

Part B – Please use a separate sheet for each representation

Name or Organisation:

Lichfields (on behalf of CEG and the Charfield Landowners Consortium)

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="X"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Lichfields provides planning advice to CEG and the Charfield Landowners Consortium (our Client) in respect of land to the south/west of Charfield within South Gloucestershire. There are a number of important cross boundary issues relevant to the emerging Stroud Local Plan and the proposed allocations to the south of the district.

Our Client has for some years been promoting the Charfield site through the South Gloucestershire development plan process for residential led, mixed use development. An outline planning application (application ref: P19/2452/O)

remains undetermined and we are in continued discussions with South Gloucestershire Council (SGC) and the M5 Junction 14 Working Group.

Strategic Road Network - M5 Junction 14

Page 10 of the Plan, in the 'Stroud District Today' section, acknowledges that significant growth is occurring along the M5 corridor (focused on Gloucester, Cheltenham and Bristol) which impacts on Stroud District now and in the future. It also states that public transport across the district is limited. The Plan therefore goes on to state that one of the key priorities is '*ensuring new development is located in the right place, supported by the right services and infrastructure to create sustainable development*'.

Section 2.3 of the Plan acknowledges that one of the key challenges to development is the pressure on roads, particularly the key network junctions within the district. Transport modelling has been undertaken which has identified the need for highway improvements at M5 junctions 12, 13 and 14 together with improvements along the A419 and A38 corridors. This section of the Plan acknowledges that neighbouring authorities are considering areas for strategic growth, including at Charfield.

The draft Plan at paragraph 2.3.30 highlights that the strategy for the south of the District (including growth and infill within settlements at Berkeley, Cam, Dursley, Kingswood, Newtown/Sharpness, Wisloe and Wotton-under-Edge) will require improvements to strategic infrastructure, for example M5 Junction 14 alongside other public transport and planned improvements to services within the area. It is therefore critical that the respective policies for allocations in the above locations deal with future infrastructure requirements and the mechanisms to ensure their future delivery in advance of development.

It is crucial that Stroud District Council and South Gloucestershire Council work together to ensure that the necessary transport infrastructure, including Junction 14 of the M5, is designed, funded and delivered to unlock the development potential of south Stroud and north South Gloucestershire. To achieve this, effective transport modelling must be undertaken as part of the evidence base to support the draft policies. Suitable funding must be identified for the infrastructure and this will need to be viability tested in order to ensure appropriate contributions can be delivered. At present the draft plan fails to adequately address these issues.

Policy CP2 - Strategic growth and development locations

The overall growth strategy for Stroud seeks to distribute 12,600 additional dwellings and sufficient new employment land to meet needs for the next 20 years. The strategy directs the majority of growth towards the main towns and two new settlements at Sharpness (10 ha of employment land and 2,400 new homes) and at Wisloe (5 ha of employment land and 1,500 new homes) supplemented by smaller scale growth at other locations such as smaller towns and villages.

The transport impacts of these significant proposals has been considered through the Mott Macdonald Traffic Forecasting Report (March 2021). The report confirms that traffic generated by the allocation sites at Sharpness, Cam and Dursley and the employment site at Land west of Renishaw New Mills (9 ha) are all likely to use Junction 14 to access the Strategic Road Network. The Report therefore

confirms that a substantial upgrade of Junction 14 within 'Preferred Highway Mitigation' will be required. Page 84 of the report summarises this as:

Very High cost schemes (>£10m) M5 Junction 14 – replacement of existing single overbridge diamond interchange with new grade-separated signalised roundabout.

CEG's consultant Evoke has undertaken extensive modelling work on the junction and the options for improvement (further detail is provided within the Transport Assessments submitted as part of planning application Reference: P19/2452/O). This has confirmed that the cost of the proposed junction 14 improvement works is likely to be c.£50m. This is therefore a significant issue that requires detailed consideration in the draft plan.

Growth in Stroud must come forward in line with appropriate infrastructure works to ensure no unacceptable traffic impacts. The impact of strategic growth on M5 Junction 14 must be tested taking into account cumulative growth in neighbouring local authority areas (e.g. Charfield) with appropriate contributions secured for a strategic highways solution. This must be an integral requirement of the draft policy.

At present, we do not consider Policy CP2 is sound. Without considering in further detail the cumulative impact of development on the highway network and the specific infrastructure to deliver those sites, this policy will not achieve sustainable development. It is therefore not considered to be positively prepared and is not consistent with the NPPF in relation to the test of soundness (paragraph 35). We also consider the policy is not supported by sufficient evidence of effective joint working on cross-boundary strategic matters with South Gloucestershire and for this reason we also consider the policy is not justified or effective.

We note that a Statement of Common Ground with the Gloucestershire Authorities has been prepared but there is no Statement of Common Ground with South Gloucestershire on infrastructure matters and cross boundary matters. This needs to be provided as a matter of urgency and made available prior to the next stage of the plan.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy CP2 must reference the significant infrastructure issues and the mitigation required to ensure growth in Stroud is sustainable and deliverable. The policy wording should cross-reference policy CP6 (Infrastructure and developer contributions) and CP13 (Demand management and sustainable travel measures).

The impact of strategic growth on Junction 14 of the M5 must be fully tested taking into account cumulative growth in neighbouring local authority areas. More detail is required in relation to the form of the mitigation proposed; the cost of the works; how these major infrastructure improvements will be funded and the level of funding anticipated from the strategic development sites clarified.

The plan should make it clear that no development should come forward until infrastructure has been designed, costed and agreed with Highways England, South Gloucestershire Council and other members of the Junction 14 Working Group and the works implemented.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to participate in the Examination in Public in order to be able to elaborate further on our position and the matters raised above particularly in relation to Junction 14 of the M5.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

[Redacted Signature]

Date:

20-07-
2021