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Dear Planning Strategy Team,

**STROUD DISTRICT LOCAL PLAN REVIEW: DRAFT LOCAL PLAN PUBLIC CONSULTATION, NOVEMBER 2019**

Highways England welcomes the opportunity to comment on the Stroud Draft Local Plan. As you will be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises the junctions of M5 J12, J13. In addition, though being in neighbouring Districts, M5 J11A (Tewkesbury), M5 J14 (South Gloucestershire), the A417(T) (Tewksbury) and the A40(T) (Gloucester), are SRN junctions and routes also affected by development positioned in Stroud District. It is on the basis of these responsibilities that Highways England has provided the comments that follow in this letter.

Highways England is keen to ensure that transport and land use planning policy is closely integrated and that the network is able to deliver sustainable economic growth. In this respect, Highways England draws your attention to "The Strategic Road Network - Planning For The Future - A Guide To Working With Highways England On Planning Matters", Highways England's Licence issued by DfT and DfT Circular 02/2013, which sets out how we will engage with the planning system to deliver sustainable development.

We are interested in the potential traffic impacts of any development site proposals and/or policies coming forward through the Local Plan process 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 (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).

In summary; as a minimum, 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. In order to establish whether a section of the SRN has a severe impact, an assessment of additional traffic on the SRN as a result of the development proposals will be necessary, and agreement should be sought on the best way to establish whether the additional traffic constitutes a severe impact.

## **Local Plan Vision**

The current Stroud District Local Plan, adopted in 2015, sets out the land use planning strategy in the District up until 2031. The Plan Review will extend this horizon year to 2040.

As a result of a joint Gloucestershire authorities Local Housing Needs Assessment, the Draft Plan identifies a minimum residual housing requirement of 7,993 new homes in the District up to 2040, with the need to provide for a minimum of 638 new homes per year. This represents an increase of 40% on the figure in the current SDSLP (456 homes per year). The Draft Plan also outlines the need to plan for between 2,300 and 6,300 net new jobs between 2020 and 2040.

The Draft Plan refines the six principal strategic objectives in the current Plan, with Strategic Objective SO4 (Transport and Travel) outlining the aim of promoting healthier alternatives to the use of the private car and seeking to reduce CO2 emissions by using new technologies, active travel and/or smarter choices, working towards a more integrated transport system to improve access to local goods and services. Strategic Objective SO5 (Climate Change and Environmental Limits) reinforces these objectives, outlining the aim of supporting a pattern of development that prioritises the use of sustainable modes of transport.

Highways England welcomes these objectives. As outlined in our response to the previous Issues and Options consultation in November 2017 we share many of the same goals as the District,

including the desire to achieve a better transport system which helps reduce CO2 emissions and limits the use of the private car.

### **Strategic Road Network Considerations**

Highways England has had regular engagement with SDC during the course of the development of the Draft Plan. This engagement has included being given the opportunity to comment and provide feedback on the transport assessment work that has taken place. This has meant that we have a good understanding of the tools and parameter inputs upon which the transport assessment is being undertaken.

During our engagement with SDC, we have discussed the current performance of the SRN within and positioned just outside of the Stroud District boundary, which will need to be taken into account in the evidence base supporting the new Local Plan. Typically, the relevant M5 junctions as outlined above within the District are constrained at peak times with J12 and J14 commonly experiencing queuing extending back from the slip roads to the mainline.

Surveys and observations suggest the southbound off-slip at M5 J12 has been shown to queue back onto the mainline during the PM peak M5 J14 northbound off-slip in particular is close to capacity during weekday peak hours. Similarly, the M5 J14 northbound off-slip in particular, is close to capacity during weekday peak hours. Thus, for both M5 J12 and M5 J14, Highways England 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 a severe safety impact on the SRN.

