



Stroud District Local Plan Review

Summary of Responses to Additional Technical Evidence Consultation

APPENDIX C: EB109 Transport Funding and Delivery Plan

December 2022

Development Services
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EB109 Transport Funding and Delivery Plan

Stakeholders	Summarised comments	Stroud District Council Response
Stagecoach (20) PS05,PS05a,PS19a,PS20, PS24,PS25,PS30,PS32, PS43,G1,G2,PS33,PS34, PS36,PS37,PS46,PS38, PS47 DCP1, CP2, CP3, CP4 CP8, CP12,Ei12,DEI1, Ei14, Ei16,	<ul style="list-style-type: none"> The Document is evidently, from its scope, a reactive one to objections raised by National Highways. 	The document is a pro-active approach to addressing funding and delivery matters.
	<ul style="list-style-type: none"> It does very little indeed to further define or to cost wider transport measures in support of the Plan. It overwhelmingly is focused on highway measures at Junctions 12 and 14 of the M5, and on the A38 in the District. It is thus far from comprehensive. 	The Transport Funding and Delivery Plan (TFDP) has focused on the key infrastructure which: is required to enable strategic development; could be prohibitive in terms of site viability; or requires funding / delivery from multiple parties. This is explicitly set out within the TFDP. It is envisioned that more local infrastructure / mitigation schemes will be delivered through the planning application process on a site by site basis (with funding pooled if necessary). The IDP and IDP Addendum provide additional information as to the delivery of transport and highways infrastructure. Cost allowances are included for the wider transport measures within the IDP.
	<ul style="list-style-type: none"> Away from the SRN it particularly exposes the inadequacy of definition of mitigation schemes across all modes which remain more or less conceptual in most regards. This is especially glaring with public transport schemes – most of which aren't even defined much less costed. 	At this stage of the planning process, i.e. plan making, the level of definition is appropriate. The IDP includes cost allowances for the range of mitigation requirements, and not just those within the TFDP.
	<ul style="list-style-type: none"> A crude cost methodology is used that only serves further systemically to underestimate the capital cost of interventions. As a result, most estimates bear no resemblance to figures on broadly comparable projects. We point to recent relevant comparables to substantiate this. This alarmingly distorts the work on development costs and viability (EB112). 	The costs for M5 J12 and A38 Corridor improvements are indicative and as provided in the IDP, which is based on cost bands within the Gloucestershire Local Transport Plan (GLTP). This is considered suitable for the purposes of funding and delivery planning to demonstrate the acceptability of the SLP. The costs for M5 J14 have been prepared in more detail based on an indicative layout provided by NH, which accounts for optimism bias and contingency. The TFDP outlines the proportion of funding to be split between allocation



		sites for the key infrastructure so this can be applied to future infrastructure costs for the three schemes as more details on the schemes are developed. It is explicitly set out within the TFDP that the costs included within the assessment have used different source methodologies, and this has been accounted for within the viability assessment.
	<ul style="list-style-type: none"> The inadequacy of the overall methodology is further exposed by the mismatch between the costs of the M5 j14 replacement, where a “bottom up” cost estimate supported by NH is set out; and j12, which apparently has no such evidential support. 	See comment above.
	<ul style="list-style-type: none"> The work highlights the irony that development is concentrated to the north and south of the District where the SRN is under stress and where distance and need to travel is maximised. This strongly contrasts with j13, where opportunities for sustainable modes can be maximised, while extensive capital works to the highway can be minimised. 	SDC disagrees that the positioning of allocated development in the SLP is inappropriate, or that this pattern of development will maximise the need to travel. Opportunities for development within the Stonehouse-Stroud catchment have been maximised, given broader planning constraints. The sub-set of allocations positioned to the north and south of the District would be able to benefit from shorter travel distances by all modes to North Bristol and Gloucester respectively as key employment and residential areas. The proximity to these locations enables opportunity for active travel and public transport connections, compared to allocations located more centrally within the district.
Wisloe Action Group (32) PS37	<ul style="list-style-type: none"> The large disparity between the costings presented for the M5 junctions (£27.5m vs £6.25m for J14 and J12 respectively) raises major concerns over their accuracy and that of the TFDP. The same costing methodology and assumptions should be used for both schemes to determine whether the CIL apportionment per house is correct or is a significant underestimate of the true cost. Differences in opinion between SDC and the neighbouring Authorities regarding; the levels of 	The costs for M5 J12 and A38 Corridor improvements are indicative and as provided in the IDP, which is based on cost bands within the Gloucestershire Local Transport Plan (GLTP). This is considered suitable for the purposes of funding and delivery planning to demonstrate the acceptability of the SLP. The costs for M5 J14 have been prepared in more detail based on an indicative layout provided by NH, which accounts for optimism bias and contingency. The TFDP outlines the proportion of funding to be split between allocation sites for the key infrastructure so this can be applied to future infrastructure costs for the three schemes as more details on the



	<p>traffic impact, mitigation necessary, assignment of costs to the proposed allocations, funding mechanisms and timing etc may impact on the implementation of the DLP and delivery cannot therefore be assumed. Site promoters and developers will also inevitably undertake their own assessments of impact and seek to minimise their respective contributions.</p>	<p>schemes are developed. It is explicitly set out within the TFDP that the costs included within the assessment have used different source methodologies, and this has been accounted for within the viability assessment.</p> <p>There remains high levels of uncertainty in relation to strategic development in neighbouring authorities and it has not been possible to determine this within the timeframe of preparing the SLP. As such, the TFDP has had to make assumptions in relation to forthcoming development in these areas, based on the Traffic Forecasting Report and modelling, which has been agreed with the highways authorities to be an appropriate tool to assess the SLP. The TFDP sets out a reasonable and evidenced calculations to derive the level of funding required from within Stroud District and that required from neighbouring authorities. Furthermore, through regular engagement with NH, SGC and GCC, all parties have recognised that the submission of the SLP is a point in time and all parties have agreed to work together on the development of specific schemes as details of Development Plans outside of Stroud District come forwards.</p>
	<ul style="list-style-type: none"> • The STSA clearly identifies an assumed increase in the percentage reduction in trips for the proposed PS37 allocation from 10% to 15% based solely on unsubstantiated public transport enhancements along the A38. The TFDP costings for the A38 package should therefore be increased to include both the junction capacity improvements and the envisaged public transport enhancements (including service subsidies). 	<p>The TFDP outlines the proportion of funding to be split between allocation sites for the key infrastructure so this can be applied to future / updated infrastructure costs for the A38 Package as required, although it is anticipated that a package which balances sustainable transport improvements with highways improvements will be comparable in cost with one which purely delivers highways capacity.</p>
	<ul style="list-style-type: none"> • The two-lane extension to the A38 northbound approach to the A4135 roundabout will not fix the congestion problem, it's two lanes already and more effective mitigation (and funding) is required. 	<p>The IDP states that “widening” could be considered for the A38 northbound lanes, which could be more than two lanes if highway capacity enhancements were sought to mitigate effects of future year traffic demand.</p>



