

Date: 5th May 2026

Dear Inspectors Lucas and Wright,

South Gloucestershire Council welcomes the opportunity to comment on the SDC Inspectors' additional questions relating to Stroud District Council's letter dated 11 July 2025, and the submission of three technical reports on the Strategic Road Network (SRN) published by National Highways as set out in your letter of 25th March 2026.

Having considered the questions raised, the Council's response to questions asked in relation to the Evidence Base (questions 1-10) and the Overarching questions (questions 11-17) are set out below. We would also request this is read alongside our previous response dated 23rd October 2024.

For further context, the South Gloucestershire Local Plan is currently at Examination, with the hearings commencing on 19th May. The Plan allocates 775 dwellings at Charfield in two allocations, which is consistent with our letter of 23rd October 2024. For information details are set out below:

- P19/2452/O, Land South of Charfield - A phased mixed-use development of up to 525 residential units (Use Class C3, including affordable homes and Use Class C2/C3 housing suitable for the elderly) - received resolution to grant in June 2025 subject to conditions and completion of a s106 agreement. The s106 is currently being finalised.
- P19/18237/O, Land North of Wotton Road, Charfield - Hybrid planning application for phased development of up to 250 dwellings with associated development - received resolution to grant in March 2025 subject to conditions and completion of a s106 agreement. The s106 is currently being finalised

A SoCG supporting the South Gloucestershire Local Plan at Submission was agreed with SDC and is available on our Examination website site [CoreDocuments.pdf](#) see table 3, reference SoCG /06 (paras 4.12 -4.16).

Questions on the Evidence Base

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?

SGC response: That reflects our understanding

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?

SGC response: If the junction improvements are not delivered in a timely manner – i.e. at or close to the beginning of the developments, then the local highway network would fail, as would Junction 14. The level of failure is such that there would be safety implications for the SRN, and congestion on the LRN that could be considered to be severe.

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).

SGC response: this relates to development much further from the boundary with SGC and therefore unlikely to have as significant an impact. We have no additional comments to make.

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?

SGC response: South Gloucestershire Council considers that the SDC Local Plan developments closer to the SGC boundary that affect the operation of J14 and have been modelled and identified to require improvements to J14 and the surrounding LRN, changes are required. It is therefore crucial that this work is undertaken as the reduction in the level of SRN mitigation is not commensurate with any reduction in housing.

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.

SGC response: SGC is satisfied that the modelling undertaken is comprehensive and covers the transport impact issues raised with regard to the SRN/ at J14. However the Council considers that further work is required to fully understand the impacts on the LRN with regard to the A38/B4509 junction and where applicable on the B4058/B4059. In particular the impact of the fuller development at Sharpness needs further consideration. The Council is supportive of continuing to work with all partners to resolve these matters but currently seeks to reserve its right to request further modelling and consideration of potential mitigation as appropriate and necessary, through the development management processes.

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?

SGC response: The directly influencing planning applications within SGC at Charfield (Land South Of Charfield P19/2452/O, and Land North Of Wotton Road, Charfield P19/18237/O / P22/04260/O – all subject to S106 agreements), as identified above and at Thornbury (Land West of Park Farm PT18/6450/O

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consented via appeal), have conditions that require the implementations of Jn14 improvements as well as related surrounding LRN schemes. SGC would require this for future developments.

The Land West of A4135 Draycott, Cam development in Stroud S.21/1875/OUT also approved via appeal inquiry, requires the Charfield improvements to J14 as well as additional measures, as set out in the Inspector's decision condition 47.

47) No more than 153 dwellings within any phase of development hereby permitted shall be occupied until the M5 Motorway Junction 14 Improvement Scheme identified to support South Gloucestershire applications P19/18237/O and P19/2452/O on Norman Rourke Pryme Drawing No. 7815-001 Revision 7.0 annexed hereto, has been completed and is fully operational.

SGC is therefore satisfied that in planning terms the mitigations can be conditioned and implemented with regard to implementing the Charfield scheme at J14 through the development management process, noting the Council seeks to reserve its right to request further modelling and consideration of potential mitigation as appropriate and necessary for the LRN (A38 junction and B4058/4059), impacted in SGC through the development management processes.

Q7 and Q8 relate to J12 and J13 and SGC have no comment to make.

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?

