



Ms Lucas and Ms Wright
The Planning Inspectorate
Temple Quay House
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5 May 2026

Dear Ms Lucas and Ms Wright,

**Re: Stroud District Local Plan Review Examination
Matter 11 – Strategic Transport**

Thank you for your letter inviting further responses in relation to Matter 11 and the additional technical evidence on the Strategic Road Network submitted by National Highways in June 2025.

The Council welcomes the opportunity to provide further clarity on the evidence previously submitted, and in particular to assist the Inspectors' understanding of the implications of the updated National Highways assessments in relation to M5 Junctions 12, 13 and 14.

The Council considers this updated evidence to be significant. As the Inspectors will be aware, the August 2025 reports represented a material change in National Highways' position when compared with the position previously expressed during earlier stages of the Examination. The evidence demonstrates that, subject to identified interventions, the Strategic Road Network is capable of accommodating a substantial proportion of forecast traffic growth arising from the Local Plan. This represents an important development in understanding the transport implications of the Plan and has clear relevance to considerations of soundness.

We recognise that the National Highways reports observe congestion effects on elements of the local highway network and note that capacity testing of the local network was not within the scope of those assessments. It is important to clarify that this observation reflects National Highways' jurisdictional remit, rather than a request for further modelling or additional technical work. National Highways does not model the local road network, which properly falls within the responsibilities of the highway authority, and the references in the reports are intended to make that distinction clear rather than to imply a deficiency in the evidence base or a requirement for further assessment at this stage.

The Council is conscious that some elements of the Inspectors' questioning may be interpreted as moving towards a narrative whereby, notwithstanding the

demonstrated capacity of the motorway junctions, there may be insufficient evidence that impacts on the local road network can be accommodated. In the Council's view, it is important to place a clear marker on the level and purpose of highway modelling required to support a Local Plan.

National policy and guidance are clear that transport assessment at the plan-making stage is intended to identify likely impacts and potential mitigation measures, rather than to resolve all matters of detailed design, costing or delivery. The National Planning Practice Guidance confirms that transport assessment should be produced at Local Plan level "to identify any potential measures that may be required to mitigate negative impacts", rather than to fully design or implement those measures at that stage.

Against this backdrop, the Council is concerned that the absence of fully detailed mitigation designs for the local road network could be conflated with an absence of evidence that impacts can be mitigated in principle. The appropriate test at the Local Plan stage is whether there is any in-principle basis for concluding that the impacts of planned development could not be suitably mitigated. Matters of detailed design, refinement, costing, funding and further modelling would ordinarily be addressed through the planning application process and updated over time to reflect changes in national policy, local circumstances and observed traffic conditions.

The Council wishes to emphasise that proportionate transport modelling has been undertaken to support the scale and spatial distribution of development proposed in the Plan. In parallel, the Infrastructure Delivery Plan identifies relevant local highway interventions and investment priorities, developed in collaboration with Gloucestershire County Council as the highway authority. Taken together, this evidence provides a clear and credible basis for concluding that local highway impacts are not insurmountable and that there are reasonable prospects of mitigation and delivery, which is the appropriate test for assessing soundness at the Local Plan stage.

The Council hopes that the above assists the Inspectors in understanding the context and implications of the updated National Highways evidence and the Council's position on local highway impacts. The Council will, of course, respond fully to the specific questions set out in your letter and remains grateful for the opportunity to provide further clarification where this may be helpful.

Inspectors Questions

8. It is our understanding that the modelling originally undertaken to support the delivery of all the Plan's proposed growth was prepared on the basis that it would be necessary for large-scale junction mitigation schemes for M5 J12 and J14 to be implemented during the Plan period, as set out in the Infrastructure Delivery Plan (IDP). For instance, a grade-separated roundabout scheme at J12 of the M5 motorway would need to be implemented and operational by 2030.

Q1: Is our understanding correct?

Yes.

The strategic modelling was the tool used to determine that mitigation would be required for M5 Junction 12 (J12) and Junction 14 (J14). The '2041 Do Something (DS) Without Mitigation' scenario demonstrates the impact of the full Stroud District Council Local Plan (SDCLP) on both the Strategic Road Network (SRN) and Local Highway Network (LHN). The '2041 DS With Mitigation' scenario demonstrates that the proposed mitigation (including schemes at J12, J14 as well as various local junction / corridor schemes) would be suitably ameliorate these impacts. These mitigation requirements were included within the Infrastructure Delivery Plan (IDP).