	<p>The A38 is a primary emergency diversion route for the M5, additional new traffic lights proposed along the A38 between J13 and J14 will cause significant delays to traffic flows.</p>	<p>The highway mitigation strategy shown in the TFR and TFR Addendum (as discussed in the TFDP) is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the site, especially in terms of a ‘decide and provide’ approach to sustainable transport. Any future planning application will therefore be required to demonstrate the impact of any future mitigation schemes for the A38, including signalisation. The impact on journey times along the A38 would be part of this process.</p>
<p>Grass Roots Planning Ltd on behalf of Redrow Homes Ltd (34) PS36, PS38. PS47</p>	<ul style="list-style-type: none"> Our key concern is that the allocation at Renishaw New Mills is anticipated to contribute £2.14m in s106 contributions towards the M5 J14 improvements, which in our view is likely to make the allocation unviable. Our solution to this is to allocate land north of Charfield Road, Kingswood which is adjacent to the site and can make proportionate contributions to the mitigation scheme and reduce the financial burden off from this important employment allocation. 	<p>The transport assessment generally assumed a mix of office / industry/warehousing at employment locations where the exact nature of the eventual employment provision was not known. As a result, the estimated contribution from the Renishaw site is likely to be higher than the final requirement, given the nature of the emerging planning application. It would not be appropriate to increase housing provision in Kingswood just to increase the pool of sites able to pay for M5 J14 improvements. This allocation has been discounted on landscape grounds. (The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site. Development would significantly extend the settlement form into the open vale countryside on higher ground and is inappropriate within the wider landscape).</p>
<p>Slimbridge Parish Council (37) PS37</p>	<ul style="list-style-type: none"> The large disparity between the costings presented for the M5 junctions (£27.5m vs £6.25m for J14 and J12 respectively) raises major concerns over their accuracy and that of the TFDP. The same costing methodology and assumptions should be used for both schemes to determine whether the CIL apportionment per house is correct or is a significant underestimate of the true cost. Differences in opinion between SDC and the 	<p>The costs for M5 J12 and A38 Corridor improvements are indicative and as provided in the IDP, which is based on cost bands within the Gloucestershire Local Transport Plan (GLTP). This is considered suitable for the purposes of funding and delivery planning to demonstrate the acceptability of the SLP. The costs for M5 J14 have been prepared in more detail based on an indicative layout provided by NH, which accounts for optimism bias and contingency. The TFDP outlines the proportion of funding to be split between allocation sites for the key infrastructure so this can be applied to future</p>



	<p>neighbouring Authorities regarding; the levels of traffic impact, mitigation necessary, assignment of costs to the proposed allocations, funding mechanisms and timing etc may impact on the implementation of the DLP and delivery cannot therefore be assumed. Site promoters and developers will also inevitably undertake their own assessments of impact and seek to minimise their respective contributions.</p>	<p>infrastructure costs for the three schemes as more details on the schemes are developed. It is explicitly set out within the TFDP that the costs included within the assessment have used different source methodologies, and this has been accounted for within the viability assessment.</p> <p>There remains high levels of uncertainty in relation to strategic development in neighbouring authorities and it has not been possible to determine this within the timeframe of preparing the SLP. As such, the TFDP has had to make assumptions in relation to forthcoming development in these areas, based on the Traffic Forecasting Report and modelling, which has been agreed with the highways authorities to be an appropriate tool to assess the SLP. The TFDP sets out a reasonable and evidenced calculations to derive the level of funding required from within Stroud District and that required from neighbouring authorities. Furthermore, through regular engagement with NH, SGC and GCC, all parties have recognised that the submission of the SLP is a point in time and all parties have agreed to work together on the development of specific schemes as details of Development Plans outside of Stroud District come forwards.</p>
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	<ul style="list-style-type: none"> • The two-lane extension to the A38 northbound approach to the A4135 roundabout will not fix the congestion problem, it's two lanes already and 	<p>The IDP states that “widening” could be considered for the A38 northbound lanes, which could be more than two lanes if highway</p>



	<p>more effective mitigation (and funding) is required. The A38 is a primary emergency diversion route for the M5, additional new traffic lights proposed along the A38 between J13 and J14 will cause significant delays to traffic flows.</p>	<p>capacity enhancements were sought to mitigate effects of future year traffic demand.</p> <p>The highway mitigation strategy shown in the TFR and TFR Addendum (as discussed in the TFDP) is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the site, especially in terms of a 'decide and provide' approach to sustainable transport. Any future planning application will therefore be required to demonstrate the impact of any future mitigation schemes for the A38, including signalisation. The impact on journey times along the A38 would be part of this process.</p>
Tritax Symmetry Limited (38) PS43	<ul style="list-style-type: none"> Tritax Symmetry (Gloucester) Ltd accept that they should make a reasonable and fair contribution to infrastructure works to mitigate the impact of their proposal. The proposal is for upto 105,000 sqm of Storage and Distribution (B8). Traffic movements from the proposed scheme are around 12.5% of that forecast for the B1/B2/B8 allocation. Based on the evidence documents submitted a contribution to the M5 Junction 12 Mitigation package of circa £145,000 is considered reasonable to past the tests for S106 payments. The significant reduction in trips from the application proposal negates the need for the dualling of the B4008 when the new grade-separated Junction 12 and signalised approach lanes (and signal optimisation) is completed. 	<p>See comments made in relation to the TFR / TFR Addendum, which are repeated below for reference:</p> <p>The level of contributions to the B4008 scheme (part of the M5 J12 Package) is outlined in the TFDP. The requirement for sites not outlined in the TFDP to contribute to this scheme will be determined through the planning application process.</p>
	<ul style="list-style-type: none"> All allocations should be expected to contribute to infrastructure costs including any works to the B4008. 	<p>See comments made in relation to the TFR / TFR Addendum.</p>
	<ul style="list-style-type: none"> It is crucial to the SDLP that a scheme and accurate cost estimate for M5 J12 is established together 	<p>The costs for M5 J12 and A38 Corridor improvements are indicative and as provided in the IDP, which is based on cost bands within the</p>