It is expected that the transport assessment of the Draft Plan will consider the impact of the proposed allocations on M5 J12 and M5 J13 in some detail. The assessment work undertaken to date has identified M5 J12 as under pressure now and thus, with the proposed location of development allocations, it is likely to be more under pressure in the future. M5 J13 will also need to be assessed due to the proximity of proposal allocations in order to establish whether mitigation is required. Highways England has recently commissioned an assessment of M5 J12 and suggests that this work could be used as a starting point for the assessment of the Draft Plan impacts.

In addition to SRN junctions located in the Stroud District, Highways England will require a detailed assessment of M5 J14, to understand the capacity constraints, and the impact that Stroud District allocations will have on the overall capacity and safety of this junction. If necessary, infrastructure improvements may be required to be brought forward to ensure the impact of the Plan Review is not severe and can be safely accommodated.

It is noted that M5 J14 is also included as necessary mitigation to accommodate the additional traffic arising from allocations on the WoE Joint Spatial Plan. That is, sites at Thornbury, Buckover and Charfield, which are allocated as Strategic Development Sites in the WoE JSP and the transport assessment undertaken to support these sites identified that infrastructure improvements to M5 J14 would be required. Hence, we would expect that the assessment undertaken for the Draft Plan would

take account of the WoE JSP allocations, which are also reflected in the South Gloucestershire Local Plan 2018-2036 review which has had a Regulation 18 consultation (February - April 2019).

Highways England is already working collaboratively with Stroud District Council in respect of M5 J14, and this this will continue as part of the Local Plan development process.

In summary, we will be seeking to understand from the transport assessment any development site that has a sizable impact on a SRN junction, which increases the length of the mainline queue, and potentially increases the period for which mainline queues occur. These would be considered as having a severe impact. In such a circumstance, Highways England would expect necessary infrastructure required to deliver sustainable economic growth to be identified and agreed at the Local Plan stage. This should take the form of an Infrastructure Development Plan and transport strategy accompanying the new Local Plan.

Highways England will be pleased to continue to work with Stroud District in respect of the assessment of the Local Plan impacts and identifying solutions to other parts of the SRN.

### **Spatial Strategy**

The Draft Plan allocates the bulk of the Plan's new housing and employment at sites in the following locations:

- Hardwicke and Hunts Grove
- Whaddon (currently proposed to be safeguarded)
- Stonehouse
- Stroud town centre and surrounding areas (i.e. Brimscombe and Nailsworth etc.)
- North of Cam (including land at Wisloe)
- Wotton-under-Edge
- Newtown and Sharpness

In our previous response to the Issues and Options consultation we drew attention to the potential development locations largely continuing the focus of allocating sites along strategic transport corridors. This remains the case, with the Draft Plan highlighting the strategy of concentrating employment growth within the M5/A38 corridor and at location in tandem with housing growth. The primary role of the SRN is to facilitate the long-distance movement of goods and people, and thus we are keen to ensure that the spatial strategy of providing major employment opportunities and housing along the A38/M5 corridor does not undermine this function by increasing the amount of localised trips on the SRN, with the Sustainability Appraisal acknowledging the potential for this.

With that being said, whilst the spatial strategy poses potential issues for the SRN, we acknowledge that factors such as environmental constraints in the District, for example the prominence of the Cotswolds Area of Outstanding Natural Beauty (AONB), mean that allocations along the M5/A38 corridor are to be expected. Furthermore, we acknowledge that the proximity of the Birmingham to Bristol railway line and Cam and Dursley Station to a number of the major allocation sites is consistent with the Draft Plan's strategic objectives of seeking to reduce use of the private car and work towards a more integrated transport system. We note that there are proposals to improve access arrangements to the station and work with the rail industry to improve service levels will continue. We support both of these ambitions.

With regard to additional rail stations in Stroud District, we understand that there is only likely to be one new station between Gloucester and Bristol during the Plan period. If the selected location was to be in Stroud District, we recognise how this could contribute further to a sustainable transport strategy.

In addition to improvements concerning Cam and Dursley station, there are other objectives set out in the Sustainable Transport Strategy concerning increasing active travel. These include targeted measures to improve the walking and cycling network. We welcome these objectives.

