

## **Stroud District Local Plan Review Examination**

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Ms Kathy O'Leary

Chief Executive  
Stroud District Council

Sent by email

24 October 2023

Dear Ms O'Leary

### **Stroud District Local Plan Review Examination**

Thank you for your letter dated 17 October 2023, along with the technical note. We also acknowledge the letters received from South Gloucestershire Council (SGC), Gloucestershire County Council (GCC) and National Highways (NH). We wish to extend our thanks to all parties for responding to our request in our letter dated 2 October 2023.

Whilst we continue to consider the responses and information received to date, there are several matters on which we require further information to aid us in our deliberations.

Firstly, we note that GCC has offered to act as scheme sponsor for further work relating to J12. However, NH notes that the further work relating to J14 would also require the identification of a scheme sponsor. In order to ensure that any further work is produced in an effective and timely manner, we would request that the relevant parties agree an identified scheme sponsor for the J14 works. This information should then be communicated to us.

As outlined in our 2 October letter, our questions relating to the need for further modelling on the impacts of the list of sites provided that would not impact on J12 and J14 was in relation to concerns raised by NH that

this had not been evidenced by modelling. In their response to our letter, we note that NH requests additional time to assess the technical note produced by Stroud District Council (SDC) dated 16 October 2023. We would like to invite comments from both GCC and NH on the technical note submitted by SDC. Comments should cover the impacts on the strategic and local road network (dependant upon the area of interest) and whether any further modelling or technical work needs to be undertaken. If it is felt that further work is required, then the reasons for this should be clearly explained.

We also wish to draw attention to our previous advice set out in our letter dated 4 August that removing site allocations from the Local Plan that would have an impact on J12 or J14 may well represent a significant alteration to the spatial strategy for the Local Plan. As stated, this is likely to require further extensive consultation and assessment leading to further delays in the Examination process.

It is evident from the responses received from NH, GCC and SGC that there is a range of views on the Action Plan that has been prepared and submitted to us by SDC. What remains a critical consideration is that for any further work to be effective, the relevant partners should be in agreement as to what needs to happen and when. This is not a piece of work that SDC can complete on its own otherwise it will not achieve the desired outcomes. It seems sensible to ensure that such agreement can be reached between the relevant partners at the outset and before any work commences to avoid the risk of that work proving abortive.

To that end, we would request that all parties (SDC, GCC, NH and SGC (where relevant) work together in order to produce a joint Action Plan that should be submitted to us. This should set out a list of agreed actions in priority order along with a realistic timetable for completing this work. This should include if, and when, further modelling / evidence base work needs to be undertaken, whether design work needs to be completed prior to cost estimates and at what stage an apportionment exercise of costs should be undertaken. This list is not exhaustive, and it should be ensured that the Action Plan contains a comprehensive list of necessary actions.

We note and welcome the continued expressed desire of all parties involved to continue to work together in order to ensure that SDC is able to have an up-to-date Local Plan in place. However, the design, funding, delivery and implementation of major infrastructure schemes like motorway junction improvements are complex and costly projects. Partnership working between the relevant organisations at all stages is key to their success as is the identification of suitable funding to ensure that these projects can be delivered. We therefore consider it essential

that an agreement be reached prior to further work commencing on the scope and timescales for the work as all parties will need to take ownership and contribute to it in order for it to succeed.

In regard to the level of certainty required for funding infrastructure projects, in the case of smaller less strategic pieces of infrastructure, such as a small-scale signalised junction improvement to serve a housing development the costs are significantly less. As a consequence, it is reasonable to assume that the scheme costs would be capable of being met by developer contributions (for example). This makes delivery of these projects reasonably certain and more detailed evidence regarding funding is not necessary other than the usual Local Plan viability work that has taken place.

However, in the case of large-scale infrastructure projects costing tens of millions of pounds the likelihood of the cost of that scheme being able to be met by developer contributions is much smaller due to the sheer scale of the amount of financial contributions that would be required. All parties have agreed that a source of external funding would be required due to the scale of the costs involved but the source of this external funding has yet to be identified. Therefore, in this case a lack of specific identified funds makes the delivery of these large-scale infrastructure projects much less certain. As a result, whether there is a reasonable prospect of these schemes being delivered is called into question.

In summary, we wish to invite comments from National Highways, Gloucestershire County Council and South Gloucestershire Council on the technical note submitted by SDC dated 16 October 2023. We also request that a scheme sponsor for J14 improvements is identified. We would also like to invite the relevant organisations to work together and send to us a joint Action Plan that has been agreed by and is supported by all parties.

We would be most grateful to receive all responses by Friday 10 November. However, if further time is needed, please let the Programme Officer know when a response will be submitted.

We would like to inform all other interested parties that we are not, at this stage, inviting or accepting any other comments on this matter. Such responses will be immediately returned to the sender by the Programme Officer.

Yours sincerely

*Victoria Lucas and Yvonne Wright*

Inspectors appointed to examine the Stroud District Local Plan Review