<p>CarneySweeney on behalf of Redrow Homes (46) G1 CP6,CP13,EI12</p>	<p>with realistic apportionment of funds to determine any shortfall such that sources of funding can be secured to provide certainty and the timely delivery of the Local Plan.</p> <ul style="list-style-type: none"> • There is uncertainty over the overall cost of M5 J12 improvement works, errors in the apportionment of impacts and an expectation that significant proportions of the funding of the mitigation packages will come from neighbouring authorities. • This has not been discussed with the JCS authorities and there is no timescale or certainty and limited information on the locations or timing of housing growth outside of the Stroud District as acknowledged by the FDP (the preparation of the review of the JCS has slipped against the original LDS and a Preferred Options consultation is envisaged in Spring 2023). • The mention of a new Park & Ride site at M5 J12, which has not been included in the FDP, is vague and needs to be firmed up to ensure an appropriate location is identified if it is to form part of the County Council's interchange strategy. 	<p>Gloucestershire Local Transport Plan (GLTP). This is considered suitable for the purposes of funding and delivery planning to demonstrate the acceptability of the SLP. The costs for M5 J14 have been prepared in more detail based on an indicative layout provided by NH, which accounts for optimism bias and contingency. The TFDP outlines the proportion of funding to be split between allocation sites for the key infrastructure so this can be applied to future infrastructure costs for the three schemes as more details on the schemes are developed. CarneySweeney / Redrow Homes reference errors in the apportionment of impacts used to inform the TFDP, however these errors have not been outlined in the comment to enable SDC to confirm or address if required. SDC have confidence in the methodology used to apportion impact between authority areas, and specific site allocations within Stroud District, and it is considered to provide realistic and evidenced assumptions as to development within neighbouring authorities in the absence of sufficiently progressed development plans.</p> <p>The uncertainty referenced is explicitly acknowledged and set out in the TFDP. All parties have recognised that the submission of the SLP is a point in time and all parties have agreed to work together on the development of specific schemes as details of Development Plans outside of Stroud District come forwards.</p> <p>The P&R at M5 J12 is a GLTP4 scheme which is still in the early stages of planning and would be led by GCC.</p>
	<ul style="list-style-type: none"> • The mechanisms to deliver the strategic infrastructure (whether this be through CIL, S106, neighbouring LPA's or other funding sources) should be clarified and explicitly set out in the Local Plan and IDP so as not to cause any unnecessary delays to the delivery trajectory or phasing of the strategic sites. 	<p>The ability to use both the s106 regime and CIL to fund infrastructure (as well as other sources) provides a degree of flexibility for the Council to be able to facilitate development. There is uncertainty over the future funding of infrastructure at a national level at the current time but the Council is well placed to be able to respond quickly when the Government sets out its future plans.</p>



<p>Blue Fox Planning Ltd on behalf of Persimmon Homes (Severn Valley) Ltd (53) PS24</p>	<ul style="list-style-type: none"> The Funding and Delivery Plan (FDP) is based on an apportionment of funding from sources outside of the Stroud District, including neighbouring authorities. However, this does not benefit from specific details on planned growth at neighbouring authorities due to the stage in plan-making outside of Stroud District. 	<p>This is correct as there remains high levels of uncertainty in relation to strategic development in neighbouring authorities and it has not been possible to determine this within the timeframe of preparing the SLP. As such, the TFDP has had to make assumptions in relation to forthcoming development in these areas, based on the Traffic Forecasting Report and modelling, which has been agreed with the highways authorities to be an appropriate tool to assess the SLP. The TFDP sets out a reasonable and evidenced calculations to derive the level of funding required from within Stroud District and that required from neighbouring authorities. Furthermore, through regular engagement with NH, SGC and GCC, all parties have recognised that the submission of the SLP is a point in time and all parties have agreed to work together on the development of specific schemes as details of Development Plans outside of Stroud District come forwards.</p>
	<ul style="list-style-type: none"> Paragraph 5.11 appears to suggest that these proportions of growth in neighbouring authorities have been derived using housing delivery in Stroud District 2010 to 2021. We question why EB109 does not consider housing delivery in the neighbouring authorities rather than rely on the Stroud District delivery information. 	<p>The use of Stroud District data to inform assumptions has been required owing to an absence of specific data for neighbouring authorities. It is considered that this is a reasonable assumption for the relatively high-level calculations undertaken for this purpose within the TFDP.</p>
	<ul style="list-style-type: none"> Paragraph 5.13 states that funding for strategic mitigation packages is assumed to only be available from SDLP development allocations, and the growth from neighbouring authority strategic / large scale developments. 	<p>Comment noted.</p>
	<ul style="list-style-type: none"> It would appear to be inconsistent to make this assumption when Table 6 identifies meaningfully levels of impact from small sites, albeit significantly less than larger scale strategic sites. It is not adequately explained why small / windfall sites are not considered appropriate to contribute to 	<p>The uncertainty in the Development Plans outside of Stroud District has been noted within the TFDP and by Blue Fox Planning. The potential sources of funding were considered through the development of the TFDP, and for the purpose of a robust assessment it was considered appropriate to discount the</p>



