

## Stroud District Local Plan Review Examination

### Gloucestershire County Council (GCC) officer response to the additional questions relating to Matter 11 and the latest evidence published by National Highways (NH) (JUNE 2025), dated 25 March 2026:

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?

Yes. GCC's understanding is that the transport modelling undertaken to support the submitted SDLP assumed full delivery of the planned housing and employment growth, with major strategic improvements at M5 Junctions 12 and 14 intended to be implemented during the Plan period to support that level of growth, as reflected in the Infrastructure Delivery Plan (IDP).

The Strategic Modelling also assessed a scenario of Do Something (i.e. with LP development), without mitigation. This highlighted that mitigation was required, and therefore capacity improvements were included in the with mitigation scenario.

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?

Our understanding is that SDC's position is that they can deliver 105% of their housing requirement (13,227 homes). (The original plan proposed 15,164, representing 122% of the total housing requirement).

The National Highways assessments focus on the operation of the Strategic Road Network (SRN) and do not consider the operation of the local highway network (LHN). On that basis, GCC does not consider that the impacts of planned growth, in a scenario where motorway junction improvements are not delivered in advance of growth, have yet been adequately assessed under the revised NH assumptions. Given the potential for redistribution of traffic onto the local road network, there is a risk of increased congestion and associated impacts at key junctions and corridors, i.e. A38 corridor, Cross Keys, etc. Further assessment of the local highway network would therefore be required to fully understand the implication of this scenario.

#### 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).

The acceptability of the impact on J12 will be commented on by NH but as noted above the impact on the Local Highway network has not been assessed as part of the additional evidence provided. Though as stated above, a 'Do Something' scenario was modelled.

The exclusion of site allocations G1, G2 and PS30 may reduce traffic demand in the vicinity of M5 J12 and could delay the requirements for strategic junction improvements. From GCC's perspective, the acceptability of this approach would depend on whether the Plan continues to meet development needs to 2040 and whether any redistributed vehicular trips can be accommodated elsewhere as people may choose different routes if there is less traffic overall. SDC's position is that they can deliver 105% of their housing requirement (13,227 homes). However, should growth over and above this be required, any redistribution of growth could place additional pressures on different part of the local highway network, including corridors and junctions not previously identified as requiring mitigation. It may also affect the timing and delivery of planned transport infrastructure particularly where the removed sites were expected to support a wider package of transport improvements.

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?

A scenario with partial build out and delayed SRN mitigation has not been directly assessed in the relation to the LHN.

The original traffic modelling was based on assumptions that the full quantum of planned growth would be delivered and was tested under scenarios both with and without strategic improvements at M5 J12 and J14. If these assumptions change, with less growth being delivered and the junction improvements are no longer required within the Plan period, this will alter the basis on which the modelling was undertaken. This is likely to affect how traffic is distributed across both the SRN and LHN. As a result, the existing modelling may not fully reflect these revised assumptions, and further assessment may be needed to ensure that the impacts on the local highway network are robustly understood.

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.

Further evidence would be necessary to assess the cumulative impact on the LHN. This may identify the need for additional mitigation on the LHN which could then require further assessment by NH.

The existing modelling was undertaken based on the full delivery of the Plan and included scenarios without mitigation and with mitigation, including strategic improvements at M5 J12

and J14. As these assumptions have now changed, the current modelling no longer reflects the likely impacts on the highway network. GCC therefore considers that the current modelling should be revised to test scenarios that reflect the updated position.

The revised modelling scenarios should consider no major SRN upgrades within the Plan period, delivery of a reduced level of growth, and the potential removal of site allocations G1, G2 and PS30. The modelling work should assess how traffic would redistribute across both the SRN and LHN and identify impacts on key junctions and corridors within the LHN as well as the potential need for mitigation. The scope and timing would need to be agreed between relevant authorities, but it is likely to involve an update to the existing modelling to reflect these revised assumptions.

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?

Local highway impacts could, in principle, be addressed through the planning process, including through planning obligations, conditions and site-specific mitigation. However, reliance on the development management process alone is unlikely to fully address the cumulative impacts of planned growth across the network. Individual applications are considered on a site-by-site basis and may not pick up the combined effects of the Plan allocations, particularly where wider infrastructure improvements are required.