9. Subject to specific modifications to the Plan and interim SRN measures, the National Highways' reports identify that large-scale improvements to J12 and J14 would no longer be required to be implemented during the Plan period. This would result in around 70% of the proposed housing growth being delivered rather than all the planned growth.

Q2: In your view, if the motorway junction improvements are not delivered in advance of the planned growth, has the impact on the local highway network been adequately assessed?

Stroud District Council's (SDC) position is that the evidence provided to date is sufficient to understand the likely impacts of the SDCLP on the LHN should the large-scale improvements to J12 and J14 not be delivered within the Plan period.

The 2041DS Without Mitigation scenario provides a case where full growth is modelled and there are no improvements to either the SRN or LHN. This identifies the locations where mitigation will be required. The 2041 DS With Mitigation scenario adds mitigation where it is required. This included grade separated junctions at J12 and J14. Importantly, not only does this assess whether mitigation would be effective in individual locations, but also examines the effects of these schemes including in terms of impacts of traffic reassignment. Thus impacts of full growth on the LHN has been assessed with both no mitigation and a greater level of mitigation than is currently proposed. The IDP captures the LHN and SRN mitigation requirements in either eventuality, showing that the full range of outcomes has been adequately assessed and mitigated against. This is a suitable and level of detail for the current Local Plan stage, and provides a framework for mitigation requirements as established in the IDP.

SDC consider that site-specific assessment and mitigation requirements for the LHN will be available through the planning process as / when allocations come forward for planning approval. The planning process will require the submission of a Transport Assessment (TA) which will assess all of the relevant highway network to determine individual mitigation requirements. Applications will also need to comply with the relevant planning policy, including requirements to contribute / deliver strategic mitigation requirements for both the SRN and LHA, as identified in the IDP should the SDCLP be adopted. On this basis, the planning process will ensure assessment

and mitigation of the LHN on a site-specific basis, incorporating the strategic requirements in the IDP.

For the avoidance of doubt, the “specific modifications” referred to in Paragraph 9 refer to the removal of site allocations G1, G2 and PS30 from the SDCLP. Combined, these allocations comprise 2,100 dwellings. Removal of these sites would result in a residual growth of 13,227 homes, representing 105% of the total SDC Housing Need (12,600 homes). The SDCLP trajectory provides 15,337 homes, above the required Housing Need. Please refer to SDC’s Letter dated 11th July 2025 and Appendix 2AC as submitted as part of the Examination in Public (EiP) evidence base.

Q3: Would the exclusion of site allocations from the Plan (G1, G2 and PS30) be justified to delay the requirement for the J12 improvements to beyond 2040 (the end of the Plan period)? Would this give rise to any unforeseen impacts or consequences that we need to be made aware of specifically in relation to transport? (We are aware that there may be other non-transport related consequences that would need to be considered separately to this consultation).

Based on the NH modelling reports, and noting that the delivery of suitable mitigation for J14 is agreed as reasonable prospect, there are two scenarios. If it is accepted by the Inspectors that there is a reasonable prospect of mitigation being delivered at J12 by c.2030-32, then the full Plan can proceed (from a transport perspective). If this is not accepted, then the Plan can proceed with the removal of the site allocations G1, G2 and PS30 from the SDCLP, also with the removal of a scheme at J12 from the IDP. Either scenario would allow for time to agree funding and design / construct the improvements whilst still delivering substantial levels of plan-led growth for Stroud District. However, this is illustrative only, and SDC is not proposing or seeking the removal of any sites. This matter was discussed previously and appears to have been included by the Inspectors as a follow-on from potential scenarios explored during the EiP sessions in 2022.

SDC consider that the recent modelling undertaken by NH provides certainty in relation to the impact of such a delay specifically at M5 J12. Any unforeseen impacts or consequences would therefore be in relation to the LHN. As discussed in relation to Question 2, SDC consider that the strategic modelling to date provides suitable information on the likely impacts of the SDCLP on the local highway network and that strategic direction as to mitigation requirements is provide through the IDP and policy wording of the SDCLP. Residual impacts and mitigation requirements will be provided through the planning process. This approach is already being demonstrated successfully through recent joint working between the relevant authorities in connection with applications and appeals at Cam and Sharpness. This illustrates that the approach is not only appropriate, but is operating effectively in practice and has, in some respects, progressed ahead of the Local Plan process.