	<p>infrastructure upon which their delivery would have an impact.</p>	<p>cumulative impact of small/windfall sites as funding sources, as this would have resulted in an additional level of uncertainty.</p> <p>Contributions to mitigation schemes (local and wider) will be considered and sought for these allocations as part of the planning process. However, it was not considered to be a realistic expectation to rely on such contributions for the purpose of the TFDP, which informs viability assessments of strategic sites and the fundability of infrastructure.</p>
	<ul style="list-style-type: none"> The challenges of providing certainty on strategic / large scale development is understood due to the stage of plan-making in neighbouring authorities, therefore the reliance on assumptions detailed in the FDP should be justifiable and informed by realistic expectations. 	<p>The TFDP sets out a reasonable and evidenced calculations to derive the level of funding required from within Stroud District and that required from neighbouring authorities.</p>
<p>Councillor Haydn Jones (54) PS24,PS25,PS35, PS36,PS37 All policies</p>	<ul style="list-style-type: none"> Estimated figures for motorway and other road improvements are woefully optimistic and unsubstantiated. 	<p>The costs for M5 J12 and A38 Corridor improvements are indicative and as provided in the IDP, which is based on cost bands within the Gloucestershire Local Transport Plan (GLTP). This is considered suitable for the purposes of funding and delivery planning to demonstrate the acceptability of the SLP. The costs for M5 J14 have been prepared in more detail based on an indicative layout provided by NH , which accounts for optimism bias and contingency. The TFDP outlines the proportion of funding to be split between allocation sites for the key infrastructure so this can be applied to future infrastructure costs for the three schemes as more details on the schemes are developed. It is explicitly set out within the TFDP that the costs included within the assessment have used different source methodologies, and this has been accounted for within the viability assessment.</p>
	<ul style="list-style-type: none"> Even before inflation these costs do not reflect the reality of such major works. 	<p>See comment above.</p>
	<ul style="list-style-type: none"> The highways department have continually highlighted the severe inadequacies of proposed plans at PS36 and PS37. Stroud Strategic Planners 	<p>The STS and STS Addendum justifies why the proposed level of mode switch from car-based travel to sustainable transport can be made.</p>



	<p>and promoters of preferred sites have tried to narrow the gap by exaggerating modal shift and underestimating costs for road improvements in an attempt to demonstrate viability. Practical evidence for modal shift is away from public transport into personal transport and significantly increased costs for civil engineering works.</p>	<p>The mode shift is enabled by specific sustainable transport initiatives and / or infrastructure proposals.</p> <p>The mode shifts presented have been agreed with the relevant Highway Authorities, including GCC and National Highways and between the representing transport planning professionals. The STS Addendum outlines more robust mode share following acknowledgement from the Highway Authorities that more ambitious targets are likely to be achievable. The Highway Authorities have been keen throughout discussion on the STS not to promote overly-ambitious mode shift and as such the values presented in the STS Addendum are considered to be practicable and realistic.</p>
<p>Gloucestershire County Council (55) All sites</p>	<ul style="list-style-type: none"> • GCC officers are concerned about the robustness of the mitigation scheme cost estimates given and would like to see changes to the text in paragraph 3.2 which refers to the cost bands provided in the GLTP4. • In addition, there are considerable uncertainties about growth plans in neighbouring authorities which creates uncertainty around the cost shares allocated to these. These uncertainties as well as concerns about the robustness of the cost estimates could raise viability concerns of some development sites. Therefore other external funding may be required. 	<p>GLTP4 is an adopted document, and it is appropriate for District’s within Gloucestershire to rely on this information when forward planning for infrastructure delivery. The use of the cost bands within GLTP4 was included in the original IDP which was submitted at the time the SLP was submitted for examination. SDC is open to revising the wording in paragraph 3.2 to an alternative wording that GCC provides, subject to the review of that wording.</p> <p>There remains high levels of uncertainty in relation to strategic development in neighbouring authorities and it has not been possible to determine this within the timeframe of preparing the SLP. As such, the TFDP has had to make assumptions in relation to forthcoming development in these areas, based on the Traffic Forecasting Report and modelling, which has been agreed with the highways authorities to be an appropriate tool to assess the SLP. The TFDP sets out a reasonable and evidenced calculations to derive the level of funding required from within Stroud District and that required from neighbouring authorities. Furthermore, through regular engagement with NH, SGC and GCC, all parties have recognised that the submission of the SLP is a point in time and all</p>



		parties have agreed to work together on the development of specific schemes as details of Development Plans outside of Stroud District come forwards.
Avion Young on behalf of Tortworth Estate and St Modwen Homes (56) CP6	<ul style="list-style-type: none"> Despite having questions about whether an appropriate balance has been found between delivering sustainable measures and constructing new highways infrastructure, the cost of the mitigation packages, and security of funding for the J14 mitigation, the additional detail about the mitigation packages is welcomed and will hopefully serve as a framework for ongoing discussions between the neighbouring authorities about cost apportionment and delivery. 	Comment noted.
Hamfallow Parish Council (61)	<ul style="list-style-type: none"> Table 1 and para 2.11, imply that the A38 improvement package, including the B4066, Alkington and Breadstone junctions may not be improved: "A38 corridor provides the opportunity to provide corridor based improvements to public transport and active travel modes". We take this to mean that spending will be on public transport and cycling, instead of improved infrastructure 	<p>The junctions at Alkington and Breadstone have been omitted from the A38 package for the purposes of the TFDP however this does not mean that if sites are demonstrated to experience a significant impact that mitigation will not be provided through planning application process(es).</p> <p>The form of mitigation on the A38 corridor has not been confirmed at this stage, however paragraph 2.1.1 confirms that public transport / active travel will be incorporated, rather than a solely traffic capacity based scheme. The TFDP outlines highway mitigation costs to determine the level of cost involved to resolve SLP impacts.</p>
	<ul style="list-style-type: none"> paragraph 4.1 indicates that National Highways (NH) are unlikely to fund the M5-J14 improvements. We have indicated in our previous responses that such improvement would be an essential pre-condition for this development. 	The development referenced is not clear, however the TFDP has outlined a reasonable approach to how mitigation for M5 J14 could be funded / delivered given the uncertainty around neighbouring authority strategic growth.
	<ul style="list-style-type: none"> paragraph 6.3 says that: "Due to the strategic nature of the mitigation required, there remains a level of uncertainty around the funding mechanisms and timing". We interpret this to 	Comment noted. The approach to funding and delivery is set out in the TFDP. This sets the process for agreeing and securing funding from development sites.



