



STROUD DISTRICT COUNCIL

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

By email

30th November 2023

Dear Ms Lucas and Ms Wright,

Stroud District Local Plan Review Examination

Thank you for your letter dated 24 October 2023, and subsequent extension of the response deadline to 30 November 2023 to enable constructive collaboration between all parties. We understand from your letter that you require responses from Stroud District Council (SDC) and parties with regards to the following topics:

- A Scheme Sponsor for M5 Junction 14
- A Joint Action Plan
- Evidence on the level of housing that can be delivered prior to requiring schemes at Junctions 12 and 14.

SDC is pleased to be able to report significant progress on a number of key matters in relation to the above. This has been achieved through extensive collaboration with National Highways (NH), South Gloucestershire Council (SGC) and Gloucestershire County Council (GCC). SDC is confident that a brief pause in Examination to allow further technical work to be carried out will deliver the scale of progress required to enable the Examination to re-open and continue towards a positive conclusion.

Scheme Sponsor

Your letter correctly states that GCC has offered to act as scheme sponsor for further work relating to J12. GCC has agreed to be scheme promoter for the scheme development phase. This includes concept design development, developing the junction costing, consideration of a cost apportionment model, and investigating/securing wider sources of funding. GCC and SDC have agreed a cost share arrangement for this work. GCC is likely to take the scheme promoter role for future stages e.g. Outline Business Case, to be confirmed following the successful conclusion of this stage, as is typical for delivery of major infrastructure schemes.

Since previous correspondence on the matter, high level discussions have taken place between SDC, NH and SGC with regards to the potential improvement of J14. SDC is prepared to act as the equivalent scheme sponsor role for J14. This could include funding the technical work required on concept design development and junction costing, undertaking the cost apportionment exercise and investigating/securing the wider sources of funding.



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Joint Action Plan

An agreed Joint Action Plan (JAP) has been prepared and is appended to this letter. The JAP builds on the Action Plan prepared originally by SDC (September 2023) and provides updated agreed timescales. The JAP identifies the roles that each party has agreed to, both in the task list and as an introduction to the table. The tasks identified are agreed, the roles and ownership for each is assigned, a realistic timetable is set out, and resources are in place to deliver the JAP.

The task list for collaboration, design, costing and apportionment as set out in the original Action Plan is agreed and has been carried through to the JAP. GCC and its consultants have prepared the timetable for the design and costing of potential improvements to J12. SDC and its consultants have done the same for the potential J14 improvements, for Impact Assessment, and Funding and Cost Apportionment Exercises. Thus, the timescales have been defined by those undertaking the work, and in agreement with the relevant stakeholders. NH will work constructively and collaboratively with the parties delivering the work, in a review role. NH has identified its requirements for the outcomes of the work to both SDC and GCC. The JAP as set out will enable these requirements to be met.

Evidence on the level of housing that can be delivered prior to requiring schemes at Junctions 12 and 14.

The Inspectors have requested that GCC and NH provide a response to the SDC Technical Note dated 16 October 2023. SDC has been working closely with GCC and NH to provide technical clarification where required and assist understanding.

As the Inspectors will recall, the purpose of Appendix 2AC6 was to identify a housing trajectory which would be achievable, excluding housing sites identified within the IDP which would require the improvement of Junctions 12 and 14. The IDP is an Evidence Base document submitted to the Examination, and no objection to the sites included within the IDP in relation to Junctions 12 or 14 was received from NH or GCC. The Technical Note which was provided to the Inspectors with the letter of 16 October 2023 explains the basis of the assessment that the trajectory set out in Appendix 2AC6. SDC considers that Appendix 2AC6, founded as it is on the agreed evidence base for the Local Plan Examination, provides a reasonable indication of the level of housing trajectory which could be delivered by housing sites which would not have a significant effect upon J12 or J14 which would require mitigation.

With the Local Plan in place, all applications for planning permission would need to demonstrate that they can come forward on a basis which accords with the transport policies in the Local Plan. This would be the case even for an allocated site. The judgment to be made as to whether or not a scheme accords with policy would be taken having regard to the circumstances as they exist at the time. This would include consideration of cumulative effects. It follows that the mere allocation of a



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site now does not mean that the transport impacts of that site will inevitably be acceptable or policy compliant when an application for planning permission for that is considered. Thus, the allocation of sites now which are not considered as likely to give rise to unacceptable adverse impacts on J12 or J14 at a strategic level does not prejudice the development management process for sites within the District, or indeed in Neighbouring Authorities. It is an entirely proportionate approach for a Local Plan to model at strategic scale, and each planning application coming forwards will need to provide a site specific Transport Assessment demonstrating its impact on the transport network.

Discussions with GCC and NH have identified that it is appropriate to verify the work undertaken to support the trajectory set out in Appendix 2AC6 by reference to traffic modelling for an interim year. This modelling will reinforce the work already undertaken. SDC has worked collaboratively with NH to agree the parameters for these further interim year assessments. The further modelling work will be led by NH and is included within the Joint Action Plan. This will occur alongside other tasks and can be delivered well within the timeframe of the JAP.

National Highways has requested clarification on how sites included within the SDLP, but with a “severe” impact on Junctions 12 or 14, would be prevented from coming forwards until an acceptable solution has been delivered. Appendix 5AC19 to the Local Plan identifies potential modifications to the wording of the Local Plan proposed by SDC to address questions raised by National Highways. These modifications to Policy explicitly require contributions from specific allocations to M5 Junction improvement schemes, and contributions from any other developments which have a material impact on strategic infrastructure. The policy link between infrastructure delivery and development impact is therefore clearly made.

Further, any scheme which would have a severe impact on the network would be contrary to paragraph 111 which provides that development should be refused if its residual cumulative impacts would be severe.

Schemes which would be acceptable once the improvements are in place, can be subject to conditions/planning obligations preventing occupation until improvements have been delivered.

As the Plan proceeds through Examination, SDC remains willing to discuss further modifications if deemed necessary to strengthen this link. However, SDC’s current position is that the link is clearly made, and if a site is demonstrated through the planning process to have a severe impact on a motorway junction, then the Local Plan and NPPF provide adequate Policy basis for refusal of planning permission or the imposition of necessary controls to prevent sites coming forward until a solution has been provided. SDC will continue to work constructively with developers and site promoters to advise on the status of the Plan, and to bring any sites forwards in the context of the adopted Development Plan.



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Conclusion

In conclusion, SDC is happy to be able to report the substantial positive progress on the matters raised in your letter of 24 October 2023. We consider that a structure is in place, with tasks, roles, responsibilities, timescales and resources committed, enabling efficient and constructive progress to be made on all the key matters. SDC considers that this demonstrates that a pause in the Examination will be productive and enable the Examination of the Plan to continue positively. SDC considers this to be a pragmatic solution to reaching the common goal of an adopted Plan which proactively plans for economic growth and infrastructure delivery.

Yours sincerely



Kathy O'Leary
Chief Executive