



STROUD DISTRICT COUNCIL

Ebley Mill • Ebley Wharf • Stroud • Gloucestershire • GL5 4UB
01453 766321
www.stroud.gov.uk

By email

17th October 2023

Dear Ms V Lucas and Ms Y Wright,

Thank you for your letter dated 2 October 2023.

In the Council's response of 29 August to your letter dated 4 August, we set out a number of options to explore fully and pragmatically before considering the withdrawal of the Plan and the loss of the benefits that an up-to-date plan would deliver to the community.

Housing supply

We set out firstly our understanding of the potential housing supply from sites which don't materially impact upon the constrained M5 junctions, which was submitted previously to the Examination as Appendix 2ac6. This shows a cumulative total of 8,632 dwellings coming forward over the plan period. This can be compared with the total housing need identified in the plan for the 20-year period 1 April 2020 to 31 March 2040 (630 pa over 20 years) of 12,600 units. Thus, the trajectory demonstrates that nearly 70% of the housing need for the plan period can be delivered without any reliance upon the sites related to the M5 improvement works.

In that letter we also broke down this supply further to demonstrate that ten years of need can be met within the first 8 years of the draft Plan period by sites that are not reliant upon the M5 improvement works coming forward. Further, the identified supply can deliver more than 13 years of the Local Plan total requirement.

In your latest letter, you have asked the Council for further information to be provided "as to the modelling that has been undertaken to demonstrate that any sites identified would not impact on these junctions (including those listed in the appendix 2ac6 note on housing supply)."

We set out in the attached Technical Note the evidence from the strategic transport modelling which has previously been reported through the Traffic Forecasting Report (TFR) (EB61) and its Addendum (EB98) and which has informed the subsequent Funding and Delivery Plan (EB109). It should also be noted that the methodology and numbers for identifying the proportions of traffic impact from each site were previously presented to and agreed by the Stroud Transport Working Group through a series of meetings during the production of the Funding and Delivery Plan. It is therefore well understood by the relevant transport authorities.



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The analysis shows that, at both M5 junctions, the level of traffic impact associated with the sites included within the housing trajectory presented in Appendix 2AC6 is limited. This equates to solely 100 trips in the AM Peak at Junction 12 across the whole plan period, and 29 trips for Junction 14 across the whole plan period. The Note identifies these 6% and 3% impacts respectively over Do Minimum flows as creating “no discernible environmental impact” in the context of the advice contained within the 2023 updated IEMA Guidance “Environmental Assessment of Traffic and Movement.”

We have shared the draft Note with National Highways, Gloucestershire County Council and South Gloucestershire Council for their comments.

The Technical Note supports the Council’s view that the draft Plan housing supply from those sites not impacting on J12 and J14 is likely to provide a sound basis for meeting housing needs in the immediate 5 to 10 years and beyond.

In our letter of 29 August 2023, we set out that this supply opens up the option of adopting the draft Plan at this stage with a commitment to an early review. This option would ensure that the community has the benefit of a local plan which allocates sites sufficient to meet needs over the first 10 years until a new and further plan is in place. That further plan would be produced in circumstances where there would be a greater level of certainty regarding the costs and deliverability of the M5 improvements works and the availability of external funding, which is often reliant on sites being allocated in an adopted Local Plan.

The Council considers that the current identified housing supply provides a justification for adopting the draft Plan now, with a commitment to an early review. Council officers are currently updating the housing supply from the latest monitoring information, and we remain available to discuss the housing supply at a reconvened housing supply examination hearing session before the end of 2023. Alternatively, if there were a requirement to identify a greater housing supply to be identified which does not impact materially on junctions J12 and J14, the Council has set out in our letter to you of 29 August (and in our Action Plan of 12 September) how we would propose identifying an additional housing supply if the Council were to be permitted to continue work during a 6 months pause to the examination.

Funding and delivery of improvements to J12 and J14

In your latest letter you state that “we will require evidence (agreed with all relevant parties) of a firm commitment to the funding and delivery of improvements to J12 and J14.” You also say that “specific funding streams will need to be identified and secured in order to provide certainty.”



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In our letter to you of 29 August, we set out the Council's understanding of the NPPF that whilst infrastructure and housing delivery should be aligned, "the associated infrastructure requirements may not be capable of being identified fully at the outset." (NPPF, footnote 37). Further, Circular 01/2022, states that at a local plan stage, evidence should be provided "that the funding, partners and relevant processes are in place to enable the delivery of infrastructure; or that there is a realistic prospect that longer term investment can be secured within the timescales envisaged." (Circular 01/2022 para. 34, my emphasis).

The Council is concerned that your letter could be read as applying a policy approach which is inconsistent with the approach in the NPPF and/or Circular 01/2022. We draw this to your attention simply to ensure that you do have the correct policy approach in mind when considering the way forward for the Local Plan. The Council does not consider that it is appropriate to require a firm commitment to funding in advance of the adoption of a local plan. This is for simple practical reasons; landowners/developers will not provide commitments to fund in advance of adoption of a plan which allocates their sites. A policy approach which requires funding commitment in advance of adoption from sites which are not yet allocated cannot in practice be provided.

The Council considers that the workstreams set out in our letter to you of 29 August relating to identifying the design and costs of the necessary schemes, the identification of public and private funding and apportionment options with sensitivity testing, as articulated subsequently through the Action Plan circulated to you on 12 September, demonstrate that there is substantial and important work that can be done in a relatively short timescale.

This will deliver further evidence within 6 months allowing you to conclude that there are reasonable and realistic prospects that the infrastructure improvements can come forward in a timely fashion.

If you should continue to believe that more certainty than this is required, the option of adopting the draft Plan with the housing supply not materially affecting the two motorway junctions still remains available to you. We said in our letter to you of 29 August, that under such a scenario the Council could propose an amendment to the draft Plan to prevent the sites with a relationship to the M5 works from coming forward until those works are committed/delivered and for the Council to commit to early review.

During the preparation of a new early review local plan and the delivery of the existing identified housing supply, further work can be undertaken to achieve a greater level of certainty regarding the delivery of the M5 improvements works and the availability of external funding.



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In summary, the Council considers that there continue to be a number of pragmatic options before you which are capable of delivering a sound adopted Local Plan. As we have previously stated, the Council does not believe that withdrawing the draft Plan and going back several stages is appropriate, nor that this would be beneficial for our communities. Withdrawal of the draft Plan would not assist with the proper planning of land uses and infrastructure in the District in the short to medium term.

The Council notes recent events at Spelthorne Borough where the Government has intervened to ensure that work on that local plan continues. In our case, Stroud District Council is actively seeking to bring forward the growth required by Government policy and we would, respectfully, ask you to take into account this direction of travel when considering your positive and pragmatic approach to finding a solution.

Yours sincerely



Kathy O'Leary
Chief Executive