	<p>mean that no funding has been agreed. The following paragraph says that ... “it would not be appropriate for Stroud District to delay its Plan to allow external plans to develop”.</p>	
	<ul style="list-style-type: none"> From the above points, it seems clear to us that there have been no significant developments in the STS that would address our concerns over the inadequacy of transport links and infrastructure for the PS36 development. The District seem determined to press on with their plan despite there being no evidence that the infrastructure improvements necessary for its successful implementation will be forthcoming. This is extremely unwise. 	<p>The first comment is in relation to the STS and has also been submitted there. Please refer to separate comments made to Hamfallow Parish Council under the STS.</p> <p>The TFDP outlines that allocation PS36 will be required to make proportional contributions to key mitigation, including material levels of contribution to the A38 Corridor improvements and M5 J14 schemes. The appropriate level of infrastructure to deliver and make acceptable Site Allocation PS36 will be confirmed through the planning application process and is not within the scope of consideration of the TFDP.</p>
BaSRAG (Berkeley and Sharpness Residents' Action Group) (64) PS36	<ul style="list-style-type: none"> Very little new evidence to address concerns about accessibility of PS36 and no evidence to support the feasibility of rail proposals to connect Sharpness. 	<p>The comments are in relation to the STS. SDC refer to separate comments made to BaSRAG under the STS.</p>
National Highways (67)	<p>National Highways has some concerns regarding the Transport Funding and Delivery Plan (TF&DP) as follows:</p> <ul style="list-style-type: none"> We are not currently satisfied that the funding and delivery plan is effective (as per NPPF paragraph 35) given its reliance on third party (development) cumulative contributions and the significant proportion of the costs being sought from developments in neighbouring LPAs. 	<p>SDC is required to rely on third-party contributions to improve the SRN junctions on the basis that National Highways is unable to commit to the availability of central funding sources such as RIS or similar funding streams. A significant proportion of impact at these junctions will be due to development in neighbouring LPAs, and not be solely owing to SDC growth, and as such contributions from across the region will be required.</p> <p>Relying on key strategic site allocations within the SLP to deliver these schemes is considered reasonable given that without these schemes coming forward, the impact burden from within SDC is significantly reduced.</p>



		<p>It is acknowledged that there remains high levels of uncertainty in relation to strategic development in neighbouring authorities, and that it has not been possible to determine this within the timeframe of preparing the SLP. As such, the TFDP has had to make assumptions in relation to forthcoming development in these areas, based on the Traffic Forecasting Report and modelling, which has been agreed with the highways authorities to be an appropriate tool to assess the SLP. The TFDP sets out a reasonable and evidenced calculations to derive the level of funding required from within Stroud District and that required from neighbouring authorities. Furthermore, through regular engagement with NH, SGC and GCC, all parties have recognised that the submission of the SLP is a point in time and all parties have agreed to work together on the development of specific schemes as details of Development Plans outside of Stroud District come forwards.</p>
	<ul style="list-style-type: none"> • Although we support the principles behind the TF&DP, it does not identify a delivery mechanism nor any contingency should funding from any development not become available or allocations vary at the adoption stage. Noting that the Plan makes a passing reference to external funding sources, such as Homes England, which may be available to unlock housing growth should there be a funding shortfall. This could mean that an SRN scheme and therefore the SDLP, may become undeliverable. National Highways commits to continued working in collaboration with SDC and neighbouring authorities to explore funding opportunities and delivery routes for necessary SRN infrastructure improvements and we make the following comments on the TF&DP. 	<p>Through regular engagement with NH, SGC and GCC, all parties have recognised that the submission of the SLP is a point in time and all parties have agreed to work together on the development of specific schemes as details of Development Plans outside of Stroud District come forwards.</p>
	<ul style="list-style-type: none"> • National Highways has not had sight of any Statements of Common Ground underpinning the 	<p>Comment noted. SDC intends to progress SoCGs with a range of parties. However, it should be noted that SGC has advised that it is</p>



	<p>TF&DP assumptions. This is especially important given the significant proportion of funding contributions required from neighbouring LPAs at M5 Junctions 12 and 14. We welcome further discussion with SDC on this point to provide comfort regarding the assumptions underpinning the funding arrangements for these SRN schemes.</p>	<p>currently unable to advise on development levels or locations at this early stage of its own Local Plan process.</p>
	<ul style="list-style-type: none"> The TF&DP (p.14, para.6.5) states that “National Highways is considering an interim scheme for M5 Junction 14, which would potentially provide additional capacity to accommodate growth for a number of years.” This is not the case. To clarify, National Highways’ Spatial Planning team has been undertaking modelling to determine whether the cumulative impacts of traffic arising from speculative developments affecting M5 Junction 14 are proposing appropriate mitigations and whether a further interim improvement would be beneficial in the medium or long term. These results have been shared with SDC and neighbouring authorities in confidence. However, this remains as a spatial planning study for the purposes of clarifying National Highways’ response to planning applications. The study has no wider status within National Highways and it currently has no plans or proposals for any improvement at M5 Junction 14. 	<p>The statement in the TFDP is accurate and we welcome the additional commentary which confirms that National Highways is considering an interim scheme. The TFDP makes no comment on the statement of a potential scheme, nor funding sources, nor does it state that NH is promoting the scheme. It is relevant to the TFDP that a scheme is being considered.</p>
	<ul style="list-style-type: none"> National Highways does not consider that the estimated scheme costs at M5 Junctions 12 and 14 are at current market value. Therefore, as the TF&DP are based upon these estimates we consider that this is a risk to the deliverability of the SDLP because if a scheme is undervalued it cannot be delivered at the figure identified. In its 	<p>The costs for M5 J12 and A38 Corridor improvements are indicative and as provided in the IDP, which is based on cost bands within the Gloucestershire Local Transport Plan (GLTP). This is considered suitable for the purposes of funding and delivery planning to demonstrate the acceptability of the SLP. The costs for M5 J14 have been prepared in more detail based on an indicative layout provided by NH , which accounts for optimism bias and contingency. The TFDP</p>