It is acknowledged that a specific scenario of “less growth, less mitigation” has not been assessed. However, as discussed above, “no growth, no mitigation” and “full

growth, full, mitigation” scenarios have been assessed to determine full scope of mitigation needs. It is SDC’s position that the level of assessment is reasonable for the Local Plan.

Q4: If these SRN mitigation schemes are not necessary to bring forward around 70% of the planned housing growth, does this change the assumptions underpinning the wider traffic modelling, specifically in relation to the local highway network?

Yes. These changes to the growth and mitigation requirements for J12 and J14 would change the assumptions for the wider traffic modelling, and the strategic modelling would have been undertaken differently had this been the assumption for the SDCLP from the outset. This scenario has not been directly assessed in relation to the local highway network, as the approach remains to bring forward the full Plan on the basis that there are reasonable prospects for the delivery of improvements at Junction 12.

This being said, SDC consider that suitable and proportionate modelling of the impacts on the LHN has been provided through the scenarios provided to date and that residual impacts can be suitably addressed through the planning process. The removal of site allocations G1, G2 and PS30 would serve to reduce overall traffic growth on the LHN, although the balance of traffic flows may change as a result of not delivering a scheme at J12. This may mean impacts could change, but again it should be noted that Full growth has been modelled with no mitigation and with an extensive suite of mitigation to identify IDP requirements. Therefore the delivery of less growth with less mitigation would reasonably be expected to result in reduced mitigation requirements from the IDP, rather than the addition of new mitigation requirements.

Q5: In your view, does the modelling need to be revised and/or further evidence produced so that the impacts of planned growth on the local highway network (without the large-scale junction schemes and including the potential removal of three key site allocations) can be fully understood, to inform our considerations as to whether the Plan is sound? If so, what would be required and what would be the anticipated timeline for completing any such work.

Updated modelling of this specific scenario could be undertaken if required, and subject to agreement from relevant stakeholders. However, SDC consider that there is little value in doing so.

It is considered that suitable levels of detail as to the impact of this scenario can be inferred from the existing modelling scenarios (e.g. 2041 DS Without Mitigation). As discussed above, a “no growth, no mitigation” scenario and a “full growth, full, mitigation” scenario have been assessed to determine full scope of mitigation needs. On this basis, SDC consider that a suitable proportionate level of detail for the current Plan stage has been provided. Residual mitigation requirements can be captured through the planning process at a later stage as needed.

Q6: How could any local highway network impacts identified be resolved via the planning system? For example, any impacts arising from delaying J12 improvements to beyond 2040 and implementing the Charfield scheme at J14?

The impact of developments on the local highway network can be addressed through the planning system, working alongside the strategic direction provided by the SDCLP.

TAs submitted alongside planning applications would be required to assess the impact of the proposals on the highway network, and then demonstrate how these impacts can be mitigated. Such assessment would be able to provide more granularity to the detail of impacts for a specific site compared to the strategic modelling evidence which has supported the SDCLP.

Alongside this, the IDP and Plan policy wording place the onus on developer to deliver suitable mitigation for any impacts identified through the Plan at a strategic level. SDC consider that sufficient detail has been provided as to the likely local highway impacts at this strategic level to work suitably alongside the site-specific TA.

This is the standard way that the Local Plan and Development Management processes should and do work.

10. The J12 report identifies significant congestion at the Cross Keys roundabout located to the west of J12.

Q7: What improvements are planned at the Cross Keys roundabout, when are they proposed to be implemented and how would they impact on the operation of J12 and the local highway network? Has this been considered in the traffic Modelling?

SDC defer to GCC as to the details of committed improvements to Cross Keys Roundabout in terms of the specific proposals and timing. However, it is understood that the improvements required for the SDCLP are soon to be completed, as delivery of housing and mitigation has continued despite the delays in the Local Plan process.

The improvements at Cross Keys will be positive for the operation of J12, given that they are intended to reduce queues on the A430 towards the M5. This reduces the opportunity for queues to “block” the A430 exit of J12 and impact on the performance of the junction. This benefit would be available with or without improvements to J12.

