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Examination

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Charlotte,

**STROUD DISTRICT LOCAL PLAN REVIEW EXAMINATION
INSPECTORS' ADDITIONAL QUESTIONS RELATING TO MATTER 11 AND THE LATEST
EVIDENCE PUBLISHED BY NATIONAL HIGHWAYS (JUNE 2025)**

Thank you for inviting National Highways to respond to respond to additional questions from the Inspectors set out in their letter dated 25 March 2026. We understand their questions relate to a letter from Stroud District Council to the Inspectors' letter dated 11 July 2025, and the submission of three technical reports on the Strategic Road Network (SRN) published by National Highways.

We have reviewed the Inspectors' letter and provide our responses below.

Paragraph 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. Subsequent modelling undertaken following the Examination hearings confirms that a grade-separated junction improvement at M5 Junction 12 remains necessary to accommodate the full extent of growth identified in the draft Local Plan. Based on the housing trajectory provided by Stroud District Council, this intervention will be required to be operational by 2030.

Further modelling demonstrates that a lesser scheme at M5 Junction 14, hereafter referred to as the M5 Junction 14 Interim Scheme and currently being progressed by the applicants for the consented developments at Land North of Wotton Road (P19/18237/O) and Land

South of Charfield (P19/2452/O), is capable of accommodating the transport impacts of Local Plan growth over the remainder of the Plan period.

Paragraph 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?

The responsibility for the operation and safety of the local highway network rests with Gloucestershire County Council as the local highway authority. On that basis, National Highways has not undertaken an assessment of the likely impacts on the local highway network. Accordingly, this question is a matter for Gloucestershire County Council to consider and address.

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).

National Highways' role is to advise on the transport implications of the Plan as submitted in relation to the strategic road network. Accordingly, we consider this is a matter for Stroud District Council, as the plan-making authority and promoter of the Local Plan, to consider and address.

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?

The responsibility for the operation and safety of the local highway network rests with Gloucestershire County Council as the local highway authority. On that basis, National Highways has not undertaken an assessment of the likely impacts on the local highway network. Accordingly, this question is a matter for Gloucestershire County Council to consider and address.

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.

The responsibility for the operation and safety of the local highway network rests with Gloucestershire County Council as the local highway authority. On that basis, National Highways has not undertaken an assessment of the likely impacts on the local highway network. Accordingly, this question is a matter for Gloucestershire County Council to consider and address.

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?

The responsibility for the operation and safety of the local highway network rests with Gloucestershire County Council as the local highway authority. On that basis, National Highways has not undertaken an assessment of the likely impacts on the local highway network. Accordingly, this question is a matter for Gloucestershire County Council to consider and address.

Paragraph 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 forms part of the local highway network. The responsibility for the operation and safety of the local highway network rests with Gloucestershire County Council as the local highway authority. Accordingly, this question is a matter for Gloucestershire County Council to consider and address.

Paragraph 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. This is subject to delivery of the M5 Junction 13 (SDLPR traffic signal scheme) and the A419 dualling improvement identified in the draft Plan.

Since the Examination was paused and National Highways' technical reports issued, we have been consulted on a number of new planning applications which may result in additional traffic impacts at M5 Junction 13. As is standard practice, should these applications be consented prior to adoption of the Plan, the transport evidence base should be updated to confirm whether the mitigation identified within the Infrastructure Delivery Plan (IDP) remains sufficient to accommodate the cumulative impacts of Local Plan growth, alongside any subsequently consented development.

Paragraph 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?

Yes. We are satisfied that the M5 Junction 14 Interim Scheme will accommodate the impacts of all Local Plan growth at M5 Junction 14 itself.

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 transport modelling undertaken in support of the M5 Junction 14 Interim Scheme indicates that the proposed scheme would result in traffic queues of approximately 1km on the A38 to the west of M5 Junction 14. Given that the A38 forms part of the local highway network, it would be for Gloucestershire County Council and South Gloucestershire Council, in their roles as the respective local highway authorities, to review and comment on the likely impacts of these queues on the operation and performance of their networks.

Paragraph 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?

A grade-separated roundabout scheme at M5 Junction 12 is necessary to accommodate all growth identified in the draft Plan. Based on the housing trajectory supplied by Stroud District Council, this scheme will need to be operational by 2030. National Highways has no update on the funding strategy or delivery programme for the M5 Junction 12 grade-separated scheme, which is a matter for Stroud District Council as promoter of the draft Plan.

National Highways is satisfied that the M5 Junction 14 Interim Scheme is capable of accommodating the impacts of Local Plan growth to the end of the Plan period. National Highways understands that detailed design of the Junction 14 scheme is currently being progressed, with construction proposed to commence in late 2026/2027 or early 2027/2028.

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

- M5 Junction 12 Strategic Improvement Scheme (grade-separated junction), as identified in the draft Plan evidence base.
- M5 Junction 13 (SDLPR traffic signal scheme) and A419 dualling improvement, as identified in the draft Plan evidence base.
- M5 Junction 14 Interim Scheme (noting that, based on the proposed construction start date, this scheme may be delivered in advance of adoption of the Local Plan).

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.

The responsibility for the operation and safety of the local highway network rests with Gloucestershire County Council as the local highway authority. On that basis, National Highways has not undertaken an assessment of the impact of the evidence contained with the National Highways technical reports on the local highway network. Accordingly, this question is a matter for Gloucestershire County Council to consider and address.

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?

The responsibility for the operation and safety of the local highway network rests with Gloucestershire County Council as the local highway authority. On that basis, National

Highways has not undertaken an assessment of the likely impacts on the local highway network. Accordingly, this question is a matter for Gloucestershire County Council to consider and address.

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?

Not in relation to the strategic road network. The responsibility for the operation and safety of the local highway network rests with Gloucestershire County Council as the local highway authority. On that basis, National Highways has not undertaken an assessment of the impact of the evidence contained within the National Highways technical reports on the local highway network. Accordingly, this question is a matter for Gloucestershire County Council to consider and address.

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.

No. However, as is standard practice, the transport evidence base should be updated should any applications which result in impacts on the strategic road network and which are not currently considered within the existing transport evidence base be consented prior to adoption of the Plan.

This is necessary to confirm whether the mitigation identified within the Infrastructure Delivery Plan (IDP) remains sufficient to accommodate the cumulative impacts of Local Plan growth, alongside any subsequently consented development.

Paragraph 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?

National Highways has been consulted, in its role as a statutory consultee to the planning process, on outline application S.25/0417/OUT for a mixed-use residential development of 2,750 dwellings and 10ha of employment land within the boundary of draft Strategic Site Allocation Policy PS36 'Sharpness new settlement'.

In its role as statutory consultee and strategic highway authority, National Highways has requested that the applicant provide further justification of the predicted mode share targets and a cumulative impact assessment to determine the effects of the proposal on the operation of M5 Junctions 13 and 14.

Where a planning application is submitted for an allocated site in advance of the adoption of the Local Plan, National Highways expects the applicant to provide a more detailed assessment of the forecast traffic impacts than that underpinning the Local Plan evidence base. This assessment should be informed by the specific parameters of the proposed development, reflecting the increased level of information available at the application stage.

Our request for further transport evidence is therefore primarily relevant to the determination of the planning application through the development management process and is separate from the test of soundness of the Local Plan, which is assessed at a strategic level against the cumulative evidence base that underpins the Plan as submitted.

We trust the above is useful, but please do not hesitate to contact us should we be able to assist further.

Yours sincerely,



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