	<p>current form the costings in the TF&DP raise deliverability and viability concerns to National Highways. Hence, we seek to work with SDC to understand the assumptions and costs associated with these schemes in order to ascertain a revised current market value for the schemes to ensure that both SDC and National Highways have comfort in the estimates provided that support the SDLP.</p>	<p>outlines the proportion of funding to be split between allocation sites for the key infrastructure so this can be applied to future infrastructure costs for the three schemes as more details on the schemes are developed. It is explicitly set out within the TFDP that the costs included within the assessment have used different source methodologies, and this has been accounted for within the viability assessment.</p> <p>The cost basis for the M5 Junction 14 scheme has been shared with the Transport Working Group, and SDC welcomes the commitment to work together on the costs, as well as the schemes themselves.</p>
	<ul style="list-style-type: none"> SDC has only demonstrated through strategic traffic modelling that improvements to SRN junctions might provide a solution to the issues caused by increased traffic from the additional development in the SDLP and from surrounding LPAs. There remains a need to indicate that proposed improvements are viable and ultimately deliverable and that the proposed mitigation can be considered 'effective' as per NPPF paragraph 35. 	<p>The TFDP has considered the funding and delivery of the SRN mitigation as is appropriate for the current stage of the SLP adoption process, noting the uncertainty in Development Plans in Neighbouring Authorities. There is a reasonable prospect that appropriate mitigation can be delivered to mitigate the impacts of the SDLP.</p>
	<ul style="list-style-type: none"> It is not clear when improvements at M5 Junctions 12, 13 and 14 will be required before the end of the SDLP period (2040), and who would decide the timing of their delivery. National Highways anticipates that the improvements would be required early in the SDLP period. Within any forthcoming SoCG we seek to confirm that SDC and National Highways commit to collaborating on further testing early in the SDLP period to feed into a phasing plan in order to resolve this question. 	<p>It has not been possible or appropriate at this stage to determine trigger points for infrastructure, due to the uncertainty on the timing of growth external to the SDC area. As such it has not been appropriate to consider producing intermediary year traffic models. This is a common and appropriate approach for the preparation of Local Plans.</p> <p>SDC is committed to working with neighbouring authorities to provide suitable mitigation across the region.</p>



	<ul style="list-style-type: none"> It is not clear who the scheme promoters would be and who would underwrite any financial risks for improvements at M5 Junctions 12, 13 and 14. 	Promotion and delivery of the M5 junction improvements would be the relevant Local Planning Authorities. This is SDC in the case of M5 J12 and J13 and SGC in the case of M5 J14. National Highways has previously advised that it would not be able to act as the promotor of the scheme, or underwrite financial risks.
South Gloucestershire Council (71)	<ul style="list-style-type: none"> In Summary, South Gloucestershire Council has raised concerns regarding the technical evidence published for consultation on 27th September and which SDC seek to rely on to justify the reasonable prospect that the funding and delivery of their Local Plan spatial strategy can be achieved in a sustainable way. South Gloucestershire Council has put forward recommendations to resolve these matters and would welcome continuing to work with Stroud District Council to resolve these matters through agreeing appropriate modifications which can be secured through a SoCG ahead of examination in public commencing. Subject to this, the matters remain unresolved and points of objection at the current time. 	SDC will continue to work with SGC through a Statement of Common Ground to address issues raised.
Pegasus group on behalf of Robert Hitchins (73)	<ul style="list-style-type: none"> It is of paramount importance to the SDLP that schemes and accurate cost estimates for M5 J12 & M5 J14 are established together with realistic apportionment of funds to determine any shortfall such that sources of funding can be secured to provide certainty and the timely delivery of the Local Plan. There is a gross underestimate of the cost of M5 Junction 12, errors in the apportionment of impacts and an expectation that significant proportions of the funding of the mitigation packages will come from Neighbouring Authorities. This has not been discussed with the JCS authorities and there is no timescale or 	The costs for M5 J12 and A38 Corridor improvements are indicative and as provided in the IDP, which is based on cost bands within the Gloucestershire Local Transport Plan (GLTP). This is considered suitable for the purposes of funding and delivery planning to demonstrate the acceptability of the SLP. The costs for M5 J14 have been prepared in more detail based on an indicative layout provided by NH, which accounts for optimism bias and contingency. The TFDP outlines the proportion of funding to be split between allocation sites for the key infrastructure so this can be applied to future infrastructure costs for the three schemes as more details on the schemes are developed.



	<p>certainty and limited information on the locations or timing of housing growth outside of the Stroud District as acknowledged by the FDP, (the preparation of the review of the JCS has slipped against the original LDS and a Preferred Options consultation is envisaged in Spring 2023). This questions the affordability and deliverability of the proposed mitigation packages to deliver the Local Plan growth, particularly early on in the plan period.</p>	<p>Pegasus Group / Robert Hitchins reference errors in the apportionment of impacts used to inform the TFDP, however these errors have not been outlined in the comment to enable SDC to confirm or address if required. SDC have confidence in the methodology used to apportion impact between authority areas, and specific site allocations within Stroud District, and it is considered to provide realistic and evidenced assumptions as to development within neighbouring authorities in the absence of sufficiently progressed development plans.</p> <p>The uncertainty referenced regarding progress with plans for adjacent areas is explicitly acknowledged and set out in the TFDP. We have engaged with GCC regarding the apportionment of potential impacts including from adjacent districts. All parties have recognised that the submission of the SLP is a point in time and all parties have agreed to work together on the development of specific schemes as details of Development Plans outside of Stroud District come forwards.</p> <p>The P&R at M5 J12 is a GLTP4 scheme which is still in the early stages of planning and would be led by GCC.</p>
	<ul style="list-style-type: none"> • The FDP has confirmed that the updated traffic modelling has shown that PS19a NW Stonehouse has little impact on the key strategic infrastructure comprising the mitigation packages; and that the allocation is not required to contribute to their funding. 	<p>This is an accurate reading of the TFDP. However, assessment of impacts and delivery of appropriate mitigation associated with this allocation will need to be determined through the planning application process.</p>
	<ul style="list-style-type: none"> • It is of paramount importance to the SDLP that schemes and accurate cost estimates for M5 J12 & M5 J14 and the A38 corridor are established. Only once accurate costings of the schemes have been established and the apportionment of costs undertaken, can any shortfall in funding be known, 	<p>See comment above.</p>



