial Planning South West
Highways England
Brunel House
930 Aztec West
Bristol
BS32 4SR

Direct Line: 0300 4704303

16 January 2019

Dear Planning Strategy Team,

**STROUD DISTRICT LOCAL PLAN REVIEW EMERGING STRATEGY PAPER
NOVEMBER 2018**

Highways England welcomes the opportunity to comment on the Stroud District Local Plan Emerging Strategy Paper November 2018 (ESP). As you will be aware, we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises parts of the M5, particularly junctions 12 and 13, with junction 14 located just beyond the administrative boundary. It is on the basis of these responsibilities that the comments that follow in this letter have been made.

We are generally interested in the potential traffic impacts of any development site proposals and/or policies coming forward through the Local Plan and need to ensure that these are fully assessed during the plan-making stage. It is imperative to identify any improvements needed to deliver aspirations at this early stage, as set out in Government policy.

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 Highways England) 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 Highways England) 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, namely the NPPF and the ‘Highways Agency and the Local Plan Process’ protocol – now applicable to Highways England.

The National Planning Policy Framework 2018 (NPPF) sets out that plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees. (para 16).

Transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impact of development on transport networks can be addressed. (para 102).

The planning system should actively manage patterns of growth such that significant development is focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. (para 103).

Planning policies should be prepared with the active involvement of highways authorities and other transport infrastructure providers so that strategies and investments for supporting sustainable transport and development patterns are aligned. (para 104).

Planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use. (para 122).

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. (para 109).

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (including transport). Such policies should not undermine the deliverability of the plan. (para 34)

Highways England's protocol document entitled "The Highways Agency and the Local Plan process - A Protocol for Local Authorities, Developers and the Highways Agency" confirms that Highways England will work with local planning authorities to identify the infrastructure requirements of the overall allocation.

In summary; in order for the transport evidence base to satisfy the requirements of NPPF and Circular 02/2013, it is necessary to establish:

- The transport impacts of the development allocations.
- The improvements necessary to ensure that the impacts are not severe.
- Any land required for the delivery of the necessary improvements
- The cost of the necessary improvements.
- Any other deliverability constraints.

Paragraphs 9 and 10 set out the approach that Highways England takes in relation to development proposals as follows:

"9. Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

10. However, even where proposals would not result in capacity issues, the Highways England's prime consideration will be the continued safe operation of its network".

Applying the principals of paragraph 9 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section that is already operating at over-capacity levels, or cannot be safely accommodated, i.e, a development which adds traffic to a junction which already experiences road safety issues; would increase the frequency of occurrence of road safety issues; or would in itself cause those road safety issues to arise, would be considered to have a severe impact.

Our comments relating to the Options Consultation are as follows:

Context

The Stroud District Local Plan identifies the housing and employment need, along with the strategy for distributing it across the Plan area to 2031. Stroud District Council (SDC) started the process of reviewing the current Plan in 2017, with a public consultation on the Issues and Options during the Autumn. The ESP sets out the

emerging strategy for meeting development needs to 2040, but also presents some potential alternative options. The purpose of this stage of the consultation is to understand if the main issues and needs across the Plan area have been identified, and to gauge the level of support for the emerging strategy or alternative approaches.

1. Key Issues

Question 1.0a and 1.0b: Have we identified the top 5 issues for you? Do you agree with the ways we intend to tackle these issues?

We welcome the suggestion that the ESP will seek to address the need to ensure new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development.

We note that to achieve this, the strategy will seek to locate new development where good access to jobs and services already exists or where the proposed scale of development would 'transform' the available existing access to services and provide the means and justification to improve infrastructure provision to provide access to a wider range of services. We also note that it is proposed to concentrate employment growth along the A38/M5 corridor and at locations in tandem with housing growth.

The ESP recognises that there is already pressure on all the motorway junctions through Gloucestershire, particularly at peak times. M5 junction 12 experiences mainline queuing as a result of queues extending back from the junction off-slips. This means that current planning consents are subject to Grampian-style planning conditions to secure safety improvements at the junction prior to further development in the area.

