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Via email: ██████████

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Dear ██████████

STROUD LOCAL PLAN REVIEW – STRATEGY OPTIONS TRANSPORT DISCUSSION PAPER (JULY 2018)

Highways England welcomes the opportunity to comment on the Stroud Local Plan Strategy Options Transport Discussion Paper. As you'll 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. 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 proposals and/or policies or development sites 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, which is set out in Government policy. Paragraph 15 of Circular 02/2013 (Department for Transport (DfT)) 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.'

Undertaking suitable assessment of transport impact at the plan-making stage avoids sites being chosen where:

- The traffic impact of the proposed development on the operation of nearby junctions is not known; or
- Proposals for access or transport mitigation are untested and un-costed

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.

Our comments relating to the Strategy Options Transport Discussion Paper are as follows:

Background

The Strategy Options Transport Discussion Paper has been produced by Stroud District Council officers in consultation with the Stroud Local Plan Review Transport Officers Group. It has been produced to inform Stroud District Council's decision making process regarding the preferred development strategy. It is noted that the contents of this paper should not be used outside the context of this decision making process.

The Transport Officers Group includes officers from Stroud District Council in their role as the Local Planning Authority, Highways England in their role as Strategic Highway Authority and Gloucestershire County Council (GCC) in their role as Local Highway Authority and in discharging their local transport planning function.

The paper provides a high level assessment of the likely transport issues arising for the four different development scenarios arising from the Issues and Options stage of the Stroud Local Plan Review.

Basis of assessment

The Paper sets out the assumptions used in the assessment. Four growth assumptions have been proposed:

- Option 1 Concentrated development - 5,550 dwellings and 30ha B class employment
- Option 2 Wider distribution - 5,520 dwellings and 30ha B class employment
- Option 3 Dispersal -5,695 dwellings and 40ha B class employment
- Option 4 Growth Point -6,010 dwellings and 40ha B class employment

We support the choice of growth options and acknowledge that these different approaches will provide appropriate evidence to inform the optimum distribution of development allocated in the Local Plan.

The TRICS database has been used to assess vehicular trip rates for the assessment. Figure 3 sets out the trip rates for residential and employment. Though not stated, it is assumed that these are two-way trip rates. A single rate for each of the two land uses has been assumed. This represents a simplistic approach, and we would expect that as the assessment of site options progresses through the preferred development option stage, trip rates appropriate to the size of development area and its location would be used. However, for the purpose of the Transport Discussion Paper, we consider that this simple approach is appropriate.

The trip rates are applied to the residential and employment housing assumptions, which are set out in Figure 1. It is understood that the potential site allocations assumed are the best assessment of the potential development distribution at this time. We accept the methodology that has been adopted as being appropriate for this stage of the Local Plan review site selection process.

Figure 5 and its supporting text introduces the concept of three 'belts' of development, north, central and south. The potential development allocations that are identified in each belt have in part been identified as a result of an assessment of likely motorway junction that would be used to access the M5 from each site. Figure 6 shows the distribution of trip between the 'belts' graphically. This assessment has been high level and not undertaken with the aid of a traffic model to consider the detail of local conditions. However, for the Issues and Options stage of the Local Plan Review, this methodology is acceptable. We will expect the selected option to be tested in more detail, using available traffic models, to refine the trip distribution and better identify the mitigation necessary to accommodate the development allocations.

We note and agree with paragraph 3.5 and the comments made regarding the 'focus of impact' on the three M5 junctions that traffic from the potential development site. Paragraph 6 and Figure 7 explain and show how the trip distribution has been informed by the 2011 Census journey to work data. We agree that this is a useful source of data when determining likely trip patterns and has the advantage of being multi-modal. We note that for future stages of the Local Plan site allocation assessment and identification of mitigation, the consideration of the preferred development option, a more detailed consideration of trip distribution based on all journey purposes will be required. However, as many longer distance trips in the peak hours are work related, the 2011 Census journey to work data represents the best readily available data source for this stage of the assessment of transport implications for the Local Plan review.

The commentary in paragraphs 3.7 to 3.9 explains the implications of the trip distribution on the local and strategic road network. We note and agree with the key issues that have been drawn out. We particularly note the identification and proportion of longer distance trips to the West Midlands and West of England, which it is assumed will use the M5. Thus, it can be seen that any of the development scenarios being assessed would have implications for junctions on the M5, notable Junction 12 for northbound trips and Junction 14 for southbound trips. Both Junction 12 and Junction 14

have existing pressures on their capacity, and hence the addition of yet further pressures would exacerbate the situation further.

Section 4 describes the likely mitigation strategy required for each of the development scenarios. The process adopted is described in paragraph 4.1. For the SRN is noted that for each of the development scenarios, the three motorway junctions that serve Stroud District are noted as requiring mitigation. A distinction has been made regarding M5 Junction 14, which for the Dispersal and Growth Point development scenario options has been identified as requiring a significant capacity improvement. Notwithstanding the comments above regarding the need for more detailed assessment of the preferred option strategy. We agree with this assessment of the likely mitigation requirements for each of the development option scenarios as for this stage of the Stroud Local Plan review. It is noted that there will be a need to consider the cumulative impact of development for neighbouring authorities once the preferred option is identified. The cumulative assessment will be particularly important for M5 junction 12 and M5 Junction 14.

Section 5 notes potential funding sources for the mitigation. The commentary describes the challenges in attracting funding and the relationship between funding and size of development (which relates to the concentration of impact requiring mitigation). We acknowledge and support the commentary in this section, and we will work with the Council to support the identification and justification of funding to deliver mitigation schemes on the SRN.

Section 6 describes and presents the assessment of the development scenarios. Four areas of assessment have been undertaken:

- Likely scale of mitigation required
- Cumulative impact of the site – linked to location of likely impact
- Existing car use based on 2011 census data
- Propensity of using passenger transport – before any mitigation

The consideration of wider issues and implications of providing mitigation is welcomed and supported. The delivery of mitigation is as important as the identification of need and the appropriate design. We have worked with GCC and SDC on the assessment. We note the thoughtful and thorough work that has gone into the appraisal, that is summarised on Figure 14, and agree with its findings.

Section 7 provides a commentary on the four development scenarios. Prior to preparing the report, the implications of each of the Scenarios were presented to Highways England and feedback was provided. The presentation of assessment results and issues arising reflects those discussions, and hence we are happy to accept the assessment as presented as an appropriate reflection of the potential transport implications of each development scenario.

Section 8 sets out the next steps for the development of the transport evidence base for the Local Plan Review process. Paragraph 8.2 contains a series of specific issues that

will require further assessment. The list is not exhaustive or in a priority order. We are pleased to note that M5 J12, J13 and J14 are identified, along with some approach roads/corridors to these junctions, as requiring further assessment. We endorse the view that the assessment of M5 J12 should be undertaken, if possible, in partnership with the JCS authorities. We also endorse, and would strongly encourage, that the assessment of M5 J14 be undertaken in collaboration with South Gloucestershire Council and as well as representatives from WoE/WECA who lead on the development of strategy for the wider WoE/WECA transport network (it is known that they are currently preparing LTP4).

If you have any comments or wish to discuss any of the above please do not hesitate to contact me.

Yours sincerely,

[Redacted signature]

[Redacted name]

Highways Development Management
Team Leader – South West

[Redacted contact information]