SGC response: SGC agrees that the "interim scheme" with the amendments provided by the Cam development referenced in our response above to Q6 allows for those developments to come forward. We understand that the initial phase (1,000 dwellings) of the Sharpness development is also catered for by the interim scheme in terms of the operation of J14. Within this context we therefore agree that a double bridge grade separation is not required. As the "interim scheme" single bridge grade separation is sufficient. However, the Council understands a full junction upgrade (i.e. two bridges) will be potentially required if any more housing is allocated affecting the junction, and additional works will be needed off site on the A38 / B4059/B4058 routes serving the junction.

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?

SGC response: The J14 "interim scheme" has been added to by the Cam development as detailed in our response to Q6. This helps with the operation of the local road network as without this infrastructure changes there would be a significant and in our view, severe increase in congestion on the A38 as it approaches the B4059 towards J14. The influence on the LRN of the Sharpness development is not currently clear and requires further work. The Council therefore reserves the right to request further modelling and consideration of potential mitigation as appropriate and necessary for the LHN (A38 junction and B4058/4059), impacted in SGC through the development management processes.

There is a live planning application at Land North of Oldbury Lane Thornbury, also named Spring Farm, and Oldbury Orchards, P25/02677/O for 350 dwellings which NH have commented on and are content that

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the “interim scheme” can manage this additional traffic. In LRN terms, there are ongoing transport assessments of the impact at specific junctions within Thornbury and closer to J14.

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?

SGC response:

The influences on J14 within SGC include:

At Thornbury:

- Land West of Park Farm [PT18/6450/O](#) (consented via appeal), requires the implementation of J14 slip road improvements (northbound off slip lengthening and widening). The timing is triggered by development build out and works have been started I understand.

At Charfield (within SGC):

- Land South of Charfield [P19/2452/O](#), and
- Land North of Wotton Road, Charfield [P19/18237/O](#) / [P22/04260/O](#) – all subject to S106 agreements)

These developers designed a combined mitigation that NH (and SGC) are satisfied with to mitigate their influence at J14. The implementation will be conditioned on build out thresholds rather than a set date or year. Whilst the Charfield developments have approval at Committee, these are subject to S106 details which SGC officers understand are currently being worked on.

Within Stroud:

- The Land West of A4135 Draycott, Cam development in Stroud [S.21/1875/OUT](#) also approved via appeal inquiry, requires the Charfield improvements to J14 as well as additional LRN (local road network) measures of improvements to the B4509 (additional lane from the A38 to J14), and the A38/B4509 signalised junction itself. These were conditioned in the Inspector’s decision (condition 47 set out in Q6 above).
- The Sharpness development (Land at Sanigar Lane, Newtown, Berkeley [S.25/0417/OUT](#)) is not determined / is at the planning stage and does not provide sufficient information about the LRN impact of its 2,750 dwellings. It is understood that 1,000 dwellings can be accommodated at J14 but the impact of 1,000 dwellings or of the full 2,750 dwellings is not clear on the operation of LRN.

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

SGC response:

No, we are not aware of any schemes.

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.

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SGC response: Other than the issue relating to Q17 and the Sharpness allocation, the modelling, assessments and resulting proposed mitigations are considered adequate. However the Council considers that further work is required to fully understand the impacts on the LRN with regard to the A38 junction and on the B4058/4059. The Council is supportive of continuing to work with all partners to resolve these matters but currently seeks to reserve its right to request further modelling and consideration of potential mitigation as appropriate and necessary, through the development management processes.

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?

SGC response: It is currently the case within SGC with on-going speculative development that planning obligations are required to ensure that highway safety and severity measures are appropriately addressed and mitigated. In this context the Council considers the scale of the SDC Local Plan proposed development however goes beyond those approaches and will need appropriate consideration through the local plan allocation, master plan and development management process to ensure the scale of necessary contribution for offsite works across local authority boundaries is represented.

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?

SGC response: It is considered that the issues that have been highlighted by the updated evidence have been addressed.

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.

SGC response: As per comments made above, the Council reserves its right to seek to identify appropriate and necessary additional modelling needed to identify LRN improvements along with the precise scale and nature of those works and supporting financial contributions. Subject to agreement of parties, the Council considers this can be undertaken through the development management process.

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?

SGC response: We would defer to National Highways, however our understanding is that the impact of the fuller development at Sharpness needs further consideration.

Yours sincerely

Patrick Conroy
Strategic Planning Policy and Specialist Advice Manager
South Gloucestershire Council

Department for Place, South Gloucestershire Council,
PO Box 1954, Bristol BS37 0DD