M5 junction 13 will require some minor improvement works should the current Ecotricity application be approved. The pressure on these junctions not only arises as a result of traffic accessing or egressing the motorway, but also traffic using the junctions as a means of crossing the motorway.

In nearby South Gloucestershire, M5 junction 14 is identified in the emerging West of England Joint Spatial Plan as requiring a substantial upgrade to safely accommodate future planned growth. The importance of M5 junction 14 for the southern area of Stroud District is also recognised in the ESP. The junction currently experiences mainline queuing as a result of the junction not being able to accommodate the current traffic demand in the network peak periods.

In terms of location, employment development often contributes significantly to peak hour traffic, and hence there can be challenges to accommodating high levels of trip demand, which may only exist for limited periods of the day, on the SRN. The attraction to business of locating in highly accessible locations is recognised, and we are aware that many businesses would like to be located close to the SRN. Indeed, for some businesses, close proximity to the SRN is essential.

Thus, the location of employment sites is as important to Highways England as the location of housing sites.

When considering the location and associated supporting infrastructure for new housing and employment areas, we note that the SRN should not be considered as an alternative to providing improvements to the existing local road network. These improvements should include the planning of adequate highway infrastructure to provide for local movements, thereby maximising the ability of the SRN to serve strategic movements to and from Stroud for residential based, freight journeys and business travel. Excessive use of the SRN for local movements impacts on the performance of the SRN and hence its ability to support wider ambitions for economic growth in the Plan area and across Gloucestershire.

It is our expectation that the local planning and highway authority will look to strengthen and improve local highway connections to facilitate proposed growth, alongside maximising the opportunity for sustainable travel, before testing potential mitigation options comprising significant upgrades to the SRN. The purpose of the SRN is to provide a safe, free-flowing and reliable highway network for strategic movements to support economic growth. If the SRN is used for significant numbers of local trips, the SRN cannot fulfil its purpose and hence local growth could be constrained. We would welcome the opportunity to work with the local planning and local highway authorities to develop the local highway network to support the SRN.

2. Needs

Question 2.1a and 2.1b: Do you agree with the ways in which the emerging Strategy intends to support the local economy and the creation of jobs? Do you support an alternative approach? Or have we missed anything?

Regarding the local economy and job creation, the ESP will seek to deliver “*economic growth and additional jobs on and adjacent to existing high value employment sites and within the M5/A38 corridor*”.

As set out above, when considering the location and associated supporting infrastructure for new employment areas, we note that the SRN should not be considered as an alternative to providing improvements to the existing local road network for journeys to and/or from work. These improvements should include the planning of adequate highway infrastructure to provide for local movements, thereby maximising the ability of the SRN to serve strategic movements to and from Stroud for residential based, freight journeys and business travel. Excessive use of the SRN for local movements impacts on the performance of the SRN and hence its ability to support wider ambitions for economic growth in the Plan area and across Gloucestershire.

We welcome the suggestion that the ESP will look to deliver “*new employment together with new housing to create sustainable communities and to reduce the potential for further out commuting*”. We look forward to understanding more about the proposed phasing strategy to ensure that employment uses are brought forward early in the delivery of development to reduce the need to travel and thus the pressure that outward commuting puts on the M5 and its junctions.

Question 2.2a and 2.2b: Town Centres

No comments

Question 2.3a and 2.3b: Local Housing Need

No comments

Question 2.4a and 2.4b: Local Green Spaces and Community Facilities

No comments

3. Planning for the Future. A Vision for the Future

Question 3.1a and 3.1b: Do you agree with the vision for 2040 as drafted? Do you support an alternative approach? Or have we missed anything?

Highways England would welcome the inclusion of a reference to planning for the delivery of necessary strategic road infrastructure in a way which matches the realisation of planned development to ensure that it can be safely accommodated.

Question 3.2a and 3.2b: Do you agree with the Strategic Objectives as drafted? Do you support an alternative approach? Or have we missed anything?

Highways England would welcome the inclusion of a reference within the ‘Economy and Transport’ Strategic Objectives to the primary and strategic function of the SRN and ensuring that this is maintained/not prejudiced by planned growth.