The SDCLP modelling to date has identified that the committed improvements are needed at Cross Keys. The 2041 DS With Mitigation scenario included the SRN improvements to provide “unconstrained” flow to Cross Keys, and then demonstrates that Cross Key mitigation is sufficient for the junction to operate effectively.

Theoretically, if the position is now that the J12 improvements are not required until after 2040 (assuming removal of growth allocations G1, G2 and PS30) then this “unconstrained” situation remains a robust assessment of the level of traffic which could reach Cross Keys, and the Cross Keys scheme remains relevant. The removal

of G1, G2 and PS30 will also reduce traffic demand at this location, further demonstrating that the committed improvements to Cross Keys will be sufficient for the updated Plan considerations.

The Cross Keys scheme has not been included in the Vissim modelling undertaken by NH, and nor would it be NH's role to do so. However, this can be done as part of the work which would be required to develop and implement a scheme of this nature, and SDC does not consider further modelling at Cross Keys to be a pre-requisite to the Local Plan coming forwards.

11. We understand that J13 can accommodate the planned growth identified within the submitted Plan, in line with the mitigation identified in the IDP.

Q8: Is our understanding correct and do you agree with this statement?

Yes.

12. The J14 report refers to National Highways accepting an interim scheme for improving the junction, in connection with the Charfield planning application. This would allow for planned growth to be accommodated at J14 without the need for a grade separated junction.

Q9: Do you agree that the interim Charfield scheme at J14 will allow for planned growth to be accommodated at J14 without the need for a grade separated junction?

Yes. SDC understand from NH's J14 modelling report that the entire SDCLP growth can be accommodated with an interim scheme in place.

Q10: Are there any other effects arising from the implementation of the Charfield scheme that we should be made aware of, such as any impacts arising on the local road network that could be severe in your view? If so, how could these be dealt with through the planning system?

The impacts arising specifically at the SRN have been addressed in NH's modelling report.

Consideration for the impacts at the A38 / B4509 junction (located adjacent to M5 J14) have been addressed as part of the design, costing and modelling assessment of J14 – please refer to 'Design and Costing M5 Junction 14 Report' (EB133a). The modelling of J14 included an indicative improvement to this junction, as identified within the IDP, and concluded that the design could accommodate the traffic flow increase in the 2040 DS scenario.

In terms of the wider network, it is considered that the Plan modelling and IDP have provided sufficient direction as to the strategic mitigation requirements required for the current plan stage. The IDP and policy wording of the SDCLP combined with the site-specific assessment which will be undertaken through the planning process suitably address impacts on the LHN.

13. Our overarching questions are:

Q11: It would help us if you can summarise and confirm your positions in relation to J12 and J14 and the junction improvements that are necessary to bring forward the planned growth, and specify timelines for implementation?

SDC's views in relation to J12 and J14 are as follows:

- J12. SDC still supports full local plan delivery as there are reasonable prospects for J12 improvements to be delivered. There are two options which have been discussed by the Inspectors in these questions:
 - o Retain the full growth allocation from the SDCLP and implement SRN improvements prior to 2030. Agreed prelim designs, costing and modelling are available for this scheme. Detailed design, business case, funding bids and construction would need to take place prior to 2030 for the Plan to remain on this trajectory.
 - o Remove site allocations G1, G2 and PS30 from the SDCLP. This pushes the requirement for SRN improvements back to after 2040, after the SDCLP period. Removal of these sites would still retain 105% of SDC's housing need.
- J14. There is now no requirement for the delivery of a grade-separated scheme at this junction subject to implementation of the interim scheme which is being delivered and subject to the effective implementation of "vision-led" planning as part of the planning application process.

Q12: Are there any specific schemes or programmes that you consider are necessary and should be included in the IDP?

SDC considers that the evidence to date provides sufficient and proportionate detail for the Plan stage and EiP. This means that the current IDP captures all necessary strategic requirements. Combined with more detailed site-specific assessment through the planning process, this suitably addresses the impacts of planned growth.

Q13: In your view have transport impacts (such as congestion) on the local highway network been adequately assessed and understood taking the new SRN evidence into account? Is there a need for further modelling or any other assessment/study? If so, please explain what would be required and the anticipated timeline for completing any such work.