In this context, a plan-led approach is important. The Plan, supported by its transport policies and the Infrastructure Delivery Plan (IDP), provides the strategic framework for understanding cumulative impacts and coordinating the identification and delivery of mitigation across multiple allocation sites.

In relation to delaying improvements at M5 J12, or changes to the timing or delivery of improvements at M5 J14, further assessment would therefore be required to understand any resulting effects on the local highway network and whether they can be satisfactorily mitigated through the planning process.

10. The J12 report identifies significant congestion at the Cross Keys roundabout located to the west of J12.

Q7: What improvements are planned at the Cross Keys roundabout, when are they proposed to be implemented and how would they impact on the operation of J12 and the local highway network? Has this been considered in the traffic Modelling?

The Cross Keys roundabout has been improved through a phased programme of works. Phase 1 was delivered by GCC and completed in 2019, providing increased capacity and layout enhancements, including widened approaches and improved circulatory capacity. Phase 2 comprises further localised highway works secured through development funding as the final phase of the wider Hunts Grove development, including signalisation on the A38 and the A430 approaches, and is expected to become operational shortly. The overall scheme was intended to improve capacity at the roundabout, improve traffic flow along the A38 corridor, and

reduce interaction and queuing effects associated with M5 J12. The improvements at Cross Keys were included within the original traffic modelling undertaken to support the Plan.

The National Highways M5 J12 assessment is focused on the operation of the SRN. National Highways would therefore be best placed to clarify the local network assumptions applied in their assessment, including whether the current Cross Keys improvement scheme has been assumed.

11. We understand that J13 can accommodate the planned growth identified within the submitted Plan, in line with the mitigation identified in the IDP.

Q8: Is our understanding correct and do you agree with this statement?

Yes. Based on the evidence current available, GCC agrees that M5 Junction 13 can accommodate the planned growth identified in the Plan, subject to the delivery of the mitigation measures sets out in the Infrastructure Delivery Plan.

National Highways would therefore be best placed to confirm the operation of the junction in relation to SRN.

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?

Based on the evidence current available, it is understood that the National Highways assessment concludes that the proposed interim Charfield scheme at M5 J14 would allow the planned growth affecting J14 to be accommodated without the immediate need for a grade-separated junction.

National Highways would therefore be best placed to confirm the detailed operation and performance of J14 in relation to the interim scheme, noting that the assessment relates to the specific level and distribution of growth tested within the assessment, principally associated with the Charfield development.

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?

The National Highways J14 assessment is focused on the operation of the SRN and do not consider the operation of the local highway network (LHN). Notwithstanding this, GCC has not objected to recent planning applications in this area based on the information submitted and the assessment of individual applications at the time, noting that these assessments have been undertaken on a site-by-site basis and do not necessarily address the cumulative effects of planned growth across the wider area.

Any conditions applied to those applications were requested by National Highways in relation to the SRN operation, including restriction on occupation until the interim scheme is delivered, rather than by GCC in its role as local highway authority. Should further assessment identify adverse local impacts, GCC considers that these could, in principle, be addressed through the planning system, including targeted mitigation and the use of planning conditions or developer contributions.

13. Our 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?

From GCC's perspective as Local Highway Authority, planned growth during the Local Plan period is expected to place pressure on M5 J12 and the surrounding local highway network within Gloucestershire, including the A38 corridor and associated junctions. GCC considers that local highway improvements, as outlined in the IDP, will be required to support the planned growth in this area, regardless of whether larger SRN schemes are delivered within the plan period. National Highways would be best placed to advise on the need for, and timing of, any improvements at M5 J12 itself.

M5 Junction 14 lies outside the jurisdiction and area of direct influence of Gloucestershire County Council. GCC's interest in J14 is therefore limited to potential cross-boundary effects on the Gloucestershire local highway network. National Highways would be best placed to confirm whether the interim Charfield scheme is sufficient beyond the Plan period and whether any further junction improvements are required.