	<p>and the likelihood or otherwise, of other sources of funding actually being available. If the schemes could be fully funded, then the timescales for their delivery will be important given that many of the strategic site allocations rely on them to be delivered before any significant amount of development can come forward.</p>	
	<ul style="list-style-type: none"> • There is a gross underestimate of the cost of M5 Junction 12, errors in the apportionment of impacts and an expectation that significant proportions of the funding of the mitigation packages will come from Neighbouring Authorities which is not guaranteed. This questions the affordability and deliverability of the proposed mitigation packages to deliver the Local Plan growth, particularly early on in the plan period. 	See comment above.
Lichfields on behalf of CEG and the Charfield Land Owners Consortium (78)	<ul style="list-style-type: none"> • Based on a review of the additional evidence submitted it is considered that there remains a lack of detail and more importantly evidence in regard to the form and delivery of the substantial improvement required at M5 J14 to support the SDLPR allocations. This therefore undermines the soundness of the FDP (EB109) in particular and subsequently the IDP (EB110), as well as the policies listed at Paragraph 1.1.2. The evidence base now before the Examination is deficient in relation to: <ul style="list-style-type: none"> • The form of the mitigation proposed; • The cost of the works including a breakdown; • How these major infrastructure improvements will be funded; • How thresholds for contributions have been derived; and 	<p>SDC disagree with this assessment of the TFDP, which outlines considerable evidence and information in relation to the funding of improvements at M5 J14. Levels of uncertainty remain, and this is explicitly acknowledged, primarily due to external factors such as stalled progress on neighbouring Development Plans. SDC has used the best information and tools available to progress these issues, but has noted that further work is needed with the highways authorities and neighbouring LPAs, which has not been possible at this stage of plan making. Each of the bullet points provided have been suitably covered within the TFDP in relation to M5 J14 as follows:</p> <ul style="list-style-type: none"> - Indicative grade separated roundabout scheme in the form of that assessed within the TFR; - Costs of each mitigation package has been included (Table 2), and breakdown of costs for Junction 14 have been provided to the highways authorities to enable further discussion on the indicative costs of the scheme.



	<ul style="list-style-type: none"> • How the level of funding anticipated from the strategic development sites has been calculated and thresholds for requiring contributions. 	<ul style="list-style-type: none"> - Breakdown of funding to be delivered by SDLP allocations and allocations outside of the District is provided (Table 7) and a breakdown of the proportion of funding from sites allocated within the SLP (Table 9). Considering the stage of neighbouring Development Plans, it has been necessary to establish a methodology using the TFR model which has been agreed with the highways authorities to be the best available tool, to identify the level of growth from which there is a reasonable prospect of funding being available; - Sites which have a material impact have been considered, and the funding has been sifted to exclude a sub-set of these which would fund less than 5% of the total cost (reallocated to other sites). Small scale and windfall sites are also excluded from the calculations. It is likely that contributions will be sought from these sites, however, they have been excluded at this stage for the purpose of a robust assessment and a “worst-case” estimate of development with a reasonable prospect of providing funding; and - As above.
<p>Nexus Planning on behalf of Crest Nicholson (82)</p>	<ul style="list-style-type: none"> • The Hunts Grove Extension was allocated for development in the current Local Plan that was adopted in November 2015. As such it should be counted as a committed development and therefore form part of the 2040 Baseline Forecast / ‘do minimum’ scenario. • Furthermore, any spare capacity at Junction 12 should be set aside for existing allocations and subtracted from the assessment that informs how funding costs are apportioned between the emerging allocations. 	<p>PS30 Hunts Grove Extension is an allocation in the adopted Local Plan. However, the new Local Plan is not a partial update of the adopted Local Plan (i.e. retaining allocations but rolling the Plan forward), it is a full scale review.</p> <p>Therefore, unless an adopted site has planning permission or has started development, it is subject to this review process and both the principle of the allocation and its policy requirements need to be reviewed.</p>



Individuals	Summarised comments	Stroud District Council Response
Individual (1) G2	<ul style="list-style-type: none"> The traffic plan identified for Cole Avenue, Epney Road and St Barnabas Roundabout needs to be implemented ahead of any build / increase in traffic levels 	The timing of mitigation will be agreed with the relevant highway authority at the planning application stage.
Individual (14) PS37	<ul style="list-style-type: none"> AECOM note a lack of consistency in Section 3.5 in the cost estimates for the M5 junction improvement costs which in turn casts doubt on the CIL calculations. 	Paragraph 3.5 states that the costs / apportionment calculations have been supplied to ARUP to ensure consistency. Not clear what this comment is referring to.
Individual (15) PS37	<ul style="list-style-type: none"> There is a definite inconsistency with respect to cost estimates. Note Jn 12 is estimated at £6.25m but that of Jn 14 is £27.2m. This inconsistency also noted in the report by AECOM themselves. This does not inspire confidence 	The costs for M5 J12 improvements are indicative as provided in the IDP. This is considered suitable for the purposes of funding and delivery planning. The Plan outlines the proportion of funding to be split between allocation sites to be applied to future infrastructure costs for the three schemes as required. The viability assessment accounts for the inconsistency between methodologies to ensure that the assessment is undertaken on a common basis.
Individual (16) PS33, BER17/16, BER34, BER35, BER36	<ul style="list-style-type: none"> I have no comment on the costs 	Comment noted.
Individual (17) All sites	<ul style="list-style-type: none"> The uncertainties in the funding and the lack of understanding of the triggers and sequencing must be urgently addressed in order to determine if the required strategic transport requirements needed for such huge developments are likely to be delivered. 	The timing of mitigation will be agreed with the relevant highway authority at the planning application stage.
	<ul style="list-style-type: none"> The plan can not be judged as realistic, appropriate and funded and it is not possible to judge what would happen in the event of delays or lack of funding giving huge concern to residents and all stakeholders without this clarity. 	There remains high levels of uncertainty in relation to strategic development in neighbouring authorities and it has not been possible to determine this within the timeframe of preparing the SLP. As such, the TFDP has had to make assumptions in relation to forthcoming development in these areas, based on the Traffic Forecasting Report and modelling, which has been agreed with the highways authorities to be an appropriate tool to assess the SLP. The TFDP sets out a reasonable and evidenced calculations to derive the