We will therefore expect the Plan's Transport Strategy to be underpinned by a robust transport evidence base which robustly assesses the Plan's impact on the SRN and identifies, in collaboration with Highways England any infrastructure/intervention necessary to ensure that the Plan will not have a severe impact on the safe and efficient operation of the SRN. We note that the Draft Plan (paragraph 2.28) acknowledges the initial transport work has identified the likely need for major improvements, whatever the pattern of growth, at M5 J12, 13 and 14 as well as along the A38 and A419, which link to the SRN.

We also note many of the major Draft Plan site allocation policies state that detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements. Highways England looks forward to working with the Council to agree suitable policies and schemes in regard to SRN mitigation.

### **Impacts on the Strategic Road Network**

As acknowledged above, we recognise the logic in major development sites being allocated along the M5/A38 corridor and how this can potentially help meet the objective of working towards an integrated transport system. Nevertheless, the quantum and pattern of proposed development will inevitably present challenges for the SRN, with the majority of the M5 junctions in the Plan area and affected by the Plan already experiencing capacity issues in the peak hours.

#### M5 Junction 12

A significant amount of housing and employment development is allocated in the north of the District including at land South of Hardwicke (draft site allocation G1 - 1,200 dwellings) and Hunts Grove Extension (PS30 – 750 dwellings) and land south of M5/J12 (PS32 – 5ha employment) and land at Javelin Park (PS43 – 9ha employment), all in close proximity to M5 J12.

It is noted that land at Whaddon is proposed to be safeguarded for up to 2,500 new dwellings to meet the unmet housing needs of Gloucester City for the Plan period but also has the potential to be included in the Stroud Plan if it is ultimately concluded that the site is not needed to meet Gloucester's immediate needs. It is our expectation that if the site comes forward through the JCS, its impact would be assessed through the JCS transport assessment.

Notwithstanding the status of the Whaddon site, the scale of proposed development poses challenges for M5 J12 which already experiences significant capacity issues in the peak hours and we would be concerned about the cumulative impacts of the proposed development. We would also expect to see robust Travel Plans accompanying any planning applications associated with this allocation which lay out measures to reduce commuting on the M5, and linked to this we welcome the objective set out in the Sustainable Transport Strategy to culturally embed Travel Planning into new developments.

### M5 Junction 13

As acknowledged above, we recognise the rationale in major development sites being allocated along the M5/A38 corridor and how this can potentially help meet the objective of working towards an integrated transport system. Nevertheless the site currently termed 'M5 Junction 13' may give rise to high levels of commuting on the M5. As well as any necessary infrastructure identified through the assessment of the Plan's impact as with the proposed allocations around J12 we would expect to see robust Travel Plans accompanying any planning applications associated with this allocation which lay out measures to reduce commuting on the M5.

### M5 Junction 14

The Draft Plan (para 2.33-2.34) recognises 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 M5 J14. It states that the strategy may also benefit from public transport and other improvements to services and facilities in the wider area and refers to the transport improvements included in the West of England's Joint Spatial Plan (WoE JSP), including improvements at M5 J14, the potential opening of Charfield station and Metrobus and rural bus improvements.

The Council will no doubt be aware of the challenges and delays the preparation of the WoE JSP has encountered. This has the potential to impact on the delivery of proposed improvements to the M5 J14 associated with the proposed development in South Gloucestershire. Under the duty to cooperate outlined in paragraph 24 of the NPPF, we assume the Council will be working with neighbouring authorities to ensure the Draft Plan takes account of the latest developments concerning the JSP and the potential associated implications for SRN impacts and necessary infrastructure.

### **Proposed Site Allocations**

In addition to the comments on the proposed site allocations above and their potential to impact on the SRN, we also would like to offer specific comments on the following site allocations.

#### Wisloe, West of Draycott and Javelin Park

The proposed new settlement at Wisloe (PS37) sits between two heavily trafficked routes in the M5 and A38 with the eastern boundary abutting the M5 mainline. Similarly, the north-west boundary of the proposed residential allocation West of Draycott (PS24) and the eastern boundary of the employment allocation at Javelin Park (PS43) also abut the M5.

