



# STROUD DISTRICT COUNCIL

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01453 766321

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Ms Lucas and Ms Wright  
The Planning Inspectorate  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol  
BS1 6PN

11 July 2025

Dear Ms Lucas and Ms Wright,

## **Re: Request to Consider New Evidence and Reopen Hearing Sessions – Stroud District Local Plan Examination**

Further to your letter received 24 April 2025, and as part of our ongoing collaborative work to comprehensively address all highways issues affecting the draft Stroud District Local Plan (SDLP); I am writing to update you on agreements with National Highways (NH), and formally submit significant new evidence regarding M5 Junctions 12, 13 and 14.

As you will no doubt recall, your concerns around the soundness of the SDLP, centre around the “reasonable prospect” of securing central government funding to deliver two major motorway upgrades early in the Plan period. You also cited a lack of agreement with NH on the sites which could come forwards without an impact on the M5 Junctions 12 or 14, as a concern with the evidence base. This new NH evidence fundamentally alters the previous understanding of infrastructure requirements and their relationship to planned development in the SDLP, which SDC (Stroud District Council) considers addresses your previous concerns. National Highways (NH) has now completed extensive and detailed modelling to assess the timing of necessary improvements to these junctions, and the level of housing which could come forwards without upgrades, fully in line with the assumptions and policies set out in the emerging SDLP.

For your consideration, we are submitting three technical reports which present the modelling outcomes in complete detail.

### **Overview**

The three modelling reports present the outcomes of micro-simulation modelling of incremental traffic growth from SDLP development on each of the motorway junctions. The SDLP development flows are derived from the SDLP Strategic Traffic model, and were used in developing the Housing Trajectory work presented by SDC in December 2024. The purpose of the modelling has been to use micro-simulation to assess the timing point for if/when a major motorway junction upgrade would be needed.

### **Summarised Findings by Junction**

*Leading a community that is making Stroud district a better place to live, work and visit for everyone*

Chief Executive: Kathy O'Leary



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## M5 Junction 12

The new NH traffic flow modelling, which incorporates the development proposals contained within the SDLP, demonstrates conclusively that the Strategic Road Network (SRN) at M5 Junction 12 currently possesses sufficient capacity to operate without requiring any mitigation measures until 2031. This is an updated NH position from “early in the plan period”, as previously presented at EiP. Evidently, the availability of an additional six years significantly enhances the “reasonable prospect” of achieving central government funding in order to deliver the M5 Junction 12 upgrade scheme.

SDC presented analysis to the Local Plan EiP (termed “Appendix 2AC”), which demonstrated the level of housing which could be delivered in different infrastructure scenarios. SDC’s analysis presented a scenario which showed what level of housing could be delivered without sites which have an impact on J12, i.e. a scenario where capacity at J12 becomes a barrier to housing delivery. This excluded G1 South of Hardwicke, G2 Land at Whaddon, and PS30 Hunts Grove Extension (these being the sites identified in the IDP to fund the improvement at M5 J12). This evidence showed that 105% (13,227 of a need of 12,600, 2020/21 to 2041/42) of SDC’s housing need could be delivered without these sites. SDC understands that the Inspectors were not able to have confidence in this evidence as NH did not previously accept it. NH has now confirmed that it accepts that the SDLP can be delivered up to 2041 without the need for a J12 upgrade, if the aforementioned sites are not included. Thus, coupled with the conclusions on J13 and J14, it is evidently common ground between NH and SDC that 105% of SDC’s housing need can be delivered without a J12 upgrade.

This alignment between SDC and NH represents a major step forward in achieving consensus on mitigation, timing and ultimately the ‘reasonable prospects’ of delivery.

The modelling does highlight potential localised congestion, while this matter has been formally raised with GCC (Gloucestershire County Council) as the highway authority, it was always anticipated as part of our modelling and mitigation needs are included in the Infrastructure Delivery Plan (IDP). These purely localised issues will be addressed through the normal planning application process as individual SDLP sites come forward for development. This approach is fully consistent with and indeed explicitly referenced in paragraph 2.5 of the GCC Statement of Common Ground (December 2024).

For absolute clarity, this localised congestion in no way represents a fundamental constraint on either the soundness of the SDLP itself or the ongoing EiP process. The Council would strongly emphasise that NH’s current position should be read in conjunction with, and indeed builds upon, the December 2024 Joint Action Plan (JAP) submission. That work set out in considerable detail the agreed collaborative outputs including the proposed junction design parameters, comprehensive costings, and crucially, confirmation of ‘reasonable prospects’ for securing all necessary funding to deliver the Junction 12 improvements when required, albeit the ‘when’ is now agreed to be 2031, rather than early in the plan period.

## M5 Junction 13

For the avoidance of doubt, the appropriateness and deliverability of mitigation to accommodate the SDLP at the M5 Junction 13 is not a matter in dispute. A relatively minor



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scheme has been identified, and the delivery of that scheme is tied to the delivery of the EcoPark development. This is set out in the IDP and agreed by all parties.

The detailed modelling results for Junction 13 confirms that all anticipated traffic growth generated by the SDLP can be properly accommodated on the Strategic Road Network at M5 J13 up to 2040 when considered alongside the proposed local plan growth and associated mitigation measures.

The modelling has therefore reaffirmed, to the complete satisfaction of all parties, that there are no concerns regarding Junction 13's capacity to accommodate development coming forward through the SDLP. This represents an important confirmation of the SDLPs transport infrastructure assumptions.