		<p>level of funding required from within Stroud District and that required from neighbouring authorities. Furthermore, through regular engagement with NH, SGC and GCC, all parties have recognised that the submission of the SLP is a point in time and all parties have agreed to work together on the development of specific schemes as details of Development Plans outside of Stroud District come forwards.</p>
<p>Individual (30,64) PS37</p>	<ul style="list-style-type: none"> The large disparity (£27.5m vs £6.25m) between the two costings for the M5 junctions raises major concerns over their accuracy and that of the TFDP. The same costing methodology and assumptions should be used for both schemes to determine whether the CIL apportionment per house is correct or is a significant underestimate of the true cost. The differences in opinion between SDC and neighbouring Authorities regarding; the levels of traffic impact, mitigation necessary, assignment of costs to the proposed allocations, funding mechanisms and timing etc is unacceptable at this late stage in the Local Plan process and will impact on the implementation. Delivery cannot be assumed as advertised, especially as site developers will also inevitably undertake their own assessments and seek to minimise their contributions. 	<p>The costs for M5 J12 and A38 Corridor improvements are indicative and as provided in the IDP, which is based on cost bands within the Gloucestershire Local Transport Plan (GLTP). This is considered suitable for the purposes of funding and delivery planning to demonstrate the acceptability of the SLP. The costs for M5 J14 have been prepared in more detail based on an indicative layout provided by NH, which accounts for optimism bias and contingency. The TFDP outlines the proportion of funding to be split between allocation sites for the key infrastructure so this can be applied to future infrastructure costs for the three schemes as more details on the schemes are developed. It is explicitly set out within the TFDP that the costs included within the assessment have used different source methodologies, and this has been accounted for within the viability assessment.</p> <p>There remains high levels of uncertainty in relation to strategic development in neighbouring authorities and it has not been possible to determine this within the timeframe of preparing the SLP. As such, the TFDP has had to make assumptions in relation to forthcoming development in these areas, based on the Traffic Forecasting Report and modelling, which has been agreed with the highways authorities to be an appropriate tool to assess the SLP. The TFDP sets out a reasonable and evidenced calculations to derive the level of funding required from within Stroud District and that</p>



		required from neighbouring authorities. Furthermore, through regular engagement with NH, SGC and GCC, all parties have recognised that the submission of the SLP is a point in time and all parties have agreed to work together on the development of specific schemes as details of Development Plans outside of Stroud District come forwards.
	<ul style="list-style-type: none"> The STSA assumed increase in the percentage reduction in trips for PS37 allocation from 10% to 15% is based solely on unsubstantiated public transport enhancements along the A38, this is unacceptable. 	The TFDP outlines the proportion of funding to be split between allocation sites for the key infrastructure so this can be applied to future / updated infrastructure costs for the A38 Package as required, although it is anticipated that a package which balances sustainable transport improvements with highways improvements will be comparable in cost with one which purely delivers highways capacity.
	<ul style="list-style-type: none"> The two-lane extension to the A38 northbound approach to the A4135 roundabout will not fix the congestion problem, it's two lanes already and more effective mitigation (and funding) is required. 	The IDP states that "widening" could be considered for the A38 northbound lanes, which could be more than two lanes if highway capacity enhancements were sought to mitigate effects of future year traffic demand.
	<ul style="list-style-type: none"> The A38 is a primary emergency diversion route for the M5, additional new traffic lights proposed along the A38 between J13 and J14 will cause significant delays to traffic flows. 	The highway mitigation strategy shown in the TFR and TFR Addendum (as discussed in the TFDP) is just one way in which mitigation could come forward. SDC will welcome alternative proposals for mitigation through future planning applications for the site, especially in terms of a 'decide and provide' approach to sustainable transport. Any future planning application will therefore be required to demonstrate the impact of any future mitigation schemes for the A38, including signalisation. The impact on journey times along the A38 would be part of this process.
Individual (45)	<ul style="list-style-type: none"> Please ask SDC planning where the funding is for the major road improvements required for Cam. 	The TFDP sets out how the mitigation schemes will be funded.
Individual (48)	<ul style="list-style-type: none"> The additional potential vehicular traffic that would be generated will cause significant problems and disruption on the existing restricted and narrow Glebe Estate roads. 	The TFR is a strategic level assessment to identify the impacts and mitigation for the plan as a whole. Each development will be required to undertake a more local assessment of impacts and



		required mitigation at the planning application stage, through a Transport Assessment.
Individual (50)	<ul style="list-style-type: none"> Massive financial input required to provide sustainable transport links for proposed settlement in Berkeley and Sharpness area. 	This is noted and accounted for within the viability assessment for the Sharpness site.
Individual (58)	<ul style="list-style-type: none"> Where is the funding for the necessary road improvements that are needed in the Cam Parish 	The TFDP sets out how the mitigation schemes will be funded.
Individual (59)	<ul style="list-style-type: none"> No empirical data to support conclusions. No holistic assessment of current and future development as would be expected in a strategic document 	This evidence is included within the Traffic Forecasting Report.
	<ul style="list-style-type: none"> Current transport is already at capacity. 	
Individual (60) PS24,PS25,PS37	<ul style="list-style-type: none"> There is no evidence to back up the significant difference of cost of transport infrastructure. 	The costs for M5 J12 improvements are indicative as provided in the IDP. This is considered suitable for the purposes of funding and delivery planning. The Plan outlines the proportion of funding to be split between allocation sites to be applied to future infrastructure costs for the three schemes as required.
	<ul style="list-style-type: none"> It appears the other local authorities do not have an agreed view on how to mitigate transport solutions 	Comment noted.
Individual (80,86)	<ul style="list-style-type: none"> There appears to be no credible plan for improvements of infrastructure. There is no mention of timing of any works needed to enable safe living conditions for the population of Cam and Dursley. 	The IDP (EB110) in conjunction with this document sets out funding and where available details on delivery. Timing of delivery of works will be established through planning applications.
	<ul style="list-style-type: none"> Who will decide what will actually be done? With the current state of our economy there will be real cuts to local government spending, therefore many works will not happen across the county and obviously it could mean none of the needed works might not happen. How would we cope with such a large increase in population? 	Comments noted.



Individual (85)	<ul style="list-style-type: none"> No mention of improvements or timescales. 	Improvements are set out in the TFR and STS, and referenced in the TFDP where appropriate. Timescales will be established through the Planning Application process.
Individual (87)	<ul style="list-style-type: none"> With no clarity on timing and funding of the delivery plan, it can only be assumed there will be further uncertainty that any of the aims/ promises will be in place or reached before the planned decisions on PS24/25 	Comments noted. The SLP is a point in time and further work will be undertaken with the relevant parties to progress timing and funding of scheme delivery. Decisions on planning applications will need to secure funding contributions, which provides confidence that development will not come forwards without appropriate mitigation.