Given the residential aspects of the allocations, it will be necessary to ensure that the Wisloe and West of Draycott developments mitigate appropriately for the potential noise impacts. We would therefore expect the Plan to include a policy that requires the site masterplan to be designed to minimise the exposure of noise-sensitive receptors to strategic traffic. We note that the promoter material provided with the Draft Plan's consultation papers acknowledges this and includes a landscape buffer and acoustic bund designed to shield the settlement from motorway noise.

In addition to noise impacts, given the sites' proximity to the SRN boundary we would also draw attention to the importance of ensuring that drainage, landscaping and boundary treatment proposals for Wisloe, West of Draycott and Javelin Park are designed in accordance with the DfT Circular 02/2013 Annex A A1 which states that all noise fences, screening and other structures must be

erected on the developers land, and far enough within the developers land to enable maintenance to take place without encroachment onto highway land.

### Sharpness

The Draft Plan proposes significant development at Sharpness, with a new 'Garden Village' (Draft allocation PS36) comprising up to 2,400 dwellings by 2040 (5,000 by 2050 in Phase 2) and 10 ha employment land in addition to further expansion further north with up to 300 dwellings as part of the existing site allocation (Sharpness Docks – allocation SA5 in current LP, draft allocation PS34 in the draft) and up to 70 dwellings at Land at Focus School, Wanswell (draft allocation PS35).

The Sustainable Transport Strategy acknowledges the relative remoteness of the proposed Sharpness Garden Village location, with the Sustainability Appraisal noting that new residents could be left without immediate access to a wide range of existing services and facilities during the early stages of the development. This naturally raises some concerns about the potential impact on the highway network as a result of challenges in delivering sustainable alternative modes, meaning that there could potentially be a significant number of private car trips on the local road network and SRN in order to access employment and commercial destinations. Draft Policy PS36 refers to plans for a new rail station enabling services to Cam and Gloucester and rapid bus services to the nearest main settlements. However, we are not currently aware of any commitments by the relevant rail and bus operators regarding the new infrastructure and services, which raises concerns that the new settlement may be heavily dependent on the private car. This risks creating further pressure on the SRN particularly at M4 J14 and conflicting with the aforementioned objectives of the Draft Plan to reduce reliance on the private car and work towards a more integrated transport system as per Strategic Objective SO4. Any Transport Assessment associated with the proposed Garden Village allocation would be expected to demonstrate how sustainable patterns of movement would be achieved. We would also suggest that the policies associated with this development allocation should reflect the requirement for the infrastructure to be secured prior to development commencing. This is to avoid a partial development being opened without the intended sustainable transport infrastructure being provided.

We also note that the Draft Plan document and Sustainability Appraisal state that the new settlement at Sharpness will include a primary school(s) and secondary school but the Sharpness Vale promoter prospectus provided in the Draft Plan supporting evidence does not make any reference to the secondary school. The lack of secondary school associated with the new settlement would inevitably have further implication for the wider transport network. Highways England would therefore welcome clarity on this matter.

### **Sustainable Transport Strategy**

We note the intended District-wide mode-specific strategies, which includes an Interchange Strategy that will investigate potential opportunities for Interchange Hubs to be established on edge of settlements and/or at strategic road connections including M5 junctions. Highways England would welcome to opportunity to work with the Council to ensure that such measures do not have an adverse impact on the SRN and to be reassured that the onward public transport services would be attractive to potential users.

We recognise that further transport assessment work is forthcoming in regard to the Draft Plan's impacts on the highway and transport network. On review of this information we will be able to confirm



whether there are additional issues to those outlined above. We look forward to engaging further with the Council as the Plan develops.

We trust that our response will be helpful and assist you with your Local Plan review. If you require further clarification on any issues, please do not hesitate to contact me.

Yours sincerely,



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