## **M5 Junction 14**

The Inspectors will be aware from the JAP outputs submitted in December 2024 that an interim scheme has been proposed at Junction 14. The scheme has been in the pipeline for some time, and the position with NH in December 2024 was that this scheme could, in principle, deliver committed development at Charfield (South Gloucestershire) and partial development at Sharpness and Cam. Based on this agreement with NH, SDC calculated that the interim scheme could enable 78% of housing need to be delivered, without grade separated junctions being implemented at J14 and J12. However, NH could not support this analysis of housing trajectory without additional modelling, which has now been undertaken.

In a highly significant development, as of June 2025 NH has formally accepted an interim improvement solution proposed by major developments in Charfield, South Gloucestershire (specifically planning references P19/18237/O for Land North of Wotton Road and P19/2452/O for Land South of Charfield). This scheme benefits from comprehensive technical support including:

- A fully approved Stage 1 Road Safety Audit (RSA)
- Complete GG104 Requirements for Safety Risk Assessment
- Comprehensive Road Restraints Risk Assessment Process (RRRAP) documentation
- Detailed Walking, Cycling and Horse-riding Assessment (WCHAR)

All of these critical assessments have been completed to the complete satisfaction of NH. The scheme and funding will be delivered through a legally binding s278 agreement, with construction required to be completed before occupation of the 38th house on either application site. Thus, there is strong confidence and a reasonable prospect that the interim scheme will be delivered.

Based on additional modelling, NH now officially accepts that this interim solution will not only successfully mitigate all traffic impacts from the aforementioned developments but will also facilitate the delivery of every SDLP allocation affecting Junction 14.



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**For the avoidance of doubt, NH's updated position is that a grade-separated junction improvement at J14 is not required to deliver the SDLP.** NH is currently removing their holding objections from SDLP allocations such as PS24 Cam which are live applications. This updated position definitively removes all outstanding concerns and funding requirements related to Junction 14 and the SDLP.

The Council fully acknowledges that certain localised impacts on the road network may still emerge; in fact these impacts and associated mitigation have already been identified through the SDLP modelling evidence, with mitigation schemes included in the IDP. These will be systematically managed by SDC and SGC (South Gloucestershire Council) through the well-established planning application process. Many of these matters are already under active consideration and have been formally agreed for key SDLP allocations including PS24 Cam, with SGC having already considered the local road impacts and formally confirmed their support for the live planning application.

For absolute clarity, consistent with the established position regarding Junction 12, these purely local highway matters do not fall within the remit of matters to be examined at the Examination in Public (EiP), these are matters that currently are and will be addressed through the Development Management process.

## **Sharpness New Settlement Update**

The Council is aware that the site promoters for Sharpness New Settlement have recently written to you providing additional detailed evidence specifically responding to the concerns raised in your letter of 7 February 2025. While this evidence has not yet been formally accepted or published, we strongly consider that NH's fundamentally revised position regarding M5 Junction 14 should be properly evaluated alongside this further evidence to ensure all soundness considerations are thoroughly and fairly assessed.

## **SDLP Housing Delivery Capacity**

The Council originally submitted detailed Housing Trajectory Scenarios in December 2024 as a key component of the JAP work programme. This important analysis presented several carefully modelled development scenarios that fully accounted for the then-understood capacity constraints at both M5 Junctions 12 and 14.

Following NH confirmation Junction 14 no longer requires the SDLP to deliver major junction improvements and Junction 12 improvements are not required early in the plan period, that work has been superseded.

As a direct consequence of these developments, SDC can now confidently demonstrate an unconstrained housing delivery capacity of 15,164 high-quality dwellings across the plan period based on delivery of the J12 scheme by 2031, for which there is a reasonable prospect. This figure represents 122% of our total housing requirement, providing a significant buffer to ensure delivery. Importantly, even if the J12 scheme were to not be delivered, it is agreed with NH that 13,227 homes (representing 105% of requirement) can be delivered by following the housing trajectory but excluding those sites which are identified in the IDP as having an impact on Junction 12. This further underlines the robustness of our supply.



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## Formal Request to Inspectors

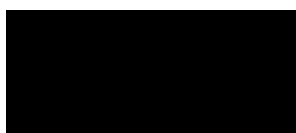
In light of this comprehensive new evidence, which fundamentally transforms the highways mitigation context of the SDLP, SDC respectfully requests that the Inspectors:

1. Give full and proper consideration to this updated evidence before reaching any final conclusions on the plan's soundness; and
2. Agree to reopen hearing sessions to thoroughly examine these material changes in circumstances.

The soundness of the Stroud District Local Plan must properly be determined on the basis of the most up-to-date, technically robust and fully agreed evidence available. Through intensive collaborative working, SDC, NH, GCC and SGC have now resolved all major highways soundness concerns that were previously identified. The plan now presents beyond doubt, a credible, fully deliverable strategy for sustainable growth that will meet our communities' needs while protecting our environment. Your concerns have been addressed giving the opportunity for you to reassess your recommendation. The alternative of not adopting a local plan will impact a generation of families in our district and it would not be a consistent with the evidence and information that is available to you; and indeed the realities of the housing market and the Development Management system

We trust you will recognise both the importance of this new evidence and its material implications for the examination process. We remain at your disposal to discuss any aspect of this submission in greater detail and look forward to your formal response at the earliest opportunity.

Yours sincerely



Kathy O'Leary  
Chief Executive