4. Future Growth Strategy

Question 4.2a-c: Do you support the broad approach of the emerging growth strategy, in terms of distribution the growth required by national policy for Stroud District? Do you support an alternative strategy approach? Have we identified the right towns and villages for growth? Or do other settlements have growth potential?

The ESP sets out four broad options for the future growth strategy across the District as follows:

- Option 1: Concentrated development at a few large sites adjacent to the District's main towns
- Option 2: Wider distribution of development across medium sized sites on the edge of larger villages as well as towns
- Option 3: Dispersed development across the District with most villages including at least one small to medium scale site
- Option 4: Growth point to include significant growth either as an expansion to an existing settlement, or an entirely new settlement, in the District.

We note that consultation undertaken to date with local residents and stakeholders identified significant support for Option 1. The Council also suggests that concentrated development offers some benefits in terms of providing new residents with access to existing facilities and services and potentially in building the case to secure investment in new infrastructure.

A high-level transport assessment has been undertaken to help inform the emerging ESP, in consultation with Highways England and Gloucestershire County Council as the respective highway authorities. The assessment indicates that Option 1 is the most sustainable in highway and transport terms, with Option 2 also performing well. Option 3 is the least sustainable in highway and transport terms. Although the location of new developments likely to emerge under Option 4 are likely to be highly dependent on car-based trips, the ESP considers that planning entirely new developments would maximise opportunities to plan for the provision of alternative modes.

The ESP sets out that the future growth strategy across Stroud will distribute at least 12,800 new homes to meet the District's housing need for the next 20 years. The emerging strategy is a 'hybrid' approach comprising elements of the four growth strategy options assessed. The resulting strategy therefore looks to concentrate growth at the main towns of Cam and Dursley, Stonehouse and Stroud as well as creating two new 'Garden Village' settlements at Sharpness and Wisloe. The ESP also proposes 'modest' levels of development at smaller towns and larger villages across the District.

Concentrated Development

As noted in the ESP, these 'urban extension' sites can benefit from existing transport network as well as provide the opportunity to create new communities with onsite provision of education, retail and employment opportunities. In transport terms there are opportunities to integrate the extension into the existing transport networks, and there are opportunities to create new networks to support the urban extensions and benefit existing urban areas.

When considering the location and associated supporting infrastructure of urban extensions, we note that the SRN should not be considered as an alternative to providing capacity improvements to the existing local road network. The infrastructure improvements to support urban extensions should include the planning of adequate highway infrastructure capacity to provide for local movements, thereby maximising the ability of the SRN to serve strategic movements to and from the Plan area and more

widely. Excessive use of the SRN for local movements impacts on the performance of the SRN and hence its ability to support economic growth in the Plan area and more widely.

New Settlements

New settlements provide an opportunity to plan the transport network from the outset. They can offer considerable opportunities to create an environment and culture of not using the private car for all journeys. The Cranbrook development east of Exeter is such an example. However, this development had the advantage of being able to secure a new railway station, with regular train service, and bus services, as well as significant investment in local highway infrastructure to accompany the development.

We would suggest that careful consideration be given to the necessary transport infrastructure that would be required to support a new settlement, even a small village settlement. Site locations that can be made sustainable in terms of transport movements, and hence avoid adverse impact on the SRN, are likely to be less challenging.

When considering the location and associated supporting infrastructure of new settlements, we note that the SRN should not be considered as an alternative to providing improvements to the existing local road network. The infrastructure improvements to support a new settlement should include the planning of adequate highway infrastructure capacity to provide for local movements, thereby maximising the ability of the SRN to serve strategic movements to and from the Plan area and more widely. Excessive use of the SRN for local movements impacts on the performance of the SRN and hence its ability to support economic growth in the Plan area and more widely.

Dispersal

With regard to the SRN, this strategy has similar issues to 'new settlement', but as the scale of any one allocation would be limited, there is even less opportunity to achieve the necessary scale of development to give confidence that appropriate mitigation to the local highway network and SRN could be provided to address the overall cumulative impact of the Plan. Some trips generated by the dispersed development will wish to travel on the SRN, but the potential size and location of the allocations would be insufficient to both command and hence provide (through provision of funding) the necessary infrastructure to mitigate the cumulative impact of the proposed new development. Furthermore, the provision of more sustainable alternatives to the private car would be challenging due to the limited scale and locations of the dispersed development allocations.