SDC considers that the evidence produced to date is sufficient and proportionate to understand the potential impacts of planned growth on the strategic and local highway network for the current Plan stage.

The NPPG advises

"The transport assessment should be produced at a Local Plan level in partnership with all relevant transport and planning authorities, transport providers and key stakeholders, for example, the Local Economic Partnership. It may be appropriate for the transport assessment to cover an area wider than the Local Plan at least initially

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given the size of some travel to work areas (this would be similar to the Strategic Housing Market Assessment). This process should help to identify any potential measures that may be required to mitigate negative impacts.”

Paragraph: 005 Reference ID: 54-005-20141010

See also Paragraph: 008 Reference ID: 54-008-20141010

It is acknowledged that a specific scenario with reduced growth and no mitigation at J12 has not been directly assessed, however it is considered that the strategic modelling to date provides sufficient information to provide information at a strategic level. As discussed above, a “no growth, no mitigation” scenario and a “full growth, full, mitigation” scenario have been assessed to determine full scope of mitigation needs. Detailed impact / mitigation requirements can be determined through the planning process at a later stage as required.

Q14: Could any local highway network impacts identified be resolved via the planning system and if so, how? For example, any impacts arising from delaying J12 improvements to beyond 2040 and implementing the Charfield scheme rather than a grade separated junction at J14?

Yes. SDC consider that the planning process is now the most suitable way to identify residual site-specific impacts. The unfortunate reality is that this scenario is now playing out anyway. The SDCLP assessment to date, and associated inclusions within the IDP and associated policy wording provide a suitable strategic direction to the delivery of mitigation. Any development would be required to prepare a TA to support a planning application, and this would provide a more detailed assessment of site-specific impacts and mitigation requirements. Delivery / contribution to specific mitigation schemes identified in the IDP can be secured via planning obligation / condition accordingly. This is the standard way that the Local Plan and Development Management processes interact to secure mitigation.

Q15: Are there any additional local issues or impacts to both the strategic and local road networks that have arisen because of the updated evidence base that need to be addressed?

No.

The updated NH modelling has itself provided additional clarity on the requirements of the SRN and these are now well-understood (see SDC’s response to Question 11).

As above, SDC’s position is that the evidence provided, including the strategic modelling, provides suitable and proportionate information as to the strategic impacts for the LHN. Residual requirements can be dealt with through the planning process.

Q16: In your view are there any additional evidence base studies or transport modelling that should be undertaken to inform this Examination? If yes, then please explain what and why it is necessary.

No. SDC does not consider it necessary to conduct further studies or modelling. It is considered that the evidence provided is sufficient to have suitable and proportionate confidence in the impacts of growth for both the SRN and LHA.

14. We note that National Highways have requested additional transport evidence in relation to a recent planning application submitted to Stroud District Council on the Sharpness site allocation (PS36), including additional traffic modelling.

Q17: What is the nature of this additional transport evidence requested? What additional traffic modelling will be carried out? In your view, is this issue relevant to the Examination and the soundness of the Plan? Are there any other evidence base studies or transport modelling that need to be undertaken?

SDC defer to NH to respond to this matter in relation to their comments in relation to the Sharpness allocation. However, SDC understands from discussions with GCC and NH April 2026 that this additional evidence does not relate to Local Plan matters, i.e. the soundness of the allocation, but the more granular level of evidence required in a TA. Again, this is typical of the planning process, where principles and strategic matters are determined at Local Plan stage, if required, and details are analysed and agreed through planning applications. In this case, the two processes are concurrent, but requests for evidence made in relation to planning applications should not be confused with matters of principle or soundness. SDC does not consider that any further transport evidence base or traffic modelling is required specifically in relation to PS36 for the purposes of the Examination.

Conclusion

In summary, SDC considers that the updated evidence from NH, together with the existing strategic modelling, Infrastructure Delivery Plan and policy framework, provides a proportionate and sufficiently robust basis for understanding the transport impacts of the Plan at both the strategic and local levels. Taken together, this evidence demonstrates that the impacts of planned growth are capable of being mitigated in principle, with residual and site-specific matters appropriately addressed through the planning application process. On this basis, SDC considers that the transport evidence remains adequate to inform conclusions on the soundness of the Plan.

Yours sincerely



Kathy O'Leary