

Stroud District Local Plan Review Examination

Inspectors: Victoria Lucas LLB MCD MRTPI and
Yvonne Wright BSc (Hons) DipTP MSc DMS MRTPI

Programme Officer: Charlotte Glancy

Email: bankssolutionsuk@gmail.com

Tel: 01903 776601 Mobile: 07519 628064

Ms Kathy O'Leary

Chief Executive
Stroud District Council

Sent by email

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Dear Ms O'Leary

Stroud District Local Plan Review Examination

1. Thank you for your letter dated 11 July 2025. We have carefully considered its contents and are now writing to provide our response.
2. Firstly, we would like to acknowledge the progress made through the joint working between Stroud District Council (SDC) and National Highways (NH) and the updated evidence reports submitted. This is a positive step and represents a good foundation on which to resolve the concerns we have highlighted throughout this Examination regarding the impacts of planned growth arising from the Plan on the strategic road network.
3. In the interests of clarity, the NH reports that we refer to in our letter are: M5 J12 Stroud District Local Plan Capacity Assessment June 2025; M5 J13 Stroud District Local Plan Capacity Assessment June 2025; M5 J14 Stroud District Local Plan Capacity Assessment June 2025. These reports are available to view on the Examination website. Whilst progress has undoubtedly been made, there remains several key concerns which we outline below.
4. The updated evidence published by NH indicates that the M5 J12 improvement would need to be operational and open to traffic by 2030

to accommodate planned growth arising from the Plan. However, if several site allocations were excluded (specifically G1 (south of Hardwicke), G2 (Land at Whaddon), and PS30 (Hunts Grove Extension) then there would be no need for mitigation to be provided at J12 until 2040. Planned growth can be accommodated within J13 in line with the scheme identified in the Infrastructure Delivery Plan and this reflects our understanding throughout the Examination process.

5. We understand that NH has accepted an interim scheme at J14 in connection with the Charfield planning application and this would allow for all planned growth arising from the Stroud Plan to be accommodated at J14 without the need for a grade separated junction to be provided.
6. In summary, it appears that NH has updated its position on J12 and J14 (although we have yet to receive formal confirmation directly from NH regarding this). Nevertheless, the updated evidence raises several potential soundness issues that we would need to consider. Not least, the deletion of several housing allocations and the implications of that for the extent to which the plan provides for meeting the identified housing need for the district. This work would need to be subject to a public consultation exercise and further discussion during a subsequent hearing session.
7. NH's reports state that it has not considered any impacts of congestion on the local highway network and highlight that this needs to be brought to the attention of Gloucestershire County Council (GCC) and the relevant district councils. Whilst noting your comments on the point, we consider that the impact of planned growth on the local highway network is likely to be an important consideration in assessing the soundness of the plan. It may be that previous agreements existed between SDC, GCC and other relevant neighbouring Local Planning Authorities that local congestion issues could be dealt with via the planning application process. However, any such agreements were reached prior to the publication of the recent NH reports. The situation has since changed following the production of this latest evidence and this is a matter that would require further public consultation with relevant parties.
8. Throughout the reports the impact of traffic growth on the local highway network has been flagged as a concern and described as 'significant'. For example, the J14 NH report highlights that whilst the interim scheme would satisfy NH's interests as regards J14 capacity, it would 'result in significant adverse impact on the A38 and B409 local highway network'.

9. The J12 NH report also states that any planned improvements at the Cross Keys roundabout may result in the J12 improvement scheme being required earlier. This is an issue that also would need to be discussed further so that we are able to fully understand any implications arising.
10. The modelling undertaken to support the Plan's evidence base was undertaken on the basis that the junction mitigation schemes for J12 and J14 would be delivered during the Plan period. If those mitigation schemes are not going to be provided, then the assumptions underpinning the traffic modelling will need to be revised and further evidence will need to be produced so that the impacts of planned growth on the local highway network can be understood. It may well be that it would be appropriate to deal with this issue through the planning application process. However, currently there is insufficient evidence available for us (as well as relevant interested parties) to understand the full impact of planned growth on the local highway network without the delivery of the motorway junction improvements. Any work produced would also need to be consulted on and then subsequently discussed at future hearing sessions.
11. In relation to the need for further evidence to be provided, we note that NH have requested additional transport evidence in relation to a recent application submitted to SDC on the Sharpness site (PS36), to include additional traffic modelling. Whilst the consideration of that application is separate to the Examination it is likely that the evidence may well be relevant. We would therefore wish for any updated relevant evidence to be submitted to the Examination for our consideration. This would lead to further delay and the potential need for subsequent public consultation and discussion during a hearing session.
12. Overall, the issues arising from the recent NH reports would require the production of additional transport modelling, further public consultation, the production of a summary of representations and discussion at future hearing sessions. This would all clearly have time implications arising in further delays to the Examination process. Based on the experience of the Examination to date we would expect this process to take approximately 12 months to complete and therefore another pause in the Examination to accommodate this would be necessary.
13. Added to that, when we first wrote to SDC back in 2023 we highlighted the risk that if the Examination were to be prolonged that other evidence base documents would become out of date and would be likely to need updating. Looking through the Examination library there are several key pieces of evidence that were produced some years ago, and we would require these to be reviewed by SDC to determine whether they required an update. The implications of any

updated evidence on the Plan would also need to be carefully considered.

14. Accordingly, whilst we held some hearing sessions during 2023, should relevant evidence require updating it would be necessary to hold these sessions again to ensure that the most up to date evidence has been considered. For example, hearing sessions on housing and employment need and requirement and the site allocations. There are also several hearing sessions that have yet to take place as a consequence of the pause in the Examination. Overall we envisage this could well be tantamount to starting the Examination of the Plan again.
15. As previously stated, the Plan was submitted by SDC to the Planning Inspectorate for Examination on 25 October 2021 and is being examined under the provisions of the 2021 National Planning Policy Framework (NPPF) that were in place at that time and the transitional arrangements set out in revisions to the NPPF since then. Even if the Examination were to proceed following another pause of significant length to undertake the additional processes that we have described; the Plan would likely not be adopted until sometime during 2027. Moreover, given the likely housing requirement figure of this plan if it were to be adopted, the requirements of paragraph 236 of the transitional arrangements of the December 2024 NPPF mean that the Council would be expected to begin work on a new plan under the revised plan-making system as soon as the relevant procedures are brought into force in order to address the shortfall in housing need.
16. Whilst in these circumstances it might be beneficial to continue with the Examination if the plan were likely to be adopted in the next few months, we consider that it is not appropriate when its likely adoption would not occur until 2027.
17. For the reasons outlined in this letter, and our previous letters, we remain strongly of the belief that given the significant length of time that has already elapsed in this Examination, it would not be in the best interests of delivering the homes required in Stroud district by agreeing to further prolong the Examination of the current plan
18. Whilst we have very carefully considered the contents of your letter and have reviewed our previous conclusions in the light of them, unfortunately, for the reasons detailed above, we still consider that withdrawal of the Stroud District Local Plan Review from Examination is the most appropriate way forward.

Yours sincerely,

Victoria Lucas and Yvonne Wright

Inspectors appointed to examine the Stroud District Local Plan Review