The scope and timing of any local highway improvements necessary to support planned growth will depend on further assessment, funding availability, and the outcomes of additional modelling to reflect revised growth and infrastructure assumptions. Accordingly, GCC cannot specify definitive delivery timelines at this stage.

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

GCC considers that the Infrastructure Delivery Plan already identifies the principal local highway schemes required to support planned growth, including improvements along the A38 corridor and at key local junctions such as Cross Keys. At this stage, GCC does not consider that additional new local highway schemes need to be identified for inclusion in the IDP beyond those already referenced.

However, considering the updated Strategic Road Network evidence and the current uncertainties regarding impacts on the local network, GCC considers it important that the IDP retains flexibility to allow for refinement of scheme scope, phasing, and prioritisation as further assessment and modelling work is undertaken. This will help ensure that the identified schemes remain relevant, appropriate, and effective in mitigating local highway impacts arising from planned growth.

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.

From a local highway authority perspective, GCC does not consider that the impacts of planned growth on the local highway network have been fully assessed or sufficiently understood in light of the updated Strategic Road Network evidence.

While the NH assessments are valuable in relation to the SRN, they do not in themselves provide sufficient certainty regarding consequential impacts on the local highway network. The new evidence alters some of the assumptions that previously underpinned the wider transport evidence base, particularly in relation to the assumed delivery and nature of improvements at M5 J12 and J14. Consequently, there remains uncertainty regarding the implications for congestion, journey time reliability, and resilience on the local highway network, including at locations where the local and strategic networks interact.

In a scenario where there is an adopted Local Plan in place, we can use the development planning process to request cumulative modelling. However, if there is no adopted Local Plan in place, assessment is restricted to individual site assessment, potentially overlooking wider network impacts.

GCC therefore considers that further assessment is required to provide confidence that local transport impacts are adequately understood and to inform consideration of the Plan's soundness. The scope and timing would need to be agreed between relevant authorities, but it is likely to include updating existing modelling to reflect these revised assumptions.

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?

GCC considers that local highway network impacts, where clearly identified and appropriately evidenced, could in principle be addressed through the planning system. This may include the use of planning conditions, developer contributions, and the delivery of targeted local mitigation measures. Where impacts arise cumulatively across multiple allocation sites, the IDP provides a framework for identifying and coordinating locally required highway mitigation to be secured through the planning process.

In relation to delaying major improvements at M5 J12 beyond the Plan period, and on the context of the interim scheme at J14, it remains important to understand the resulting impacts on the local highway network, including the redistribution of traffic onto local corridors and junctions. At present, given the uncertainties arising from revised growth assumptions and changes to Strategic Road Network mitigation, GCC cannot conclude that all potential local impacts under these scenarios could be satisfactorily resolved through the planning system alone. Further assessment would therefore be required to determine whether appropriate mitigated can be identified and delivered.

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?

From a local highway authority perspective, the updated NH evidence does not identify any additional new impacts on the LHN, noting that it is based on traffic flows taken from the existing Plan modelling and is focused on the SRN.

However, the updated evidence relating to M5 J14 may have wider implications, given that the interim scheme has been tested against a limited level of development.

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.

GCC considers that further proportionate transport evidence would be helpful to inform the Examination. This should include the revised modelling referred to in response to Question 5, to update growth and infrastructure assumptions. Further work should also review whether the local highway mitigation identified in the current evidence base and IDP remains appropriate under those revised assumptions.

The purpose of this work would be to ensure that local highway impacts are properly understood, and that suitable and deliverable mitigation can be identified where necessary.

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?

GCC understands that additional transport modelling has been requested in connection with a live planning application for the Sharpness site allocation (PS36) by the relevant highway authorities, including GCC, and that this work is currently being progressed through the statutory consultation process.

Whilst the outcome of this work may be informative to the Examination, it is application-specific evidence prepared by the developer as part of their Transport Assessment for the proposed development. It should not be relied upon as a substitute for the wider transport evidence required to examine the soundness of the Plan.

At this stage, GCC does not consider that any further transport evidence base or traffic modelling is required specifically in relation to PS36 for the purposes of the Examination.