Highway and Transport Strategy

It is identified that, as a result of the proposed hybrid strategy and associated development locations, there will be additional pressure on the local and strategic road networks, including M5 junctions 12, 13 and 14, which will require significant improvements to safely accommodate further growth.

At this stage of the Plan review process, the proposed 'hybrid' strategy has not been tested in terms of the likely cumulative impact of growth on the SRN, and hence any interventions required to ensure that the impact of the Plan is mitigated and thus not severe have not yet been identified. We look forward to continuing to work closely with the Council and Gloucestershire County Council as Local Highway Authority, to establish the scope of the required transport assessment and to support the development of the necessary transport strategy with associated mitigation measures as required. As outlined earlier in this letter, it is our expectation that the consideration of locations for growth will include reducing the need to travel and maximise the opportunity for travel by more sustainable modes. It is also our expectation that where necessary assessment work and transport strategy will look to strengthen and improve local highway connections to facilitate proposed growth, alongside maximising the opportunity for sustainable travel, before testing potential mitigation options comprising significant upgrades to the SRN.

Question 4.2d-e: Do you support our approach to addressing Gloucester's housing needs? Do you support an alternative approach to addressing Gloucester's housing needs?

The Joint Core Strategy (JCS) for Cheltenham, Tewkesbury and Gloucester identifies that, in the longer term, additional sites will be required to meet Gloucester's housing needs beyond 2028. The ESP sets out that Stroud District Council will work with the JCS authorities to identify the most suitable sites to meet these future needs. It is proposed that as the Plan review is developed, additional sites at Hardwicke and Whaddon form part of the assessment, which are located near to M5 junction 12.

We set out earlier in this letter that M5 junction 12 is already operating at capacity, particularly at network peak times, resulting in mainline queuing which Highways England considers to be a severe safety risk. The ESP also identifies that M5 junction 12 will need some significant improvement in order to safely accommodate future planned growth across the District. We note that M5 junction 12 is constrained in terms of its ability to offer significantly greater capacity without significant investment.

We look forward to working with the Council and Gloucestershire County Council to understand the cumulative impact of the growth strategy in this location, and the scale and nature of the improvement(s) required to ensure that the impact of the Plan is not severe.

Questions 4.3a-c: Settlement Hierarchy

No comments

Questions 4.4a-f: Settlement Development Limits

No comments

5. Making Places. Shaping the Future of Stroud District

Section 5 of the ESP disaggregates the broad strategy for growth across the District into 8 distinct 'character' areas with supporting mini-visions to inform the nature and function of future development sites in each area.

Whilst we have no specific comments on the mini-visions or whether the 'best' sites have been selected in each area, we would refer the Council to our comments set out in sections 1 to 4 of this letter, particularly in relation to the primary function of the SRN and the need for further detailed highway and transport assessment to support the emerging growth strategy.

6. Background Studies

The ESP outlines a number of areas for further work to develop the evidence base which will support the preparation of a draft Plan in 2019 and submission for Examination in 2020.

Question 6.1: Are there any other specific local studies that you believe are needed to inform the Local Plan review? Have you any advice on the scope or content of any of these studies?

We welcome the inclusion of, and recognition of the need for, further transport assessment work and the development of a transport strategy. We look forward to continuing to work collaboratively with the Council through the development of the Local Plan to assess the cumulative impact of proposed development allocations on the SRN, and the local road network, to seek to ensure that the impact of traffic from the proposed allocations on the SRN is not severe and can be safely managed, such that economic growth across the District and wider Gloucestershire is not curtailed.

I trust that this letter clearly sets out our comments and considerations in respect of the Stroud District Local Plan Review Emerging Strategy Paper 2018. Please do not hesitate to contact the Spatial Planning Team should you have any questions or queries.

Yours sincerely,



Spatial Planning South West
Highways England
Email: planningsw@highwaysengland.co.uk