



Planning Policy Team
Gloucester City Council
Gloucester
GL1 9FW

Westley Little



Via email: cityplan@gloucester.gov.uk

Direct Line: 0300 470 3559

01 July 2022

Dear Sir/Madam,

GLOUCESTER CITY PLAN - PROPOSED MAIN MODIFICATIONS CONSULTATION, JULY 2022

National Highways welcomes the opportunity to comment on the Gloucester City Plan (GCP) Main Modifications. As you'll be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which around Gloucester comprises the A40 north of Gloucester and the M5, with junctions 11, 11A and 12 just outside of the city's eastern boundary. Whilst parts of the A40 and the three M5 junctions fall outside of the Gloucester Plan area, they provide strategic access to and from the city and development within the Plan area has the potential to adversely affect the SRN, which is recognised within the GCP Transport Assessment report. It is based on these responsibilities that the comments that follow in this letter have been made.

National Highways has been actively involved reviewing the transport evidence base which underpins the Joint Core Strategy (JCS) for Gloucester, Cheltenham and Tewkesbury, and it is understood that the GCP will sit under this wider spatial strategy. The core strategy identifies an integrated package of key transport and highway improvements to both the Local and Strategic Road networks which are necessary, to accommodate the travel demands arising from the development included within the JCS. As part of this assessment work assumptions have been made about the non-strategic allocations which would come forward within the Local Plan area for Gloucester City. It is therefore critical that the proposed Local Plan fully supports the transport strategy identified within the wider Core Strategy.

National Highways is keen to ensure that the policies included within the Plan take account of the need for transport and land use planning to be closely integrated. In this respect, your attention is drawn to the DfT Circular 02/2013 - The Strategic Road Network and the Delivery of Sustainable Development, which sets out how National Highways will engage with the planning system to deliver sustainable development.

National Highways recognises that prosperity depends on our roads, so aims to support growth and facilitate development, based on an understanding of traffic conditions and behaviour, to manage the effects of development and ensure road safety. In order to constructively engage in the local plan-making process, we require a robust evidence-base so that sound advice can be given to local planning authorities in relation to the appropriateness of proposed development in relation to the SRN and the strategic highway and transport solutions that may be required to support potential site allocations.



Paragraph 12 of Circular 02/2013 states that *‘The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.’*

Paragraph 15 states that *‘In order to develop a robust transport evidence base [for local plans], National Highways will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety.’*

Paragraph 18 states that *‘Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. National Highways will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.’*

National Highways Comments

- Policy SA below sets out the site allocations for the GCP. It is noted that under reference SA03, SA04 and SA05, residential dwelling allocations have increased. National Highways therefore requires clarification on whether the transport evidence base has been updated to reflect this.

Policy SA: Gloucester City Plan Site Allocations		
Ref	Site	Allocation
SA03	Former Prospect House, 67 – 69 London Road	Approximately 30 60 residential dwellings.
SA04	Former Wessex House, Great Western Road	Approximately 20 40 residential dwellings.
SA05	Land at Great Western Road Sidings	Approximately 200 300 residential dwellings.

- Under reference MM52, policy G1: Sustainable transport and parking, paragraph 4.7.13, correction is required as reference is made to Highways England (our former name), this should be replaced with National Highways.
- Our previous response within the Statement of Common Ground between National Highways and Gloucester City Council, referred to a proposed allocation of 156 dwellings at Kings Quarter, it is

understood that planning permission has been granted at this site and the approved scheme has now been delivered.

Other

We would highlight that in the Gloucester City Plan (2011-2031) Statement of Common Ground, between National Highways and Gloucester City Council, dated 18th March 2021, National Highways are referred to as Highways England (our former name).

Conclusion

Overall National Highways is content that the Modifications presented are not considered to have an adverse impact on the SRN beyond those previously considered. However, as outlined above, clarification is required on whether the transport evidence base has been updated to reflect the increased allocation at the three sites that fall within policy reference SA03, SA04 and SA05.

We trust that our response will be helpful and assist you with your new Local Plan. If you require further clarification on any issues, please do not hesitate to contact me.

Yours sincerely,

[Redacted signature]

Westley Little

[Redacted contact information]

