

## Part B – Please use a separate sheet for each representation

Name or Organisation:

Lichfields (on behalf of CEG and the Charfield Landowners Consortium)

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="X"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Lichfields provides planning advice to CEG and the Charfield Landowners Consortium (our Client) in respect of land to the south/west of Charfield within South Gloucestershire. There are a number of important cross boundary issues relevant to the emerging Stroud Local Plan and the proposed allocations to the south of the district.

Our Client has for some years been promoting the Charfield site through the South Gloucestershire development plan process for residential led, mixed use development. An outline planning application (application ref: P19/2452/O)

remains undetermined and we are in continued discussions with South Gloucestershire Council (SGC) and the M5 Junction 14 Working Group.

### **Policy CP13 – Demand management and sustainable travel measures**

Policy CP13 relates to demand management and sustainable travel measures. The policy states proposals for major schemes will be supported where they improve the existing infrastructure network, including roads and in all development cases, *'schemes shall not cause or contribute to significant highway problems or lead to traffic related environmental problems'*. The Plan acknowledges in Section 2 that transport modelling has identified the need for improvement works at J12, J13 and J14 of the M5. The policy therefore needs updating to include reference to the need for this critical infrastructure.

The transport impacts of the proposed strategic sites to the south of the district has been considered through the Mott Macdonald Traffic Forecasting Report (March 2021). The report confirms that traffic generated by the allocation sites at Sharpness, Cam and Dursley and the employment site at Land west of Renishaw New Mills (9 ha) are all likely to use Junction 14 to access the Strategic Road Network. The Report therefore confirms that a substantial upgrade of Junction 14 within 'Preferred Highway Mitigation' will be required. Page 84 of the report summarises this as:

*Very High cost schemes (>£10m) M5 Junction 14 – replacement of existing single overbridge diamond interchange with new grade-separated signalised roundabout.*

CEG's consultant Evoke has undertaken extensive modelling work on the junction and the options for improvement (further detail is provided within the Transport Assessments submitted as part of planning application Reference: P19/2452/O). This has confirmed that the cost of the proposed Junction 14 improvement works is anticipated to be c.£50m. This is therefore a significant issue that requires detailed consideration in the draft plan.

The Stroud Sustainable Transport Strategy (STS) (Aecom report February 2021) proposes measures to deliver a future modal shift though these will not be adequate to address existing capacity issues at Junction 14. There will be significant residual impacts from proposed Stroud growth on this junction that needs to be addressed through the plan. It is without question that the junction requires a significant upgrade even with sustainable transport measures deployed.

We reserve the right to provide further technical detail from Evoke (CEG's transport consultant) in relation to Junction 14 at the Examination of the Plan in response to the Inspector's inevitable questions on this matter.

At present, we do not consider that policy CP13 is sound. Without considering in further detail the cumulative impact of development on the highway network and the specific infrastructure to deliver those sites, this policy will not achieve sustainable development. It is therefore not considered to have been positively prepared and is not consistent with the NPPF in relation to the test of soundness (paragraph 35). We also consider the policy is not supported by sufficient evidence of effective joint working on cross-boundary strategic matters with South Gloucestershire and for this reason we also consider the policy is not justified or effective.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy CP13 and its explanatory text must be updated to include reference to the need for critical infrastructure on the Strategic Road Network including Junction 14 of the M5.

The impact of strategic growth on Junction 14 must be fully tested taking into account cumulative growth in neighbouring local authority areas. More detail is also required in relation to the form of the mitigation proposed; the cost of the works; how these major infrastructure improvements will be funded with the level of funding anticipated from the strategic development sites clarified.

The plan and specifically policy CP13 should make it clear that no development should come forward until Junction 14 infrastructure has been design and costed, agreed with Highways England and the other members of the Working Group, and the works implemented.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to participate in the Examination in Public in order to be able to elaborate further on our position and the matters raised above particularly in relation to Junction 14 of the M5.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date: