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Via email: PlanningLDF@southglos.gov.uk

5th January 2017

Dear Sir/Madam,

**SOUTH GLOUCESTERSHIRE LOCAL PLAN: PROPOSED SUBMISSION POLICIES,
SITES AND PLACES PLAN – SUGGESTED MODIFICATIONS (NOVEMBER 2016)**

Highways England welcomes the opportunity to comment on the South Gloucestershire Local Plan Proposed Submission Policies, Sites and Places Plan Suggested Modifications. As you'll be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises parts of the M4, M5, M32, M48 and M49. It is on the basis of these responsibilities that the comments that follow in this letter have been made.

We are generally interested in the potential traffic impacts of any policies or development sites coming forward through the Local Plan and need to ensure that these are fully assessed during the plan-making stage. It is imperative to identify any improvements needed to deliver aspirations at this early stage, which is set out in government policy. Paragraph 15 of DfT Circular 02/2013 states that:

'In order to develop a robust transport evidence base [for local plans], the Agency (now Highways England) 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. The Highways Agency (now Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.'*

Undertaking suitable assessment of transport impact at the plan-making stage avoids sites being chosen where:

- The traffic impact of the proposed development on the operation of nearby junctions is not known; or
- Proposals for access or transport mitigation are untested and un-costed

Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the NPPF and the 'Highways Agency and the Local Plan Process' protocol – now applicable to Highways England.

We understand that the schedule of suggested modifications to the Proposed Submission Plan has been prepared for the Inspector to consider as part of the examination process. The suggested modifications have been proposed by the Council to address representations made on the Proposed Submission PSP Plan (June 2016) as well as changes that have emerged through internal consultation.

The comments that follow relate only to the amendments that have been put forward in the Suggested Modifications PSP Plan.

PSP11 Transport Impact Assessment

As set out in the PSP consultation in June, we fully support all elements of PSP11 both in terms of their impacts on safety and in the potential reduction on the number of trips on the network.

Part 6 requires new development generating demand for travel not to create or contribute to severe congestion. We are content with the insertion of the phrase severe into the wording of the policy. In line with the NPPF any proposals with potentially significant transportation impacts should be accompanied by the appropriate transport evidence base, and if necessary mitigation proposals.

Paragraph 5.24 has additional text added. Highways England welcomes this text which makes it clear that the larger the development the more frequent and extensive the public transport provision will need to be to reduce the reliance on the private car.

Paragraph 5.28 has been amended to include a requirement for the transport evidence base for development to give consideration to the cumulative impacts arising from other committed development. This is welcomed by Highways England and will make any justification for development in transport terms far more robust.

PSP46 Oldbury New Nuclear Build (NNB)

Highways England is generally encouraged by the content of policy PSP46 and the accompanying text as set out in June 2016. In terms of our comments relating to the suggested modifications they relate to the delivery objectives under the transport theme. We welcome clarification of the need to provide a segregated transport link in order to avoid impact on the local road network. As well as this, the addition of the specific junctions at which park and ride, logistics facilities and motorway access junction improvements are proposed to integrate is very useful rather than just the location.

Summary

Overall Highways England is content with the suggested modifications to the PSP Plan.

Proposals for new development will need to be supported by the appropriate level of robust transport evidence base, and mitigate any severe impacts on the SRN to conform with the NPPF.

If you have any comments or wish to discuss any of the above please do not hesitate to contact me.

Yours sincerely,



Sean Walsh
Asset Manager
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